2Connect Távközlési Infrastruktúra és Hálózati
Szolgáltatások Korlátolt Felelősségű Társaság
1013 Budapest, Krisztina krt. 39.

2CONNECT TELECOMMUNICATION INFRASTRUCTURE & NETWORK SERVICES LTD. PRIVACY NOTICE

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1. Introduction

2Connect Telecommunications Infrastructure & Network Services Ltd. (hereinafter: 2Connect) provides information on its data processing activities in accordance with the provisions of the General Data Protection Regulation (hereinafter: GDPR), including the exercise of data subjects' rights and the available legal remedies.

2. Name and contact details of the data controller and data protection officer

Name	2Connect Telecommunications Infrastructure & Network Services Ltd.
Registered seat	1013 Budapest, Krisztina körút 39.
Postal address	1013 Budapest, Krisztina körút 39.
Email	wholesale@2Connect.hu
Telephone	06-80-888-200, from abroad: 06-1-873 6996

Data protection officer	ARB Privacy Kft.
Postal address	1013 Budapest, Krisztina körút 39.
Email	dpo@2Connect.hu

3. Rules for exercising data subject rights

How can data subjects exercise their rights?
Data subjects may exercise their rights under the GDPR at any time by submitting a request to 2Connect via any of its contact details, either verbally, in writing or electronically.

What does the right of access entitle you to?
Data subjects are entitled to request confirmation at any time from 2Connect to whether or not personal data concerning him or her are being processed. Data

subjects have the right and opportunity to find out at any time what data the service provider holds about them and under what circumstances, and may also request a copy of their personal data. A copy of the personal data may be made available to the data subject in a widely used, computer-readable format (PDF/XML) or in a printed version on paper. The request for a copy is free of charge.

What does the rectification of personal data mean?
The data subject may request the rectification of inaccurate personal data concerning him or her, or the completion of incomplete personal data. As long as the data cannot be corrected or supplemented due to a lack of additional information, the data controller shall restrict the processing of the personal data concerned and temporarily suspend operations involving them, with the exception of storage.

When can the right to erasure be exercised?
The data subject may request the erasure of personal data concerning him or her if 2Connect no longer needs them or if the data subject has concerns about the lawfulness of the processing of his or her data. If there is an obligation to erase the personal data processed, 2Connect will terminate the processing and delete/anonymise the data.

What does the right to restriction of processing mean?
The data subject may request the restriction of the processing of personal data concerning him or her if he or she has concerns about the lawfulness of the data processing and requests the blocking of the data instead of its erasure, or if 2Connect no longer needs the data but the data subject requires it for the establishment, exercise or defence of legal claims. During the period of restriction, 2Connect will not perform any operations on the personal data, except for storage. The blocking may only be lifted in exceptional cases specified in the GDPR, of which 2Connect will inform the data subject in advance.

What are the cases for the right to object?
The data subject may object to the processing of their personal data if the processing is based on the legitimate interests of the data controller. In this case, 2Connect will block the personal data for a period of time that allows it to determine whether there are compelling legitimate grounds that require the processing to continue (such as when the interests, rights or freedoms of the data controller take precedence, or when the use of the data is necessary for the establishment, exercise or defence of legal claims). In the absence of such grounds, 2Connect will terminate the processing and delete/anonymise the data.

How is it possible to exercise rights after the death of the data subject?
Within 5 years of the death of the data subject, the rights of access, rectification, erasure, restriction of processing, and objection may be exercised by the person authorised by the data subject in an administrative provision or in a public document/private document of full probative force

by means of a declaration made to IGI-INFRA. In the absence of a declaration, the rights to rectification and objection, as well as – if the data processing was already unlawful during the data subject's lifetime or the purpose of the data processing ceased to exist upon the data subject's death – the rights to erasure and restriction of data processing may also be exercised by a close relative of the data subject (spouse, direct relative, adopted/step/foster child, adoptive/step/foster parent, sibling).
The person exercising the rights shall be required to prove the fact and time of death of the person concerned by means of a death certificate or court decision, as well as his or her own identity – and, where applicable, his or her status as a close relative – by means of a public document. Subsequently, this person shall be entitled to the rights and subject to the obligations established for the data subject.

4. Legal remedy

If 2Connect has handled the personal data of the data subject in an inappropriate manner, contrary to the relevant legislation, or if it has not complied with or has not adequately complied with a request to exercise rights, the data subject is entitled to lodge a complaint with the data protection supervisory authority at the following contact details:

Name	**National Authority for Data Protection and Freedom of Information (NAIH)**
Registered seat	1055 Budapest, Falk Miksa utca 9-11.
Postal	1363 Budapest, Pf.: 9.
Email	ugyfelszolgalat@naih.hu
Tel	+36 (30) 683-5969, +36 (30) 549-6838, +36 (1) 391-1400
Fax	+36 (1) 391-1410

5. Data processing

What data processing does 2Connect perform in connection with requests for quotes via the website?
2Connect provides a quotation request option for its products and services on its website via general quotation request forms. The data recorded for the purpose of submitting the quotation request form (name, company name, e-mail address, telephone number) will be processed on the basis of the Data Controller's legitimate economic interest in providing its services (GDPR Article 6(1)(f)). If a contract is concluded following the request for quotation, 2Connect will process the data for 5 years after the termination of the contract [the limitation period specified in Section 6:22(1) of Act V of 2013 on the Civil Code (hereinafter: Civil Code)]. If no contract is concluded between the parties after the form has been completed, 2Connect shall delete the data recorded on the data sheet within 30 days of the final conclusion of the communication.

How does 2Connect handle the personal data of representatives of corporate partners?
2Connect processes the contractual data of representatives of its contracting partners and sole traders for the purpose of concluding the relevant contract. Data processing is based on 2Connect's legitimate interest in concluding and performing the contract (Article 6(1)(f) of the GDPR) and, in the case of sole traders, on the conclusion and performance of the contract (Article 6(1)(b) of the GDPR). 2Connect processes and stores the data processed in this manner for 5 years after the termination of the contract [the limitation period specified in Section 6:22(1) of the Civil Code].

How do you establish and maintain contact with business partners?
Anyone can contact 2Connect with questions and get in touch with the Data Controller by email, phone, or post. The Data Controller also provides the option to send messages and get in touch via the contact form on its website (by filling in your name, company name, email address, phone number, and free text field) to send messages or keep contact. If a contract is signed after preliminary communication, 2Connect and the partner will keep each other informed about facts and circumstances related to the contract during the term of the legal relationship. In doing so, 2Connect will communicate with the persons designated as contact persons by the partner's representative, for which purpose it will record and use information relating to the data subject (name, place of work, position, authority, telephone number, email address). Data processing is based on the legitimate interest of 2Connect in providing its services and concluding and performing the contract (GDPR Article 6(1)(f)), and in the case of sole traders, on the conclusion and performance of the contract (GDPR Article 6(1)(b)). If no contractual relationship is established between the parties after the initial contact, 2Connect will delete the personal data within 30 days of the contact. If a contract is concluded between the parties, 2Connect will process and store personal data related to the initial contact and communication for 5 years after the termination of the contract (in accordance with the limitation period specified in Section 6:22 (1) of Act V of 2013 on the Civil Code).

What are the retention obligations under accounting rules?
In accordance with our legal obligations under accounting regulations, 2Connect is required to retain accounting documents directly and indirectly supporting bookkeeping records, including general ledger accounts, analytical and detailed records, in a legible form, in a manner that can be retrieved based on references in the accounting records [Section 169(2) of Act C of 2000 on Accounting (hereinafter: Accounting Act) and Article 6(1)(c) of the GDPR]. This obligation shall remain in force for 8 years [retention obligation pursuant to Section 169(2) of the Accounting Act].

6. Recipients

Which data processors are involved in data processing?
The following data processors perform their activities related to specific data processing on behalf of and for the benefit of 2Connect, based on a

contract concluded with 2Connect:

a) Microsoft Ireland in relation to the O365 service;
b) 4iG Nyrt. in connection with outsourced legal and procurement services and website maintenance;
c) One Magyarország Zrt. in relation to website hosting services;
d) Elementary Interactive Kft. in connection with website development and maintenance.

Is data transferred to third countries?

Personal data may be transferred to the United States or any other country where Microsoft Corporation, its subsidiaries or additional data processors operate by Microsoft Ireland Ltd., the provider of the Office 365 email system, as a data processor. Data transfers by Microsoft Ireland Ltd. are carried out in accordance with Chapter V of the GDPR. Microsoft Corporation is listed in the EU-US Privacy Shield Framework, which, according to the European Commission's Implementing Regulation of 10 July 2023, ensures an adequate level of protection for personal data.