

DATA PROTECTION NOTICE

INRIMAS Ltd.

INRIMAS Ltd., as a data controller, respects the privacy of all individuals who provide personal data to it and is committed to protecting such data. Pursuant to Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, hereinafter: “GDPR”), the Company provides the following information.

INRIMAS Ltd. processes personal data recorded by it in a confidential manner, in compliance with applicable data protection laws and international recommendations, in accordance with this Data Protection Notice (hereinafter: the “Notice”), and implements all necessary security, technical, and organizational measures to ensure data security. This Notice sets out the principles of processing personal data provided by Data Subjects.

The purpose of this Notice is to provide detailed information to persons who, during the use of services provided by the Controller (hereinafter: “Services”), enter into customer relationships with INRIMAS Ltd. (hereinafter: “Company” or “Controller”), or to contractual and cooperating partners, as well as persons entering the Company’s registered office (hereinafter: “Customers”), and visitors to the Company’s website www.inrimas.hu (hereinafter: “Website”) (collectively: “Data Subjects”), regarding all essential facts relating to the processing of their personal data, in particular the purposes and legal bases of processing, the persons authorized to carry out data processing and data processing operations, the duration of processing, and who may access the data, in accordance with the GDPR.

For other data processing activities, the Company provides separate notices, policies, or information at the time of data collection.

The current version of this Notice is continuously available on the Company’s website. The Data Subject acknowledges and accepts the following provisions and consents to the data processing described herein.

Company Details

Company name:	INRIMAS Limited Liability Company
Registered seat:	1046 Budapest, Klauzál utca 10., Hungary
Company registration number:	01-09-417899
Website:	www.inrimas.hu
Representative:	József Kerékgyártó, Managing Director
Phone:	+36 30 322 29 05
E-mail:	info@inrimas.hu
Data protection contact:	info@inrimas.hu



1. Scope of Data Subjects and Applicability of the Notice

This Notice applies to all individuals whose personal data are processed by the Company for business purposes, as well as to individuals whose personal data are provided to the Company. By transmitting their personal data to the Company, the Data Subject acknowledges and accepts the provisions of this Notice and consents to the processing of their data in accordance with it.

This Notice applies to the Company as Data Controller, as well as to all individuals whose data are subject to the processing activities described herein, and to all persons whose rights or legitimate interests may be affected by such processing. The Company primarily processes the personal data of natural persons who, for example, contact the Company via email at info@inrimas.hu, by telephone, or in person for the purpose of establishing a business relationship, requesting an offer, or using the Company's services, or who contact the Company for any other purpose, as well as persons entering the Company's registered office.

The Company also processes the personal data of its individual customers, as well as representatives and contact persons of legal entity customers, and other persons whose data are provided to the Company by its clients. Where the Data Subject and the person providing the personal data are not the same, the person providing the data is responsible for ensuring that they have proper authorization from the Data Subject and for informing the Data Subject about the contents of this Notice.

This Notice applies to all data processing activities of the Company, whether carried out electronically or on paper.

This Notice is effective from 1 July 2026 until further notice or its withdrawal. The Company reserves the right to unilaterally amend this Notice at any time.

2. Definitions

For the interpretation of this Notice, the following definitions shall have the meanings set out below:

“Personal data”: any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location

data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Processing”: any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Data controller”: the Company, as well as any natural or legal person or other body which alone or jointly with others determines the purposes and means of the processing of personal data.

“Data processor”: any natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller.

“Recipient”: any natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether or not they are a third party. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by such public authorities shall comply with applicable data protection rules in accordance with the purposes of the processing.

“Third party”: any natural or legal person, public authority, agency or body other than the data subject, the data controller, the data processor, or persons who, under the direct authority of the controller or processor, are authorised to process personal data.

“Consent of the data subject”: any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which they signify agreement to the processing of personal data relating to them, by a statement or by a clear affirmative action.

“Special category data”: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic and biometric data for the purpose of uniquely identifying a natural person, health data, and data concerning a natural person’s sex life or sexual orientation.



“Health data”: personal data related to the physical or mental health of a natural person, including data on healthcare services provided to the natural person which reveal information about their health status.

“Data transfer”: making personal data available to a specified recipient.

“Data breach”: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

The other definitions provided by the GDPR are set out in Article 4 thereof.

3. Data processing purposes and legal bases, applicable legal certainty, and storage of personal data

General purposes of data processing carried out by the Company:

- a) Processing of personal data of service users and, in the case of corporate clients, their employees or natural persons whose data are provided by the clients, in connection with the Company's activities and services, for the purposes of preparing, concluding, and performing contracts, fulfilling legal obligations, and maintaining customer relationships;
- b) Processing of the data subject's data in relation to the enforcement of rights and performance of obligations arising from the contractual relationship (including the use of services, fulfilment of orders, and processing of client contact persons' data);
- c) Processing of personal data of potential clients for direct marketing purposes based on the Company's legitimate interest;
- d) Fulfilment of legal obligations of the data subject and the Company, and enforcement of their legitimate interests;
- e) Transfer of the data subject's data to business partners where necessary, where it facilitates the provision of services to the data subject and the data subject has given prior consent;



- f) f) After termination of the contractual relationship with the Company, exercising rights and fulfilling obligations arising from the contract or service provision, in particular enforcing claims arising from the contract or service.

Legal bases for data processing:

- a) The primary legal basis for data processing is the prior, voluntary consent of the data subject based on prior information provided by the Company. The general purpose is to ensure service provision and communication. The Company also processes data for the performance of the service, compliance with legal obligations applicable to it, and the enforcement of the legitimate interests of the parties.
- b) In the case of voluntary data provision by the data subject, the Company processes personal data with the consent of the data subject. Voluntary consent also includes the conduct whereby the data subject, by using the website, accepts that all rules related to website use, including this Privacy Notice, automatically apply to them.
- c) The data subject has the right to withdraw consent at any time; however, under the GDPR, where personal data were collected based on consent, the Company may continue processing such data—without further consent—if required for compliance with a legal obligation or for the purposes of legitimate interests pursued by the Company or a third party, provided that such interests are proportionate to the restriction of data protection rights. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal. In cases required by law, data processing is mandatory.
- d) Where the data subject and the person providing personal data are not the same, the provider is responsible for ensuring that they have proper authorisation from the data subject and must inform the data subject about the provisions of this Privacy Notice.
- e) The Company draws attention to the fact that failure to provide data may, in certain cases, make business communication or service delivery more difficult or impossible, and that providing certain data may be a condition for using the services.

Scope, limitations and principles of data processing

Personal data is processed only to the extent and for the duration necessary to achieve the purposes defined above. Only personal data that is essential and suitable for achieving the purpose of processing may be processed.

The Company takes all necessary measures to ensure that personal data is accurate, complete, and up to date. However, since data subjects are responsible for the accuracy of the data provided, they must report any changes as soon as possible, but no later than within 3 working days, and provide updated data to the Company via the contact details specified in this Notice.

Source of data

The Company obtains the personal data either directly from the data subjects or from its clients, who provide the data of their employees, contributors, or business partners as data subjects.

Duration of data processing

The duration of data processing is as follows, noting that specific processing purposes may define different retention periods, which shall take precedence:

As a general rule, data processing lasts until:

- i) the purpose of processing has been fulfilled and the personal data is deleted;
- ii) the withdrawal of consent and subsequent deletion of the data;
- iii) the enforcement of a court/authority decision ordering deletion;
- iv) the expiry of limitation periods for enforcing rights and obligations arising from the legal relationship underlying the processing, unless otherwise provided by law. Under Act V of 2013 on the Civil Code, this limitation period is 5 years.

In the case of mandatory data processing based on law, the applicable legislation defines the retention period. In relation to issued invoices, data must be retained for 8 years in accordance with the Act on Accounting and the Act on Taxation.

Unless otherwise specified in individual processing purposes, personal data is retained for the above general period and then deleted, or deleted upon request or upon withdrawal of consent.

Review of personal data



To ensure that storage of personal data is limited to the necessary period, the Data Controller establishes regular review or deletion deadlines. The Company's defined review period is 1 year.

4. Description of individual data processing activities:

Processing of website visitors' data

During access to the Website, certain data generated during the visit may be automatically recorded on the server hosting the Website. The automatically recorded data is logged by the system upon entry to and exit from the Website, without any separate declaration or action by the data subject (hereinafter: "User"). These data are processed for the shortest necessary period required for service provision and system security purposes—typically less than one day—after which they are overwritten, i.e., deleted. Such data may include, for example: IP address, browser data, and visit parameters.

Purpose of data processing: During visits to the Website, the hosting provider records visitor data for the purpose of monitoring system operation and preventing misuse.

Legal basis of data processing: The voluntary consent of the data subject.

Scope of data processed: session identifier

Purpose of data processing: identification

Duration of data processing: 3 days from the date of website visit.

Strictly necessary cookies for Website operation

These cookies are essential for the proper functioning of the Website. Without accepting these cookies, the Company cannot guarantee the proper functioning of the Website or that the User will be able to access all requested information. Data stored by these cookies is not used for marketing, analytics, or similar purposes; it is used exclusively for the basic operation of the Website.

Legal basis of data processing: Legitimate interest of the Controller. Therefore, user consent is not required where the sole purpose of the cookies is transmission of communication over an electronic communications network, or where they are strictly necessary for the provision of an information society service explicitly requested by the user or subscriber.

Scope of data processed: Unique identifier, dates, timestamps

Purpose of data processing: Identification of users and tracking of website visitors.

Data subjects: Visitors of the website

Duration of data processing: In the case of cookies, the duration of data processing lasts until the end of the website visit session.

Contact and information requests

Data subjects may contact the Company via the Website or by sending an email to the Company's email address (Contact menu), or may request information by providing certain personal data. Prospective clients of the Company may directly contact the employee designated by the Company for communication purposes.

Data subjects: Natural persons who contact the Company and request information by providing their personal data.

Legal basis of data processing: Consent of the data subject (GDPR Article 6(1)(a)).

Scope of data processed and purpose:

- Name / identification
- Email address / contact and communication
- Date of message / identification
- Subject and content of message / responding
- Any other personal data provided by the data subject / responding

Duration of data processing: The data is processed for the time necessary to achieve the purpose, in some cases up to 5 years from the communication, or until the limitation period for potential claims, but at most until consent is withdrawn. If no contract or agreement is concluded between the Company and the data subject (or the entity represented by the data subject) after pre-contractual communication, the messages are deleted after the communication is closed, provided that no other processing purpose applies.

Administrative and record-keeping data processing

The Controller processes personal data in certain cases related to its activities, as well as for administrative and record-keeping purposes.



The legal basis for data processing is the voluntary and explicit consent of the data subject, based on appropriate prior information. The detailed information—which covers the purpose, legal basis, duration of processing, and the rights of the data subject—is provided in advance, and the Controller draws the data subject's attention to the voluntary nature of the data processing. Consent is recorded in writing.

Data processing for administrative and record-keeping purposes serves the following objectives:

- processing of data of the Company's members and employees, based on legal obligations;
- processing of data of persons under contractual mandate with the Company, for contact, accounting, and record-keeping purposes;
- processing of contact data of natural persons who are in business relationships with other organizations, institutions, and enterprises, which may include identification and contact data of natural persons;

Such data processing is partly based on legal obligations and partly on the explicit consent of the data subject (e.g., for employment contracts or registration as a partner via the website, etc.).

In the case of administrative data processing, personal data are included exclusively in the relevant case files and records. Such data are processed until the destruction (archiving/retention expiry) of the underlying document.

In order to ensure that personal data storage is limited to the necessary period, the Controller reviews such processing annually and deletes inaccurate personal data without delay.

Duration of data processing

The duration of data processing is the time necessary to achieve the purpose of processing, which in some cases corresponds to the duration of the contractual relationship, but at most until withdrawal of consent or the limitation period for potential claims. This is generally 5 years from the performance of the contract (limitation period under the Civil Code), and for accounting purposes, personal data are retained for 8 years from the preparation of the relevant annual financial statements, business report, or accounting records, in accordance with applicable accounting regulations.

Processing activities carried out by the Company as a data processor

With respect to certain Clients, the Company acts as a Data Processor and undertakes to process personal data in compliance with the GDPR, as follows:



- The data shall be processed exclusively on the basis of the Data Controller's instructions, within the defined purposes; the Company shall not modify, copy, link to other databases, or share the data with third parties.
- The Company shall not make legal declarations on behalf of the Data Controller, except where explicitly authorised.
- The Company shall ensure the security of the data (protection against unauthorised access, alteration, deletion, or destruction), and access to the data shall be granted only to employees who necessarily require it for their duties and who are bound by confidentiality obligations.
- The Company shall cooperate with the Data Controller in fulfilling data subject rights (access, erasure, rectification) within the required deadlines, in modifying, blocking, and deleting data, as well as in handling data security incidents and during audits.
- Upon termination of the service, the Company shall delete any data that is not required to be retained by law.

The Company, as Data Processor, shall be liable for damages only if it has failed to comply with the Data Controller's instructions, the provisions of this Notice, or the applicable legal regulations governing data processors. The Company's maximum liability for direct and indirect damages caused to the Data Controller or third parties shall be limited to the amount of service fees paid to the Data Processor in the year in which the damage occurred.

The Company reserves the right to engage additional subprocessors for the processing activities defined herein, by amending this Notice, which is expressly accepted by the data subjects.

Data processing related to complaint handling

The Company provides the opportunity for the Data Subject to submit complaints regarding the provided service and/or the Company's conduct, activities, or omissions, orally (in person or by telephone) or in writing (email or postal mail).

Scope of data subjects: all natural persons wishing to submit a complaint regarding the provided service and/or the Company's activities.

Purpose of data processing: to enable the submission of complaints, to identify the Data Subject and the complaint, to collect data required by law, to ensure communication, and to handle complaints.

Legal basis for processing: the Data Subject's consent and legitimate interest (Article 6(1)(f) GDPR), and compliance with a legal obligation (Article 6(1)(c) GDPR).

Categories of personal data / purpose of processing:

- name / identification
- postal address / notification
- email address / notification
- telephone number / notification
- subject of complaint / investigation of complaint
- complaint reference ID / complaint registration

Handling of verbal complaints

The Company shall immediately investigate verbal complaints and remedy them where necessary. If the Customer does not agree with the handling of the complaint, or if immediate investigation is not possible, a written record shall be prepared regarding the complaint, a copy of which shall be provided to the Customer.

The record of the complaint shall include the following:

- the Customer's name;
- the Customer's address, registered office, and, where necessary, mailing address;
- the place, time, and method of submitting the complaint;
- a detailed description of the Customer's complaint, with separate recording of each objection raised, in order to ensure that all issues contained in the complaint are fully investigated;
- a list of documents, records, and other evidence presented by the Customer;
- the signature of the person taking the minutes and the Customer (the latter is required in the case of a verbally submitted complaint made in person);
- the place and time the record was taken.

Duration of data processing:

Pursuant to Section 17/A(7) of Act CLV of 1997 on Consumer Protection, the Company shall retain the complaint record and a copy of the response for five (5) years.

Use of electronic surveillance system (CCTV)

The Company operates a CCTV system at its headquarters in order to ensure property security and accident prevention.

Legal framework for operating the CCTV system:



- Act CXXXIII of 2005 on Private Security Services and Private Investigation (hereinafter: Private Security Act),
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter: Infotv.),
- GDPR.

The legal basis for data processing is the data subject's voluntary consent, based on the information provided via posted notices and the CCTV policy available at reception (Article 6(1)(a) GDPR). Consent may also be given by implied conduct. In particular, it shall be considered implied consent if the data subject enters or remains in areas covered by the CCTV system.

The rules governing the operation of the CCTV system are set out in a separate notice and CCTV policy, which is available at the Company's headquarters and retail locations.

Automated decision-making and profiling:

No such processing takes place.

Data processing related to job applications (data subjects applying for employment)

With regard to job applications submitted to the Company, the Company provides information on such data processing activities in its Privacy Notice relating to job applications. In order to establish contact, it is necessary to become familiar with and accept the provisions of that notice.

5. Persons authorised to access the data

Only those employees of the Company shall be entitled to access the data whose job responsibilities require such access. Persons who have access to personal data at the Company are bound by confidentiality obligations with respect to the personal data of data subjects. Accordingly, they are required to treat as confidential all personal data and other information obtained in the course of their employment or otherwise, and to ensure that such data is not made accessible to third parties.

6. Data security

The Company enforces data security requirements throughout the entire data processing lifecycle, with the aim of minimising the processing of personal data and reducing risks.



To this end, it applies technical and organisational measures in line with the state of the art, which ensure:

- protection of data against unauthorised access, alteration, transmission, deletion, destruction, or loss of availability;
- physical and password protection of both paper-based and electronic data;
- exclusive access to data by authorised persons only;
- regular data backups;
- availability, authenticity, integrity, and confidentiality of data.

The Company ensures the development of its employees' data security awareness and provides the required level of protection when exercising data subject rights (information, rectification, erasure, objection).

Backup

The Company performs daily backups of electronically stored data. The storage of backups is ensured on the Data Controller's own server.

Legal basis for backup-related data processing:

The Company's legitimate interest (Article 6(1)(f) GDPR) in complying with GDPR requirements and ensuring the continuous and uninterrupted availability of data generated during its operations. The Company processes a significant amount of data, the secure storage and potential recovery of which in case of damage is of significant public interest.

Purpose of data processing:

To enhance data security, to preserve documents related to the Data Controller's operations, to enable recovery in the event of a data security incident, and to ensure the continuity of business processes.

7. Storage of personal data, data processing

Personal data is stored at the Company's registered office, both in paper form and electronically on the Company's servers.

8. Data processing, data transfer

In order to achieve the data processing purposes set out in this Notice, to comply with legal obligations, and to perform its tasks, the Company may engage the services of third parties, which may also involve the processing of personal data of data subjects.



Such third party (hereinafter: “Data Processor”) shall carry out data processing in accordance with the Company’s instructions and in compliance with applicable legal requirements. For the purposes of data processing, only the personal data necessary for the specific purpose shall be transferred to each Data Processor. The Company does not use Data Processors.

9. Management of personal data breaches

The Company takes all necessary measures to prevent personal data breaches. A personal data breach is a security incident resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to personal data that is transmitted, stored, or otherwise processed.

The Data Controller shall notify the National Authority for Data Protection and Freedom of Information (Hungary) without undue delay of any personal data breach, except where the breach is unlikely to result in a risk to the rights and freedoms of data subjects.

The Data Controller keeps a record of personal data breaches, together with the measures taken in relation to each incident.

If the breach is serious (i.e. likely to result in a high risk to the rights and freedoms of the data subject), the Data Controller shall inform the data subject of the personal data breach without undue delay.

10. Rights of the Data Subject in relation to data processing

The Company draws the attention of Data Subjects to the fact that in the event of a complaint or comment, it is advisable in the first instance to contact the Company, as Data Controller, using one of the contact details provided in this Notice.

Rights of the Data Subject:

Right to information / access:

The Data Subject has the right to receive confirmation as to whether their personal data is being processed and, if so, to access all relevant information regarding the processing (including the purposes, categories of data, recipients, storage period, rights, and source of the data). Upon request, a copy of the personal data shall be provided. For additional copies requested by the Data Subject, the Company may charge a reasonable fee based on administrative costs.

**Right to rectification:**

The Data Subject may request the rectification of inaccurate personal data without undue delay and the completion of incomplete personal data.

Right to erasure:

The Data Subject may request the deletion of their personal data where the purpose of processing has ceased, consent has been withdrawn and there is no other legal basis, or where the data processing is unlawful.

Right to restriction of processing:

The Data Subject may request the restriction of processing if they contest the accuracy of the data, if the processing is unlawful but they request restriction instead of erasure, if the data is required for legal claims, or if they have objected to the processing. In the case of restriction, the data may only be processed in exceptional cases.

Right to data portability:

The Data Subject has the right to receive their data in a structured, commonly used, machine-readable format and to transmit it to another data controller, provided that the processing is based on consent and carried out by automated means. Where technically feasible, direct transfer between data controllers may also be requested.

Right to object:

The Data Subject may object at any time to the processing of their personal data based on legitimate interest; following such objection, the Company may only continue processing the data on compelling legitimate grounds. The Data Subject also has the right not to be subject to a decision based solely on automated processing, except where necessary for the performance of a contract, authorised by law, or based on explicit consent.

Right to withdraw consent:

Consent may be withdrawn at any time by the Data Subject without consequences. In the event of withdrawal, data processing shall cease and the data shall be deleted, provided that there is no other legal basis for processing. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

The Company shall provide the Data Subject with a copy of the personal data undergoing processing. For additional copies requested by the Data Subject, the Company may charge a reasonable fee based on administrative costs.

11. Procedure in case of a Data Subject's request

The Data Subject may submit any request described above, or any other question or inquiry relating to their personal data, to the Company's representative via any of the contact details indicated in this Notice.

The Company shall decide on written requests within 30 days of receipt. Where necessary, taking into account the complexity of the request and the number of pending requests, the Company may extend this deadline. The Data Subject shall be informed in advance of any extension and the reasons for it.

If the Data Subject's request is well-founded, the Company shall implement the requested measure within the applicable deadline and provide written confirmation of its execution. If the Company rejects the Data Subject's request, it shall issue a written decision. The decision shall set out the factual basis, the reasoning for the decision with reference to the relevant legislation and case law, and shall inform the Data Subject of available legal remedies.

If the Data Subject does not agree with the Company's decision, or if the Company fails to comply with the above procedural deadlines, the Data Subject may обратиться to the supervisory authority or to a court.

12. Supervisory authority

If the Data Subject considers that the processing of their personal data by the Company infringes applicable data protection laws, in particular the provisions of the GDPR, they have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (Hungary).

Contact details of the National Authority for Data Protection and Freedom of Information:

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

Address: 1055 Budapest, Falk Miksa utca 9–11.

Postal address: 1363 Budapest, Pf. 9.

Telephone: +36-1-391-1400

Fax: +36-1-391-1410

Email: ugyfelszolgalat@naih.hu



The Data Subject also has the right to lodge a complaint with a supervisory authority in another EU Member State, in particular in the Member State of their habitual residence, place of work, or the place of the alleged infringement.

13. Right to bring legal proceedings (right to go to court)

The Data Subject may, irrespective of the right to lodge a complaint, bring legal proceedings before a court if their rights under the GDPR have been infringed during the processing of their personal data. An action against the Company, as a Hungarian Data Controller, may be brought before a Hungarian court.

If the Data Subject wishes to initiate legal proceedings against a Data Processor, the action must be brought before the court of the Member State where the Data Processor is established.

The Data Subject may bring the action before the court having jurisdiction over their place of residence or habitual residence. In Hungary, information on the competent courts is available at: <http://birosag.hu/torvenyszekek>.

If the Data Subject's habitual residence is in another Member State of the European Union, the action may also be brought before the competent court of that Member State.

14. Other provisions

The Company reserves the right to unilaterally amend this Notice at any time.

This Notice remains in force until further notice or until withdrawn.

Appendices:

- Annex 1 – List of Data Processors and data transfers

Dated: Budapest, 3 July 2026

INRIMAS Ltd. / Data Controller