

GENERAL DATA PROCESSING INFORMATION AND POLICY

Valid from: 27/11/2025

1. The data controller (Company)

Company name: MiniRaktar.com Kft.

Registered office: 1115 Budapest, Thallóczy Lajos u. 27.

Company registration number: 01-09-676497

Website address: www.miniraktar.com

Telephone customer service: +36-1-279-3000 (Business days 9:00-17:00)

Customer service email address: judit@miniraktar.com

Complaints handling location and customer service office: 1135 Budapest, Jász. u. 45.

The contact details for complaint handling are the same as the customer service contact details.

Hosting provider name: Storganise

Hosting provider address: Unit 1503-06, 15/F, Tower 1, Ever Gain Plaza, 88 Container Port Road, Kwai Chung NT, Hong Kong SAR

The data processor's privacy policy can be found at this link:

<https://www.dropbox.com/scl/fi/jgnzibh9zumf1whsxi7pi/Storeganise-Data-Processing-Addendum.pdf?rlkey=lx103qgnumk155dqate140p6&e=1&st=4wy9fi33&dl=0>

Hosting provider name: Tárhely.Eu Szolgáltató Korlátolt Felelősségű Társaság

Hosting provider address: 1144 Budapest, Ormánság utca 4. X. em. 241. ajtó

2. Data protection guidelines applied by the Company

- Regulation 2016/679 of the European Parliament and of the Council (GDPR);
- Act CXII of 2011 on the right to information self-determination and freedom of information (hereinafter: “Infotv.”);
- Act C of 2000 on accounting, Section 169 (regarding the preservation of receipts)
- Government Decree 297/2001. (XII. 27.) on currency exchange activities

3. Definitions

1. “*personal data*” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

2. “*processing*” means any operation or set of operations which is 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, deletion or destruction;

3. ‘*controller*’ means the natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the

controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law;

4. *'processor'* means the natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

5. *'recipient'* means the natural or legal person, public authority, agency or any other body to which personal data are disclosed, whether or not a third party. Public authorities which have access to personal data in the context of an individual investigation in accordance with Union or Member State law shall not be considered recipients; the processing of such data by these public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;

6. *"consent of the data subject"* means any freely given, specific, adequately informed and unambiguous indication of the data subject's wishes by which the data subject, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

7. *"data breach"* means any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

4. Purpose, legal basis and method of data processing

The purpose of data processing is to ensure the provision of services available under the URL www.miniraktar.com. The scope of personal data to be provided in order to use these services can be found in the description of the relevant services.

When using the service, you provide data subject to the protection of personal data (name, address, telephone number, email address, possibly billing address and tax number), which we use only for the performance of the above contract. In this case the legal basis for data processing is Article 6(1)(a) of the GDPR and Section 5(1)(b-c) of the Infotv. based on your consent and the need to perform the contract concluded between us, or (since we have an invoicing obligation) the need to comply with the legal obligation applicable to us.

We are obliged to retain the data provided during the use of the service for 10 years according to legal requirements.

The data controller does not check the personal data provided to it. The person providing it is solely responsible for the adequacy of the data provided. When providing an email address, any user assumes responsibility for using the service exclusively from the email address provided. In view of this assumption of responsibility, any liability related to logins made from a given email address lies solely with the user who registered the email address.

5. Principles for the processing of personal data:

Personal data

- must be processed lawfully and fairly and in a manner that is transparent to the data subject (lawfulness, fairness and transparency);
- must be collected only for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes; further processing for archiving

- purposes in the public interest, scientific and historical research purposes or statistical purposes shall not be considered incompatible with the original purpose (purpose limitation);
- must be adequate and relevant in relation to the purposes for which the data are processed and limited to what is necessary (data economy);
 - must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes of the processing, are erased or rectified without delay (accuracy);
 - stored in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for a longer period only if the personal data are processed for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects as provided for in this Regulation (storage limitation);
 - processed in such a way that appropriate technical or organisational measures ensure the security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage (integrity and confidentiality).

The controller is responsible for compliance with the above and must be able to demonstrate such compliance (accountability).

6. Data of the data processors used by the Company:

- Operates an email system: Tárhely.Eu Szolgáltató Korlátolt Felelősségű Társaság, 1144 Budapest, Ormánság utca 4. X. em. 241.;
- Provides server space services: Storganise, Unit 1503-06, 15/F, Tower 1, Ever Gain Plaza, 88 Container Port Road, Kwai Chung NT, Hong Kong SAR;
- Provides software and data management: Storganise, Unit 1503-06, 15/F, Tower 1, Ever Gain Plaza, 88 Container Port Road, Kwai Chung NT, Hong Kong SAR;
- Provides access control system: sedisto GmbH, Hauptstr. 9 38173 Dettum Germany;
- Provides invoicing: számlázz.hu, üzemeltető: KBOSS.hu Kft., adószám: 13421739-2-13, cégjegyzékszám: 13-09-101824, székhely: 2000 Szentendre, Táltos u. 22/b.
- Provides electronic signature: Microsec zrt., 1033 Budapest, Ángel Sanz Briz út 13.

7. Possibility of data transfer

The Company, as a data controller, is entitled and obliged to transfer all personal data at its disposal and regularly stored by it to the competent authorities, which it is obliged to transfer by law or a legally binding official obligation.

The data controller cannot be held liable for the transfer of such data and the consequences arising therefrom.

If the Company transfers the operation or utilization of the content service on the www.miniraktar.com website in part or in whole to a third party, it may transfer the data it processes in full to this third party for further processing without requesting separate consent. This data transfer may only serve the continuous registration of users who have already signed a contract, but it may not place the user in a more disadvantageous position than the data management and data security rules specified in the current text of this data management policy.

8. Modification of the Data Management Policy

The Company reserves the right to modify this Data Management Policy at any time by its unilateral decision.

After the modification of the Data Management Policy, all users shall be informed in an appropriate manner.

By continuing to use the service, users acknowledge the changed data management rules, and there is no need to request their consent beyond this.

9. Users' rights regarding their personal data processed by the data controller

Users may request information from the Company, as the data controller, about the processing of their personal data at any time in writing, by registered or registered letter with return receipt sent to the data controller's address (1115 Budapest, Thallóczy Lajos u. 27.), or by e-mail sent to judit@miniraktar.com. The data controller will only consider a request for information sent by e-mail as authentic if it is sent from the user's registered e-mail address. The request for information may cover the user's data processed by the data controller, the purpose, legal basis, duration of the data processing, the name and address of any data processors, the activities related to the data processing, and who has received or will receive the user's data and for what purpose.

10. Complaint handling

If you experience that any of your rights have been violated, please contact us, we will do everything in our power to investigate the case and compensate for the inconvenience. You can also exercise your right to file a complaint with the National Data Protection and Freedom of Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság):

National Data Protection and Freedom of Information Authority
1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Mailing address: 1530 Budapest, P.O. Box: 5.
Telephone: +36 -1-391-1400
Fax: +36-1-391-1410
E-mail: ugyfelszolgalat@naih.hu

11. Camera system

The Company operates camera system capable of image recording in the rental building (hereinafter referred to as the "Rental Building") located at the property registered in the Land Registry under lot number 27195, Budapest XIII, found in nature at 1135 Budapest, Jász. u. 45, and at the entrances to the Rental Building. The purpose of the camera system is to protect the stored goods in the Rental Building and in certain leased premises, the equipment provided by the Company, and the physical integrity of those present there, as well as to monitor logistics processes, settle legal disputes, investigate damage incidents, and detect criminal offenses.

The cameras operated by the Company in the Rental Building record the entrances, parking area, common areas, and corridors. The public area is masked in the recordings of cameras that also cover public areas.

These recordings may be accessed by persons who, due to their duties, need to do so in order to fulfil their obligations.

The recorded footage may be reviewed at the request of a court, authority, or person who can prove their right or legitimate interest, unless this would result in disproportionate harm to another person, or in the event of a presumed violation of the purpose of the camera system. In addition to the person concerned by the recording, only those persons who are otherwise entitled to access the content of the recordings in accordance with the above rules are entitled to review the recordings.

The legal basis for data processing is, on the one hand, the voluntary consent of the customer in accordance with Article 6(1)(a) and (f) of the GDPR and Section 5(1)(b)-(c) of the Infotv., and, on the other hand, the protection of property, life, and physical integrity.

Scope of data processed: images of employees and customers/tenants.

The recorded footage will be deleted within 30 days, given that there is no continuous personnel monitoring in the Rental Building, so the above-mentioned objectives cannot be achieved in any other way, and the shortest term of rental is 28 days, during which time it is not possible to guarantee the detection of individual cases or incidents that violate the law.

12. Access control system

The Company uses an access control system in the Rental Building. The purpose of the access control system is to ensure that only those who work at the site as employees, agents or who have rented storage unit as tenants of the Company are allowed to enter the Rental Building.

The application that generates unique access codes generates a unique access code for each employee, agent and tenant to enter the main entrance and corridor doors of the Rental Building.

The data recorded by the access control system is processed exclusively by the security office as the data controller. The data may be accessed by the managing director and those employees or agents of the Company who need it to perform their duties.

The legal basis for data processing is Article 6(1)(a) and (f) of the GDPR and Section 5(1)(b-c) of the Infotv., to which the employee and tenant consent by downloading the application, receiving the code, and using it.

No data is stored for employees and agents.

Data stored for tenants:

- tenant's email address
- number of rented storage unit
- duration of active rental agreement.

Regarding access logs, Sedisto records when a tenant opens a door or a storage unit. We only keep these access logs for a limited time. The data recorded by the access control system and the data generated during its operation shall be destroyed upon termination of access rights, but no later than 6 months after the data was generated.

13. Examination of necessity and proportionality in relation to the camera and access control system

Necessity: The self-service Rental Building provides continuous access every day of the year, so that there is no continuous personal control in its area. The lack of cameras would pose a significant risk to the safety of life and property. The detection of violations, the apprehension of the perpetrator, and the prevention of illegal acts are not otherwise possible, and their proof cannot be achieved by any other method.

Proportionality: The Company's legitimate interest in the protection of life and property does not disproportionately infringe the restriction of the Tenants' personal rights in the common areas. The cameras only monitor the common areas. The Company only reviews the recorded recordings in justified cases.

Less restrictive means: In addition to physical closure, the camera is the most effective deterrent and evidence.

14. Cookies Management

We use cookies (hereinafter referred to as “cookies”) on our website. These are files that store information in your web browser. Your consent is required for this. We use cookies in accordance with Act C of 2003 on electronic communications, Act CVIII of 2001 on electronic commerce services, certain issues related to information society services, and the regulations of the European Union.

Websites operating within the countries of the European Union must request the consent of users to use cookies and to store them on the user’s computer or other device. The consent is given on the website via a pop-up window.

Here is some more technical information about cookie management so you know what is happening in the background:

a) Necessary cookies, cookies essential for the functioning of the website

Necessary cookies ensure the proper functioning of the website and collect information about the use of the website without identifying our visitors. They help make our website usable by enabling basic functions such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

b) Analytical cookies

By collecting and reporting data in an anonymous form, analytical cookies help us understand how visitors interact with the website. These cookies help provide information on metrics such as visitor numbers, bounce rates, traffic sources, etc.