

PRIVACY POLICY
OF
ECHEMICLES ZRT.

2023.05.02.

Dr. Péter Juhász
lawyer

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1. Introduction

ThalesNano Energy Zrt was established at the end of November 2017, mainly to develop, sell and market H-Genie chemical engineering equipment, mainly for export. The H-Genie is an electrochemical hydrogen generator capable of producing high purity hydrogen over a wide pressure range, mainly for laboratory needs. In parallel, the market assessment of electrochemical technology for the conversion of carbon dioxide and the exploration of business opportunities has been initiated.

On 1 February 2022, the ownership structure changed and the company changed its name to eChemicles Zrt. As part of the transformation, the H-Genie business was sold and at the same time the ownership of the industrial property rights previously held by ThalesNano Zrt. and the University of Szeged (SZTE) related to the carbon dioxide technology developed by ThalesNano Zrt. At the same time, it acquired exclusive exploitation rights for the industrial property rights held by SZTE under a licence agreement.

Since the transformation, the company has been working to further develop and commercialise its carbon conversion technology by attracting tender funding and developing its industrial property portfolio. It has successfully applied for domestic and direct EU R&D programmes, raised funds and started development activities. The aim is to create a containerised prototype of the carbon dioxide conversion electrolysis technology and to start commercialisation activities. Investor funding has also been raised to accelerate the commercialisation process. The development activity is taking place at the Science Park in Szeged. The above mentioned projects are hereinafter referred to collectively in this Information Note as "**Projects**".

For more information please visit our website: <https://www.echemicles.com/>

As the data controller, eChemicles Zrt. processes your personal data (hereinafter referred to as "**data subject**") as the data subject in accordance with this privacy policy (hereinafter referred to as "**notice**" or "**policy**"). eChemicles Zrt. processes your personal data in accordance with the applicable laws and the provisions of this policy.

If you do not understand any part of this policy or have any questions, please feel free to contact us at the contact details set out in the Contact Us section of this policy so that we can answer your questions.

eChemicles Zrt. processes your personal data only for the purposes and purposes of processing set out in this Policy. We will process your data only to the extent, for the time and in the manner necessary, as we attach the utmost importance to respecting your privacy and your right to information self-determination. In order to keep your data secure, eChemicles Ltd. will take all necessary and available security measures, both technically and in terms of the procedures and activities of the persons involved in the processing.

This notice describes the details and rules of the data processing of eChemicles Zrt., which apply to both the data controller and its partners involved in the processing.

eChemicles Zrt. processes the above personal data primarily in order to achieve the objectives stated in the above-mentioned Projects. In the course of processing your personal data, the data controller is responsible for the processing of the personal data of eChemicles Zrt.

"Controller" means the natural or legal person who, alone or jointly with others, determines the purposes and means of the processing of personal data.

Several persons or actors are involved in the data processing carried out by eChemicles Zrt.

In connection with data processing, eChemicles Zrt. may use the assistance of other companies in the implementation of data processing purposes (e.g. accounting, server services, etc.). In such cases, the partner company involved in the processing of your personal data will act as a data processor.

A **"Processor"** is a natural or legal person who processes personal data on behalf of the controller and who mostly only carries out instructions or does not take decisions with regard to the processing, or does not determine the means of processing.

The data controller eChemicles Zrt. is primarily responsible for the data processing towards the data subjects. The data processor is liable for damages only if it has breached the rules applicable to the data processor or has not followed the lawful instructions of the data controller. The controller shall be solely liable for any errors made by the controller. eChemicles Zrt. therefore receives your personal data directly from you.

You may object to the processing

As the data subject, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation. In such a case, the controller, i.e. eChemicles Zrt., may no longer process the personal data, unless the controller proves that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.

2. The specific processing

2.1. Data processing by eChemicles Zrt. in relation to its investors

Purpose of data processing

In its projects, eChemicles Zrt. is constantly looking for partners to help accelerate the industrialisation of its technologies.

We process your personal data for the purposes of cooperation.

Expected impact of the processing on the data subject

The processing does not give rise to any particular effects or present any particular risks for the data subject. The processing is necessary for the purposes of cooperation.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Persons, scope and type of data subjects concerned by the processing

Who are or wish to become an investor in eChemicles Zrt. For the purposes of data processing, the person whose personal data is processed is referred to as the "**data subject**".

The personal data processed

We process the following personal data about you:

For a natural person investor:

Personal identification data	Name, address, tax identification number of the investor
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Contact details	Investor's e-mail address, telephone number
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For a legal person investor:

Identification data	Investor's company name, registered office, name of representative, contact name, tax number
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Contact details	E-mail address, telephone number of the investor's representative, contact person
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Legal basis for processing

The processing of your data is necessary for the performance of the contract. We process your personal data only in connection with the performance of the contract.

The processing of personal data is lawful under Article 6(1)(b) of the GDPR if the processing is **necessary for the performance of a contract** to which the data subject is a party or is necessary for the purposes of taking steps at the request of the data subject prior to entering into a contract.

The legal basis is Article 6(1)(f) of the GDPR. The processing is **necessary for the purposes of the legitimate interests pursued by the controller or a third party**, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child.

Who has access to your personal data

The personal data of the data subject as defined above may be accessed by eChemicles Zrt. and its employees who carry out the processing. In addition, the following data processors may have access to your personal data:

Server provider and IT system maintenance.

If you would like more information about Server and IT System Maintenance, please contact us via email at info@echemicles.com.

Whether the data subject is obliged to provide personal data

You are not obliged to provide your personal data. However, if you do not provide this personal data, you will not be able to cooperate with eChemicles Ltd., so providing the above personal data is in our mutual interest.

Data processing and storage period

We process your data for the duration of the contract. After the termination of the contract, eChemicles Zrt. may process your personal data necessary for the enforcement of its legitimate interests. On this basis, your personal data may be processed for a general limitation period of 5 years for the purpose of pursuing your legitimate interests in relation to your orders.

Transfer of personal data to a third country

The personal data of the data subject will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

No profiling is carried out through our company in connection with the above data processing. Our company does not engage in profiling.

2.2. Data processing by eChemicles Zrt. in relation to its cooperation partners

Purpose of data processing

Through its projects, eChemicles Zrt. works with industry partners and quality third parties first to customize our SolarCO 2 Value TM technology to produce the chemical product at the scale, process conversion and efficiency required by their customers.

We process your personal data for the purposes of cooperation.

Expected impact of the processing on the data subject

The processing does not give rise to any particular effects or present any particular risks for the data subject. The processing is necessary for the purposes of cooperation.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Persons, scope and type of data subjects concerned by the processing

Who are or who wish to become a partner of eChemicles Zrt. For the purposes of data processing, the person whose personal data is processed is referred to as the "data subject".

The personal data processed

We process the following personal data about you:

For a natural person partner:

Personal identification data	Partner name, address, tax identification number
Contact details	Partner e-mail address, phone number

For legal person partners:

Identification data	Partner's company name, registered office, name of representative, contact name, tax number
Contact details	E-mail address, telephone number of the partner's representative, contact person

Legal basis for processing

The processing of your data is necessary for the performance of the contract. We process your personal data only in connection with the performance of the contract.

The processing of personal data is lawful under Article 6(1)(b) of the GDPR where the processing is **necessary for the performance of a contract** to which the data subject is a party or for the purposes of taking steps at the request of the data subject prior to entering into a contract.

The legal basis is Article 6(1)(f) of the GDPR. The processing is **necessary for the purposes of the legitimate interests pursued by the controller or a third party**, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child.

Who has access to your personal data

The personal data of the data subject as defined above may be accessed by eChemicles Zrt. and its employees who carry out the processing. In addition, the following data processors may have access to your personal data:

Server provider and IT system maintenance.

If you would like more information about Server and IT System Maintenance, please contact us via email at info@echemicles.com.

Whether the data subject is obliged to provide personal data

You are not obliged to provide your personal data. However, if you do not provide this personal information, you will not be a partner with eChemicles Zrt. and therefore it is in our mutual interest that you provide us with the above personal information.

Data processing and storage period

We process your data for the duration of the contract. After the termination of the contract, eChemicles Zrt. may process your personal data necessary for the enforcement of its legitimate interests. On this basis, your personal data may be processed for a general limitation period of 5 years for the purpose of pursuing your legitimate interests in relation to your orders.

Transfer of personal data to a third country

The personal data of the data subject will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

No *profiling* is carried out through our company in connection with the above data processing. Our company does not engage in profiling.

"Profiling" is any form of automated processing of personal data whereby personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

The purpose of profiling is to offer you products that are more interesting and relevant to you, or to provide you with products that are better suited to your shopping habits. Profiling only

covers your shopping habits and preferences. Profiling does not impose any adverse consequences or restrictions of any kind on you.

2.3. Data processing by eChemicles Zrt. in connection with sales

Purpose of data processing

The aim of eChemicles Zrt. is to accelerate global research into CO₂ electrolysis. In order to develop new catalysts, gas diffusion layers and ion exchange membranes, the R&D community needs electrolysis cells that enable high current density operation. With this goal in mind, the data controller has developed a simplified, easy-to-assemble test cell for the R&D community (hereinafter referred to as the **Product**).

The commercial activities of eChemicles Zrt. in connection with the Product require data processing in order for you to place your order for the Product and for us to fulfil your orders. We process your personal data in order to fulfil your order.

Expected impact of the processing on the data subject

The processing does not give rise to any particular effects or present any particular risks for the data subject. The processing is necessary for the purposes of cooperation.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Persons, scope and type of data subjects concerned by the processing

Those who are interested in eChemicles Zrt. eC eChemichems product. For the purposes of data processing, the person whose personal data is processed is referred to as the "**data subject**".

The personal data processed

We process the following personal data about you:

For natural person customers:

Personal identification data	Name, address and tax identification number of the customer
Contact details	Customer's e-mail address, telephone number

For a legal person ordering:

Dr. Péter Juhász, lawyer - <https://www.adatjog.hu>

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Identification data	Company name, registered office, representative name, contact name, tax number of the customer
Contact details	E-mail address, telephone number of the Customer's representative, contact person

Legal basis for data processing

The processing of your data is necessary for the performance of the contract. We process your personal data only in connection with the performance of the contract.

The processing of personal data is lawful under Article 6(1)(b) of the GDPR if the processing is **necessary for the performance of a contract to** which the data subject is a party or is necessary for the purposes of taking steps at the request of the data subject prior to entering into a contract.

The legal basis is Article 6(1)(f) of the GDPR. The processing is **necessary for the purposes of the legitimate interests pursued by the controller or a third party**, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child.

Who has access to your personal data

The personal data of the data subject as defined above may be accessed by eChemicles Zrt. and its employees who carry out the processing. In addition, the following data processors may have access to your personal data:

Server provider and IT system maintainer.

If you would like more information about Server and IT System Maintenance, please contact us via email at info@echemicles.com.

Whether the data subject is obliged to provide personal data

You are not obliged to provide your personal data. However, if you do not provide this personal information, you will not be able to place an order with eChemicles Zrt. Product.

Data processing and storage period

We process your data for the duration of the contract. After the termination of the contract, eChemicles Zrt. may process your personal data necessary for the enforcement of its legitimate interests. On this basis, your personal data may be processed for a general limitation period of 5 years for the purpose of pursuing your legitimate interests in relation to your orders.

Transfer of personal data to a third country

The personal data of the data subject will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

No *profiling* is carried out through our company in connection with the above data processing. Our company does not engage in profiling.

Dr. Péter Juhász, lawyer - <https://www.adatjog.hu>

It is protected by copyright.

"Profiling" means any form of automated processing of personal data whereby personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

The purpose of profiling is to offer you products that are more interesting and relevant to you, or to provide you with products that are better suited to your shopping habits. Profiling only covers your shopping habits and preferences. Profiling does not impose any adverse consequences or restrictions of any kind on you.

2.4. Data processing in connection with the purchases of eChemicles Zrt.

Purpose of data processing

In the course of its activities, eChemicles Zrt. carries out procurement activities. This activity and the processing of data necessary for the performance of this activity is necessary for the performance of its activities.

Expected impact of the processing on data subjects

The processing does not give rise to any particular effects or present any particular risks for the data subject. The processing is necessary for the performance of its activities.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Persons, scope and type of data subjects concerned by the processing

For the purposes of data processing, the person whose personal data are processed is referred to as the **"data subject"**. In this processing, the data subjects are typically those from whom the controller orders or supplies.

The personal data processed

The following personal data is processed by eChemicles Zrt. in order to fulfil orders:

In the case of a natural person supplier:

Personal identification data

Supplier name, address

Contact details

Supplier's e-mail address, telephone number

For legal person suppliers:

Dr. Péter Juhász, lawyer - <https://www.adatjog.hu>

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Identification data	Supplier's company name/ Supplier's name, registered office/ delivery address, tax number, bank account number
Contact details	E-mail address, telephone number of the supplier's representative, contact person

Legal basis for data processing

The processing of personal data is lawful under Article 6(1)(b) of the GDPR where the processing is **necessary for the performance of a contract** to which the data subject is a party or for the purposes of taking steps at the request of the data subject prior to entering into a contract.

Who has access to your personal data

The personal data of the data subject as defined above may be accessed by eChemicles Zrt. and its employees who carry out the processing.

In addition, the personal data of the data subject as defined above may be accessed by the following processors:

Server provider and IT system maintenance.

Accountant.

If you would like more information about Server and IT System Maintenance, Accountant, please contact us via e-mail at info@echemicles.com.

Whether the data subject is obliged to provide personal data

You are not required to provide any personal data necessary for the delivery. However, if you do not provide such personal data, the Data Controller will not be able to place an order with the Supplier. Thus, providing this information is in our mutual interest.

Data processing and storage period

eChemicles Zrt. may process your personal data necessary for the exercise of its legitimate interests. On this basis, your personal data may be processed for a general limitation period of 5 years for the purpose of pursuing your legitimate interests in connection with your transport claims.

Transfer of personal data to a third country

Your data will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

No automated decision-making or profiling is carried out in relation to the processing of the data subject's data.

2.5. Handling of delivery data of eChemicles Zrt. customers

Purpose of data processing

eChemicles Zrt. will fulfil your order and deliver the ordered Product to you. In connection with the delivery, eChemicles Zrt. will process the customer's delivery data. The purpose of this processing is to enable eChemicles Zrt. to fulfil its obligation to deliver the ordered Product to you.

Expected impact of the processing on data subjects

The processing does not give rise to any particular effects or present any particular risks for the data subject. The processing is necessary in order to deliver the Product to the recipient.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Persons, scope and type of data subjects concerned by the processing

For the purposes of data processing, the person whose personal data are processed is referred to as the "**data subject**". In this processing, the data subjects are typically those who order products from the controller.

The personal data processed

The following personal data is processed by eChemicles Zrt. in order to fulfil orders:

For natural person customers:

Personal identification data	Name of Customer/Designee, delivery address
Contact details	Customer's/addressee's e-mail address, telephone number

For a legal person ordering:

Identification data	Company name of the customer/address of the registered office/address of delivery
Contact details	E-mail address, telephone number of the Customer's/designated representative, contact person

Legal basis for processing

The reason and basis (legal basis) for the processing of the personal data of the customer is to enable eChemicles Zrt. to deliver the product purchased by you to the address you have provided, and thus **to fulfil its contractual obligations**.

Who has access to your personal data

The personal data of the data subject as defined above may be accessed by eChemicles Zrt. and its employees who carry out the processing.

In addition, the personal data of the data subject as defined above may be accessed by the following processors:

Server provider and IT system maintenance.

If you would like more information about Server and IT System Maintenance, Accountant, please contact us via e-mail at info@echemicles.com.

The data controller sends parcels with the following parcel service provider, but does not have a permanent contractual relationship with them, so it has the possibility to use other parcel service providers:

Company name: Magyar Posta Zrt.
Head office: 1138 Budapest, Dunavirág utca 2-6.

Whether the data subject is obliged to provide personal data

You are not required to provide any personal data necessary for the delivery. However, if you do not provide such personal data, the controller will not be able to have the Product shipped. In this case, you will be able to collect the Product at a pre-arranged place and time.

Data processing and storage period

eChemicles Zrt. may process your personal data necessary for the exercise of its legitimate interests. On this basis, your personal data may be processed for a general limitation period of 5 years for the purpose of pursuing your legitimate interests in connection with your transport claims.

Transfer of personal data to a third country

Your data will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

No automated decision-making or profiling is carried out in relation to the processing of the data subject's data.

2.6. Data management in connection with invoicing and accounting by eChemicles Zrt.

Purpose of data processing

In accordance with the legislation in force, eChemicles Zrt. is obliged to issue an invoice to its customers for the value of the products purchased. In connection with the invoicing, eChemicles Zrt. handles the billing data of the customers. The purpose of this data processing is to enable eChemicles Zrt. to comply with its legal obligation to issue an accounting document for economic events.

Dr. Péter Juhász, lawyer - <https://www.adatjog.hu>
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Expected impact of the processing on data subjects

The processing does not give rise to any particular effects or present any particular risks for the data subjects. The processing is required on the basis of a contract in connection with the placing of an order.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Persons, scope and type of data subjects concerned by the processing

The customers of eChemicles Zrt. who use the eChemicles Zrt. eC eChemichem's product. For the purposes of data processing, the person whose personal data is processed is referred to as the "data subject".

The personal data processed

The following personal data is processed by eChemicles Zrt. for the purpose of invoicing and accounting:

For natural person customers:

Personal identification data	Name, address and tax identification number of the customer
Contact details	Customer's e-mail address, telephone number

For a legal person ordering:

Identification data	Company name, registered office, representative name, contact name, tax number of the customer
Contact details	E-mail address, telephone number of the Customer's representative, contact person

Furthermore, all data necessary for the communication necessary for the performance of invoicing and accounting.

Legal basis for data processing

The processing is necessary for compliance with a legal obligation to which the controller is subject.

Who has access to your personal data

The Customer's personal data as defined above may be accessed by eChemicles Zrt. and its employees who carry out the data management.

In addition, the personal data of the data subject as defined above may be accessed by the following processors:

Server provider and IT system maintenance.**Accountant.**

If you would like more information about Server and IT System Maintenance, Accountant, please contact us via e-mail at info@echemicles.com.

In order to comply with the legal obligations of eChemicles Zrt., your personal data will be transferred to the accountant of eChemicles Zrt.

By law, we may transfer your personal data to the National Tax and Customs Administration.

Whether the data subject is obliged to provide personal data

The data subject is obliged to provide the necessary information for the invoices to be issued in connection with his/her purchases, as the obligation to issue an invoice is required by law.

Data processing and storage period

Pursuant to Article 169 (1) - (2) of Act C of 2000 on Accounting, the invoice and the data required for its issue shall be kept for 8 years.

Transfer of personal data to a third country

Your data will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

No automated decision-making or profiling is carried out in relation to the processing of the data subject's data.

2.7. Processing of data of applicants for recruitment in connection with applications and CVs**Purpose of data processing**

The personal data of applicants for employment at eChemicles Zrt. are processed by the data controller eChemicles Zrt. for the purpose of assessing your application, application, CV and concluding an employment contract with the selected applicant.

Expected impact of the processing on the applicant for recruitment (data subject)

The processing does not give rise to any particular effects or present any particular risks for the applicant. The processing is necessary for the purposes of assessing the application for admission.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Persons, scope and type of data subjects concerned by the processing

Candidates for eChemicles Zrt. are those who wish to enter into an employment contract with eChemicles Zrt. For the purposes of data processing, the person whose personal data are processed is referred to as the "**data subject**". In this processing, the data subjects are typically the applicants for recruitment.

The personal data processed

The following personal data is processed by eChemicles Zrt. in order to assess applications for recruitment:

Identifying information:	the name of the candidate, the information given in his/her CV
Contact details:	applicant's telephone number, e-mail address

In addition, all data that is transmitted to the data controller during the recruitment application, CV, application or is necessary for the communication necessary for their assessment.

Legal basis for data processing

The processing of your data is necessary for the establishment of an employment contract. We process your personal data only in connection with the conclusion of the employment contract.

The processing of personal data is lawful under Article 6(1)(b) of the GDPR where the processing is **necessary for the performance of a contract** to which the data subject is a party or is necessary for the purposes of taking steps at the request of the data subject prior to entering into a contract; and e-commerce services.

Furthermore, processing is lawful under GDPR Preamble (44) if it is necessary in the context of a contract or the intention to enter into a contract.

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The legal basis for processing your personal data is the legitimate interest of the Data Controller following the assessment of your application.

Who has access to the personal data of the applicant (data subject)

The personal data of the applicant as defined above may be accessed by eChemicles Zrt. and its employees.

In addition, the personal data of the data subject as defined above may be accessed by the following processors:

Server provider and IT system maintenance.

If you would like more information about Server and IT System Maintenance, please contact us via email at info@echemicles.com.

Is the applicant (data subject) obliged to provide personal data

You are not obliged to provide your personal data. However, if you do not provide such personal data, eChemicles Zrt. will not be able to process your application, CV or resume and will not be able to establish an employment relationship with you. It is therefore in our mutual interest that you provide us with the above personal data.

Data processing and storage period

Your personal data will be stored by eChemicles Zrt. for 1 month after the evaluation of your application, CV or application.

If the application, CV, application for recruitment is evaluated or withdrawn, eChemicles Zrt. will delete your personal data within 1 month after the evaluation and withdrawal of the application, CV, application.

Transfer of personal data to a third country

The personal data of the applicant will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

No automated decision making or profiling takes place in relation to the processing of data of applicants.

2.8. Data processing in relation to the website of the Data Controller

Profiling is carried out on the website of the data controller through our company. Our company does not carry out profiling.

"Profiling" means any form of automated processing of personal data whereby personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

The purpose of profiling is to offer you products that are more interesting and relevant to you, or to provide you with products that are better suited to your shopping habits. Profiling only covers your shopping habits and preferences. Profiling does not impose any adverse consequences or restrictions of any kind on you.

We inform the data subjects that eChemicles Zrt. uses the following services within the framework of its website <https://echemicles.com/>:

Google: eChemicles Zrt. uses **Google Analytics** by **Google LLC.** as part of its website <https://echemicles.com/>. Google uses cookies to help analyse the use of this website. The primary purpose of this is to allow us to better target you with offers that match your interests. To do this, we need to be able to analyse your activity on our website with the help of Google.

The information stored by the cookie (including the user's IP address) is stored by Google LLC. on servers in the United States. Google LLC. may transfer the information collected to third parties where required to do so by law, or where such third parties process the information on behalf of Google LLC. The Google LLC. privacy policy is available at <http://www.google.hu/intl/hu/policies/privacy/>.

For more useful information about Google LLC.'s data practices and how to opt-out of cookies and personalise your ads, please visit the Google LLC. website at <http://www.google.com/intl/hu/policies/privacy/ads/>.

You can change your Google privacy settings here:
<https://privacy.google.com>.

2.9. Processing of data in connection with the contacting of the Controller's website

Purpose of data processing

The aim of eChemicles Ltd is to answer your questions when you ask us a question through our website.

Expected impact of the processing on the data subject (data subject)

The processing does not give rise to any particular effects or present any particular risks for the data subject. The processing is necessary to answer your question.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

head office: 6726 Szeged, Alsó kikötő sor 11.

location: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Dr. Péter Juhász, lawyer - <https://www.adatjog.hu>

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Persons, scope and type of data subjects concerned by the processing

The eChemicles Zrt. enquirers are those who ask eChemicles Zrt. questions via the website. For the purposes of data processing, the person whose personal data is processed is referred to as the "**data subject**". For the purposes of this processing, the data subjects are typically the persons who make enquiries via the website.

The personal data processed

The following personal data is processed by the controller in order to answer your question:

Identifying information: name of the questioner

Contact details: e-mail address of the enquirer

Legal basis for processing

This processing is based on your consent. The processing of personal data is lawful under Article 6(1)(a) of the GDPR if the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes.

Who has access to the personal data of the respondent (data subject)

The personal data of the applicant as defined above may be accessed by eChemicles Zrt. and its employees who are responsible for data processing.

In addition, the following processors may have access to your personal data:

Server provider and IT system maintenance.

If you would like more information about Server and IT System Maintenance, please contact us via email at info@echemicles.com.

Is the respondent (data subject) obliged to provide personal data

You are not obliged to provide your personal data. However, if you do not provide this personal information, you will not be able to contact eChemicles Ltd.

Data processing and storage period

Given that this processing is based on your consent, you may withdraw your consent at any time by sending a request to info@echemicles.com.

Transfer of personal data to a third country

The personal data of the respondent will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

No automated decision making or profiling is carried out in relation to the processing of the data of the respondent.

2.10. Activities of the Data Controller related to the sending of newsletters

Purpose of data processing

We deliver marketing messages and advertisements to you.

Please note that this processing is based on your consent and you can withdraw your consent at any time by contacting our customer service. If you withdraw your consent, we will not send you marketing newsletters thereafter.

Expected impact of data processing on the subscriber (data subjects)

The processing does not give rise to any particular effects or present any particular risks for the subscriber. In connection with the processing, subscribers will receive 1 notification per month of promotions from the controller.

Frequency of newsletters and offers: We will send you our newsletters once a month.

Our newsletters are sent electronically to your e-mail address.

Data controller and contact details

The data controller in the above processing is eChemicles Zrt.

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com

Persons, scope and type of data subjects concerned by the processing

Users of the <https://echemicles.com/> website who subscribe to the newsletter. For the purposes of data processing, the person whose personal data is processed is referred to as the "data subject".

The personal data processed

The following personal data of subscribers are processed by the data controller:

Identifying information: name of subscriber

Contact details: subscriber's e-mail address

Legal basis for data processing

The processing is based on the consent of the data subject. Consent may be given in electronic form or on paper.

The processing of personal data is lawful under Article 6(1)(a) of the GDPR where the data subject has given his or her **consent to** the processing of his or her personal data for one or more specific purposes.

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Who has access to the subscriber's (data subject's) personal data

The personal data of the data subject as defined above may be accessed by eChemicles Zrt. and its employees who carry out the processing.

In addition, the following processors may have access to your personal data:

Server provider and IT system maintainer.

If you would like more information about Server and IT System Maintenance, please contact us via email at info@echemicles.com.

Whether the subscriber (data subject) is obliged to provide his/her personal data

The subscriber is not obliged to provide the data required for sending newsletters when using the <https://echemicles.com/> website, but without the consent of the subscriber, the data controller will not be able to send you a newsletter.

Data processing and storage period

We will process the data until the data subject withdraws them.

This processing is based on your **consent** and you can withdraw your consent at any time by sending a request to info@echemicles.com. If you have withdrawn your consent, we will not send you marketing newsletters.

In this regard, we will process your data until your consent is withdrawn.

Transfer of personal data to a third country

Subscribers' data will not be transferred to third countries. By third country we mean countries that are not members of the European Union.

Automated decision-making and profiling in relation to data management

Profiling is not carried out in connection with the above processing.

2.11. Data processing in relation to the real estate at 9 Budapesti út, 6728 Szeged

We inform the data subjects that the data controller carries out its activities at the real estate located at 9, Budapesti út, 6728 Szeged.

The property is used by the data controller on the basis of a civil law contract with the University of Szeged.

Please be informed that the University of Szeged uses the following security devices when entering the property, which may also affect you if you enter the property in cooperation with eChemicles Zrt:

- camera system

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- card-based access control system

The data controller for this processing is the University of Szeged. We inform the data subject that eChemicles Zrt. is not involved in this data processing, neither as a data controller nor as a data processor. Therefore, if you have any questions in this regard, please contact the Data Protection Officer of the University of Szeged via the contact details below:

- Name: Dr. Dóra Lajkó, Ph.D. LL.M.
- Phone: +36 (62) 342-376
- E-mail address: dpo@szte.hu

2.12. Data processing in connection with social media services used by eChemicles Zrt.

Social media services:

We inform the data subjects that eChemicles Zrt. uses the following social media services:

- Twitter
- LinkedIn

Twitter, LinkedIn: eChemicles Zrt. uses the services of Twitter and LinkedIn, whereby your personal data may be transmitted to eChemicles Zrt. Please note that we may process this personal data for the purposes and in the manner set out in this notice, where necessary.

For information about Twitter's data activities and the scope of the data processed, please visit the following website: https://cdn.cms-twdigitalassets.com/content/dam/legal-twitter/site-assets/privacy-page-gdpr/pdfs/PP_Q22018_April_EN.pdf

For information about LinkedIn's data activities and the scope of the data processed, please visit the following website: https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy

3. Rights of data subjects whose personal data are processed in the course of the processing

As a data subject whose personal data is processed, you have the following rights in relation to the processing. Please note that you may exercise the rights set out below primarily against the controller. For the purposes of this processing, eChemicles Zrt. is the controller.

Your rights as a data subject in relation to data processing

- right to information,
- right of access,
- the right to rectification,
- the right to erasure, "the right to be forgotten",
- the right to limit,
- the right to protest,
- your right to data portability,
- the right to withdraw consent,
- right to complain,
- the right to judicial redress.

Right to information

General rules on the information of the data subject and the right to information

Before the processing starts, the data subject must be informed in detail by the controller at the latest when the personal data of the data subject are obtained. In relation to the processing, the information contained in this privacy policy.

The controller is responsible for providing prior information. In addition to the above prior information, you may request information from the controller at any stage of the processing, as follows. In this case, the controller shall provide the information without undue delay and at the latest within 25 days. The 25-day period may be extended by a maximum of 2 months only in justified cases.

The controller may refuse to provide the information only if it proves that the data subject cannot be identified.

If the controller does not take action, i.e. does not comply with the obligation to provide information, it must inform the data subject within 25 days of the failure to take action, the reasons for the failure to act and the data subject's right to lodge a complaint or to bring a case before a court. Details of how to lodge a complaint or seek judicial redress are set out below.

The information and action shall be provided by the controller to the data subject free of charge. However, the controller may exceptionally charge a reasonable fee or refuse to provide the information and take action where the data subject's request is manifestly unfounded, repetitive or excessive.

Right of access of the data subject

The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and the following information:

On the basis of the right of access, the data subject shall be informed, upon request, of the following information: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipients to whom or which the personal data have been or will be disclosed, including in particular recipients in third countries, or. (e) the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data; (f) the right to lodge a complaint with the supervisory authority (NAIH); (h) the existence or absence of automated decision-making, including profiling, and, at least in those cases, the logic used and clear information on the significance of such processing and its likely consequences for the data subject.

The data controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.

Where the data subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the data subject requests otherwise.

Right to rectification

The data subject shall have the right to obtain from the controller, upon his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her. Having regard to the purposes of the processing, the data subject shall have the right to obtain the rectification of incomplete personal data, including by means of a supplementary declaration.

Right to erasure, "right to be forgotten"

As a data subject, you have the right to obtain from the controller the erasure of personal data relating to you without undue delay, and the controller has the obligation to erase personal data relating to you without undue delay, if one of the following grounds applies:

- (a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- (b) where the processing is based on the data subject's consent (e.g. sending a newsletter) and the data subject withdraws his or her consent to the processing and there is no other legal basis for the processing;
- (c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- (e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- f) the personal data were collected in connection with the provision of information society services.

Where the controller has disclosed the personal data and is required to erase it pursuant to paragraph 1, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that the data subject has requested the deletion of the links to or copies of the personal data in question.

The controller shall not be obliged to comply with a request for erasure in the above cases where the processing is necessary: a) for the exercise of the right to freedom of expression and information; b) to comply with an obligation under Union or Member State law to which the controller is subject to which the processing of personal data is subject; or c) to comply with a request for erasure in the following cases. (c) on grounds of public interest in the sphere of public health; (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where the right of erasure would be likely to render impossible or seriously impair such processing; or (e) for the establishment, exercise or defence of legal claims.

Right to restriction of processing

The data subject shall have the right to obtain, at his or her request, the restriction of processing by the controller if one of the following conditions is met: (a) the data subject contests the accuracy of the personal data, in which case the restriction shall be for a period of time which allows the controller to verify the accuracy of the personal data; (b) the processing is unlawful and the data subject opposes the erasure of the data and requests instead that the use of the data be restricted; (c) the controller no longer needs the personal data for the purposes of the processing but the data subject requires them for the establishment, exercise or defence of legal claims; or (d) the data subject has objected to the processing, in which case the restriction shall apply for a period of time until it is established whether the legitimate grounds of the controller override the legitimate grounds of the data subject.

Where processing is restricted on the basis of the above, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State.

The data controller shall inform the data subject whose request for restriction of processing has been made on the basis of the above in advance of the lifting of the restriction.

Obligation to notify the rectification or erasure of personal data or the restriction of processing

The controller shall inform any recipient to whom or with which the personal data have been disclosed of the rectification, erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort.

The controller shall inform the data subject of these recipients at his or her request.

The right to data portability

The data subject shall have the right to receive personal data concerning him or her which he or she has provided to a controller in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without hindrance from the controller

to which he or she has provided the personal data, where: a) the processing is based on the data subject's consent (e.g. sending a newsletter) or on the performance of a contractual obligation between the parties; and b) the processing is carried out by automated means.

In exercising the right to data portability as set out above, the data subject shall have the right to request, where technically feasible, the direct transfer of personal data between controllers.

The exercise of the right to data portability must not prejudice the right to erasure. The right to data portability must not adversely affect the rights and freedoms of others.

Right to object

As a data subject, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation. In such a case, the controller may no longer process the personal data unless the 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 defence of legal claims.

Where personal data are processed for direct marketing purposes (e.g. sending marketing mail to customers), the data subject has the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

Right to withdraw consent

Where the legal basis for processing is the data subject's consent (e.g. sending a newsletter for marketing purposes), the data subject has the right to withdraw his or her consent at any time. However, the withdrawal of consent does not render the processing prior to the withdrawal unlawful.

4. Data security

Storage of personal data and security of processing

The IT infrastructure, storage and other data storage facilities of eChemicles Zrt. are located at its headquarters and premises.

The IT tools and solutions used for data processing, in particular security systems, are selected and used in such a way that the personal data processed are accessible to those authorised to access them, their authenticity and authentication are ensured, their integrity is verifiable and they are protected against unauthorised access.

We will take appropriate measures to protect your personal data, in particular against unauthorised access, alteration, data breach, data theft, data leakage, disclosure, transmission, alteration, deletion or destruction, accidental destruction or damage and inaccessibility due to changes in the technology used.

In order to protect the data files managed in its records, eChemicles Zrt. ensures by means of appropriate technical solutions that the stored data cannot be directly linked or attributed to the data subject, except in the case of legal authorisation.

In view of the current state of the art, we ensure the security and protection of our data processing by taking technical, organisational and organisational measures that provide an adequate level of protection for your personal data.

The IT system and network of eChemicles Ltd. and its partners are protected against dangerous human (e.g. fraud, espionage, sabotage, vandalism, computer viruses, computer intrusions, etc.), natural (e.g. fire and flood) or other (e.g. service outages, etc.) harmful intrusions. eChemicles Ltd. ensures the security of its data through server and software level protection procedures and services.

eChemicles Zrt. protects the processing of personal data so that only those who are entitled to access it have access to it (confidentiality), the accuracy and completeness of personal data and the method of processing (integrity), ensures that when authorized users need the personal data, they can actually access the data and that they are available (availability).

We inform the data subjects that personal data is partly transmitted to eChemicles Zrt. via the internet. Regardless of the protocol used (e-mail, web, ftp, etc.), the security of data and electronic messages transmitted over the Internet is vulnerable to network threats that could be used to commit fraudulent activity, to dispute a contract, or to disclose or modify information. To eliminate such threats, eChemicles Ltd. will take all reasonable security measures.

The data breach and its handling

According to the European Data Protection Regulation (GDPR), **a data breach is a** breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. A data breach is therefore any event or situation where your personal data could fall into unauthorised hands.

Dr. Péter Juhász, lawyer - <https://www.adatjog.hu>

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In the event of a data breach, we will notify the incident to the competent supervisory authority without undue delay, but no later than 72 hours after the data breach has come to our attention, or inform you as the data subject if the data breach is likely to result in a risk to the rights and freedoms of natural persons.

5. Legal remedies, right of complaint, judicial remedies

That is, what can you do if you think your personal data is not being processed correctly?

Right to complain

As a data subject, 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 personal data relating to you infringes the law. The competent supervisory authority in Hungary is the National Authority for Data Protection and Freedom of Information (NAIH).

The exercise of the right to complain does not exclude the possibility for you, as the data subject, to seek other administrative or judicial remedies if you consider that your personal data are being processed in a way that is unlawful. Thus, even if you exercise your right to complain, you may also exercise your right to seek administrative or judicial redress at the same time.

You can lodge a complaint with the National Authority for Data Protection and Freedom of Information, whose contact details are:

Name: National Authority for Data Protection and Freedom of Information

Head office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.

Telephone: 06 1 391 1400

Fax: 06 1 391 1410

Website: <http://www.naih.hu>

E-mail: ugyfelszolgalat@naih.hu

Right to judicial remedy against a decision of the NAIH or another supervisory authority

If you have applied to the supervisory authority (NAIH) in relation to your data processing and the authority has taken a decision in your case, you, as the data subject, have the right to seek judicial remedy against this decision, i.e. to challenge the decision in court. You have the right to judicial remedy even if the competent supervisory authority (NAIH) does not deal with the complaint or does not inform the data subject of the procedural developments or the outcome of the complaint within three months.

Proceedings against the supervisory authority (NAIH) must be brought before the courts of the Member State where the supervisory authority is established.

Right to judicial remedy against the controller or processor

As a data subject, you have the right to judicial remedy if you consider that your rights in relation to the processing of your personal data have been infringed as a result of the unlawful processing of your personal data. The exercise of the right to judicial remedy does not exclude the possibility for you, as the data subject, to seek other administrative or judicial remedies or to exercise your right to lodge a complaint if you consider that your personal data are being processed unlawfully.

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Proceedings against the controller or processor shall be brought before the courts of the Member State in which the controller or processor is established. In the case of eChemicles Zrt., the courts of the place of establishment shall be the courts of Hungary. While the competent court according to the seat of eChemicles Zrt. is the Szeged District Court or, in case of special jurisdiction, the Szeged Regional Court.

A judicial remedy may also be brought before the courts of the Member State in which the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in its exercise of official authority.

Liability and damages

In other words, how is the controller or processor liable to the data subject in the event of damage?

If the inappropriate processing has caused damage to you as the data subject, the controller is liable for compensation for the damage. Damage can be said to have occurred if the processing was unlawful or in breach of contract and the data subject suffered financial loss as a result. In the case of unlawful processing, the data subject may also claim damages.

You may pursue your claim for damages or compensation primarily against the controller. The processor is only liable for damages if it has only breached the rules applicable to it or has not followed the lawful instructions of the controller. In other words, the processor is not liable for errors made by the controller.

6. List of legislation applicable to data processing

REGULATION (EU) No 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation) (**GDPR**);

Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (**Infotv.**);

Act C of 2000 - on Accounting (**Act on Accounting**);

Act CLV of 1997 - on Consumer Protection (**Fgy. tv.**);

Act V of 2013 - on the Civil Code (**Civil Code**).

7. Contact us

If you have any questions about the processing of your personal data or if you wish to exercise your rights in relation to our processing, please contact eChemicles Zrt. as the data controller.

The contact details of eChemicles Zrt. are:

Seat: 6726 Szeged, Alsó kikötő sor 11.

Place of business: 6728 Szeged, Budapesti út 9.

We inform the data subjects that the controller carries out its activities on its premises.

e-mail: info@echemicles.com

web: <https://echemicles.com>

Representative of eChemicles Zrt.: Dr. Csaba Janáky CEO

Representative's e-mail address: info@echemicles.com