

Data Protection Notice

PannErgy Public Limited Company (registered office: 1112 Budapest, Boldizsár utca 2; company registration number: 01-10-041618; tax number: 10558377-2-43; hereinafter: **'Data Controller'**) hereby provides the following information, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (**"General Data Protection Regulation"**), the Data Controller hereby provides the following information to shareholders and those entitled to dividend payments (**"Data Subjects"**) regarding the processing of their personal data.

1. Name and contact details of the Data Controller:

PannErgy Public Limited Company (registered office: 1112 Budapest, Boldizsár utca 2; company registration number: 01-10-041618; tax number: 10558377-2-43)

Email: info@pannergy.com

Website: <https://pannergy.com/>

3. Scope of personal data processed, legal basis for data processing, purpose and duration of data processing:

Scope of personal data processed	Legal basis for data processing	Purpose of data processing	Duration of data processing
• Full name; • Birth name; • Place and date of birth; • Mother's maiden name; • Address; • Tax identification number; • Bank account number; • Number of shares. In the case of a data subject residing abroad, the following information is also required: • Passport number; • Nationality; • ISO country code	Pursuant to Article 6(1)(c) of the GDPR. Act V of 2013 on the Civil Code Act CXX of 2001 on the Capital Market Act CXVII of 1995 on personal income tax Act C of 2000 on Accounting	Calculation of dividends on shares issued by the data controller, determination of taxes and public levies to be deducted, processing of dividend payments (transfers), keeping the share register up to date, as well as issuing the tax certificates required by law and fulfilling tax return obligations.	The documents serving as the basis for the payment and the data relating to the reconciliation of ownership must be retained for 8 (eight) years following the year of payment, in accordance with Section 169(2) of Act C of 2000 on Accounting.

The Data Controller processes personal data (i) indirectly, during the shareholder verification process initiated by the Data Controller, via the securities account manager of the Data Subject, by KELER Central Securities Depository Ltd. (registered office: 1074 Budapest, Rákóczi út 70-72; company registration number: 01-10-042346; tax number: 10873151-2-44) and (ii) directly from the Data Subjects, by means of a private document of full probative value containing the data necessary for the payment of the Data Subject's dividend.

4. Automated decision-making (including profiling):

No automated decision-making, including profiling, takes place during data processing.

5. Transfer of personal data, recipients of personal data and categories of recipients:

The Data Controller engages the following data processors in connection with data processing:

- **WTS Klient Gazdasági Tanácsadó Kft. (registered office: 1143 Budapest, Stefánia út 101–103;** activities relating to data processing: calculation of dividends, preparation of tax returns and data reports for the National Tax and Customs Administration (NAV); email: info+dpo@wtsklient.hu.

Personal data will be transferred to the following recipients:

Personal data may only be transferred to third parties on the basis of statutory authorisation or with the prior consent of the Data Subject.

In view of the Data Controller's legal obligations, data is provided to the National Tax and Customs Administration.

Prior to any data transfer, the Data Controller is obliged to verify that the statutory conditions for such transfer are met, and, following the transfer, that the conditions for data processing are fulfilled in respect of each item of personal data.

Prior to any data transfer to the same data controllers concerning the same Data Subject and for the same purpose, the data protection officer must also be involved in assessing the lawfulness of the data transfer. No separate assessment is required for subsequent data transfers.

Transfers abroad or to a third country

Prior to the transfer of data – with the involvement of the Data Protection Officer – the Data Controller is obliged to assess whether the statutory conditions for such a transfer are met and whether, following the transfer, the conditions for data processing are fulfilled in respect of each item of personal data concerned by the transfer.

The Data Controller hereby states, pursuant to Article 13(1)(f) of the GDPR, that, as at the date of entry into force of this notice, it does not transfer any data processed by it to an international organisation.

The Data Controller hereby states, pursuant to Article 13(1)(f) of the GDPR, that, as at the date of entry into force of this notice, it does not transfer personal data to a third country, except where such transfer is carried out by the Data Controller for the purpose of providing healthcare education services in another country.

6. The Data Subject's rights in relation to data processing:

The Data Subject may request from the Data Controller:

- a) access to their personal data,
- b) the rectification of their personal data, and
- c) the erasure of their personal data or the restriction of its processing, except where processing is required by law.

Right of access:

The Data Subject is entitled to receive confirmation from the Data Controller as to whether their personal data is being processed, and if such processing is taking place, they are entitled to access that personal data. The Data Controller shall provide the Data Subject with a copy of the personal data being processed. For any further copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. If the Data Subject has submitted the request electronically, the information must be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

Right to rectification:

The Data Subject has the right to have inaccurate personal data concerning them rectified by the Data Controller without undue delay upon request.

Right to erasure:

The Data Subject has the right to have the Data Controller erase personal data relating to them without undue delay upon request, and the Data Controller is obliged to erase personal data relating to the Data Subject without undue delay if any of the following grounds apply:

- (a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws their consent on which the processing is based, pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation, and there is no other legal basis for the processing;
- c) the Data Subject objects to the processing pursuant to Article 21(1) of the General Data Protection Regulation and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing pursuant to Article 21(2) of the General Data Protection Regulation;
- 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 Data Controller is subject;
- f) the personal data were collected in connection with the offering of information society services referred to in Article 8(1) of the General Data Protection Regulation (conditions relating to the consent of a child).

Right to restriction of processing:

The Data Subject has the right to request that the Data Controller restrict data processing if any of the following conditions are met:

- a) the Data Subject contests the accuracy of the personal data; in this case, the restriction shall apply for a period enabling the Data 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 its use be restricted;
- c) the Data Controller no longer needs the personal data for the purposes of data processing, but the Data Subject requires it for the establishment, exercise or defence of legal claims; or
- d) the Data Subject has objected to the processing in accordance with Article 21(1) of the General Data Protection Regulation; in this case, the restriction shall apply for as long as it has not been established whether the Data Controller's legitimate grounds override those of the Data Subject.

Where processing is restricted, such personal data may, apart from storage, be processed only with the Data Subject's consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

Right to data portability:

The Data Subject is also entitled to receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format, and to transmit those data to another data controller without hindrance from the Data Controller to whom the personal data were provided, where: (i) the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation, or on a contract pursuant to Article 6(1)(b) of the General Data Protection Regulation; and (ii) the processing is carried out by automated means.

Right to object:

The Data Subject has the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data based on Article 6(1)(e) or (f), including profiling based on those provisions. In such a case, the Data Controller may no longer process the personal data, unless the Data Controller demonstrates that there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or which relate to the establishment, exercise or defence of legal claims.

Where personal data are processed for the purposes of direct marketing, 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, insofar as it is related to direct marketing. If the Data Subject objects to the processing of personal data for the purposes of direct marketing, the personal data may no longer be processed for that purpose.

General rules on the exercise of the Data Subject's rights:

The Data Controller shall inform the Data Subject of the measures taken in response to their request without undue delay, but no later than one month from receipt of the request. Where necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Data Controller shall inform the Data Subject of any extension of the time limit within one month of receiving the request, stating the reasons for the delay. If the Data Subject submitted the request electronically, the information shall be provided electronically where possible, unless the Data Subject requests otherwise.

The Data Controller shall provide the information and take the necessary action free of charge. If the Data Subject's request is manifestly unfounded or – in particular due to its repetitive nature – excessive, the Data Controller, having regard to the administrative costs involved in providing the requested information or taking the requested action, shall:

- (a) may charge a reasonable fee, or
- b) refuse to act on the request.

The burden of proving that the request is manifestly unfounded or excessive lies with the Data Controller.

If the Data Controller has reasonable doubts as to the identity of the natural person submitting the request, it may request further information necessary to verify the Data Subject's identity.

8. Remedies:

In the event of a breach of their rights, the Data Subject may bring a claim against the Data Controller in court. The court shall hear the case as a matter of priority. The Data Controller is obliged to prove that the data processing complies with the provisions of the law. The case falls within the jurisdiction of the regional court; in the capital, this is the Budapest Regional Court. The case may also be brought before the regional court corresponding to the Data Subject's place of residence or habitual residence.

The Data Controller is obliged to compensate any other party for damage caused by the unlawful processing of the Data Subject's data or by a breach of data security requirements. The Data Controller shall be exempt from liability if it proves that the damage was caused by an unavoidable cause outside the scope of data processing. No compensation shall be payable to the extent that the damage resulted from the intentional or grossly negligent conduct of the injured party.

In the event of a complaint regarding the processing of their personal data, the Data Subject may also lodge a complaint with the National Authority for Data Protection and Freedom of Information (Dr Attila Péterfalvi, Chair of the National Authority for Data Protection and Freedom of Information; postal address: 1363 Budapest, P.O. Box 9; address: 1055 Budapest, Falk Miksa utca 9–11.; Telephone: +36 (1) 391-1400; Fax: +36 (1) 391-1410; Email: ugyfelszolgalat@naih.hu ; website: www.naih.hu).