



Information about GDPR compliance of WABERER'S INTERNATIONAL Nyrt.

1. Measures taken for compliance

- We are committed to protecting the privacy and personal data of our partners and therefore we operate, at all times, in compliance with the provisions of the EU General Data Protection Regulation ("GDPR") and other relevant local and international privacy laws. Acting as data controller and data processor, we have prepared adequate privacy policies and privacy statements, we have implemented processes to manage any possible privacy breach, and we keep all records and documents related to data processing as required under the GDPR.
- We have taken all necessary steps and measures to ensure that all employees, subsidiaries and subcontractors (hereinafter referred to together as "Employees") that have any access to personal data or participate in data processing perform their job in accordance with relevant privacy laws and regulations. We confirm that any personal data controlled and/or processed by the Company can be accessed only by Employees who (i) need that data for the performance of their job-related tasks, and (ii) are contractually bound by confidentiality and privacy obligations. The Company shall be fully liable and responsible for any actions by Employees.
- We have provided training, with the participation of third party experts, to our Employees on GDPR, e.g. tasks and responsibilities related to data processing. Through regular training and continuous development we ensure that handling and processing of any personal information is in compliance with relevant laws and regulations.

2. Our company as data processor

- For all contracts and agreements under which personal information is collected or processed, we execute a data processing agreement with the other party (e.g. client, partner, customer) (hereinafter referred to together as: "Client").
- Pursuant to the provisions of the GDPR and relevant local data protection laws, we shall use third party data processors only with the prior consent of Client, and we shall inform Client about the identity and activities of the third party data processor and any other significant circumstances related to data processing. We require third-party data processors to provide the same level of data protection that we provide to our Clients. Our Company shall be fully liable for any acts, e.g. data breaches committed, by third party data processors.
- We do not transfer personal information to a third country without the prior consent of Client, and any such transfer shall be subject to the data processor proving adequate levels of data protection as set out in the relevant sections of the GDPR.
- When acting as data processor, we shall always proceed as instructed by Client and shall use personal information only for the original purposes it was collected for.
- Personal information of data subjects shall be processed only for the purposes specified by Client. We always inform data subjects via Privacy Statements. Personal information is stored as required by privacy laws. Erasure of personal information shall

always be in accordance with instructions received from Client and relevant privacy laws and regulations. Pursuant to the data processing agreement executed between Client and our Company, we undertake to take appropriate technical and organizational measures to enable Client to respond to Data Subject Right (DSR) requests in accordance with the provisions of GDPR.

- Should we receive any Data Subject Right request or inquiry from data subjects related to the processing of their personal information, we shall forward any such requests as soon as possible, and with as much detail as possible, to Client.
- Erasure of personal information shall always be done as specified in the agreement executed with Client and in accordance with instructions received from Client. Data to be erased shall be permanently and securely deleted from all databases and/or destroyed.
- Our company has implemented Privacy Impact Assessment (PIA) procedures and impact assessment plans. Where an impact assessment is needed, we shall proceed in cooperation with Client.
- Our company has implemented information security and IT policies that adequately establish the rules and tasks for the basis of secure storage of personal information. In terms of privacy and data security, we take every measure to ensure the confidentiality and security of personal information. We ensure the protection of personal data processed and stored by us, and take the required technical and organizational measures to guarantee that personal data is processed in a manner that ensures appropriate security thereof, including protection against unauthorized or unlawful access, processing, accidental loss, disclosure, destruction or damage.
- We have an incident management procedure and incident management policy in place. We shall promptly notify Client about any detected privacy breach and take all necessary and/or recommended corrective measures and fully cooperate to assist Client in all its reasonable and lawful efforts to prevent, avoid, or remedy privacy breaches. We shall keep an up-to-date record of all data breaches.

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