PRIVACY POLICY
IN RELATION TO SHAREHOLDERS

OF GRAPHISOFT PARK SE INGATLANFEJLESZTŐ
EURÓPAI RÉSZVÉNYTÁRSASÁG

The purpose of this privacy policy is to inform the shareholders about the processing of data in relation to the exercise of shareholder rights.

date of entry into force: 1 October, 2021

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V. DATA PROCESSORS

I. GENERAL PROVISIONS

1.1. Processing of data

1.1.1. **Graphisoft Park SE Ingatlanfejlesztő Európai Részvénytársaság** (registered seat: 1031 Budapest, Záhony utca 7., Cg. 01-20-000002, email address: info@graphisoftpark.com, website: www.graphisoftpark.hu, hereinafter referred to as: **Company** or **Controller**) is the owner of "Graphisoft Park - Irodapark" located at 1031 Budapest, Záhony utca 7. through its subsidiaries.

1.1.2. The share capital of the Company consists of 10,631,674 ordinary shares of series A with a nominal value of 0.02 Euro each and 1,876,167 employee shares of series B with a nominal value of 0.02 Euro each. Where reference is made in this Policy to ordinary shares or employee shares, this shall be understood to refer only to ordinary shares or employee shares, and where reference is made to shares, this shall be understood to refer to shares of both series together. The ordinary shares are listed on the Budapest Stock Exchange.

1.1.3. The shareholder is the owner of the share. The share represents various membership rights which the shareholder is entitled to exercise against the Company. During exercising the shareholder rights, the Company carries out various data processing exercises.

1.2. Policy

1.2.1. The purpose of this Privacy Policy (hereinafter referred to as: **Policy**) is to provide information about the Company's data processing practices in relation to shareholders.

1.2.2. The currently valid version of the Policy is available at all time on the www.graphisoftpark.hu website and at the registered seat of the Company in paper form.

1.2.3. The Company is entitled to amend the Policy unilaterally at any time, as necessary, without prior notice, with effect from the date of amendment. The Company shall inform the Subjects of the fact of the amendment via contact details specified in Section 1.2.2.

1.3. Applicable law

Processing of data is governed by the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: **GDPR**).

1.4. The Subject

The Subject is the shareholder, in case of jointly owned shares also the joint representative, or in case of a proxy also the representative.

II. INDIVIDUAL DATA PROCESSING EXERCISES

Details of some of the data processing relating to shareholders are set out in the following tables.

2.1. Data processing in relation to the maintenance of the register of shareholders

Data processing operations:	Pursuant to Section 3:245 (1) of the Civil Code, the Company shall keep a register of shareholders, including holders of interim shares, in which it records the name and the home address of shareholders, in case of jointly owned shares, the name and home address of the joint representative, the number of shares or interim shares, and the ownership percentage for each series of shares. The Company's register of shareholders is kept by KELER Központi Értéktár Zártkörűen Működő Részvénytársaság (registered seat: 1074 Budapest Rákóczi út 70-72., Cg. 01-10-042346, tax number: 10873151-2-44) on behalf of the Company.

Scope of personal data subject to processing:	1. name 2. home address 3. number of shares or interim shares per series of shares 4. ownership percentage and total nominal value of shares
Purpose of data processing:	Data processing is necessary for the purposes of maintaining the register of shareholders.
Legal basis of data processing:	The data processing is based on **Article 6 (1) c) of the GDPR**, i.e. the data processing is necessary for the performance of a legal obligation, the legal obligation is defined in the Civil Code. §§ 3:245-3:248.
Duration of data processing:	For as long as the shareholder holds a share in the Company, the Company will process the shareholder's personal data in accordance with this clause. As soon as the shareholder no longer holds a share in the Company, the Company shall delete the shareholder's personal data from the register of shareholders in accordance with the procedures of KELER Központi Értéktár Zártkörűen Működő Részvénytársaság and the securities account managers. However, according to Section of the Civil Code 3:246 (4), the deleted data must remain ascertainable from the register of shareholders, so that the shareholder's personal data cannot be permanently deleted until the limitation period from the date of the dissolution of the Company without legal succession has expired. In accordance with Section 6:22 of the Civil Code, the statute of limitation shall, as a general rule, be 5 years.
Rights of the Subject:	According to Section 3:247 (1) of the Civil Code, the general public shall have unlimited access to the register of shareholders. Access is available at the registered office of KELER Központi Értéktár Zártkörűen Működő Részvénytársaság during working hours. Any person in respect of whom the register of shareholders contains outstanding or deleted data may request a copy of the relevant part of the register of shareholders from KELER Központi Értéktár Zártkörűen Működő Részvénytársaság, which shall be issued within 5 days. The shareholder shall also be entitled to the rights set out in Chapter III of this Policy, with the exception that the Subject shall not have the right to data portability, erasure, and objection with regard to the performance of the legal obligation as a legal basis.
Exercising of rights of the Subject:	According to Chapter IV of this Privacy.

2.2. Data processing in relation to the exercise of shareholders' rights

Data processing operations:	According to Section 3:268 (1) of the Civil Code the supreme body of the Company is the general meeting. Pursuant to Section 3:274 (1) of the Civil Code, the Company shall draw up an **attendance list** of the shareholders present at the general meeting, indicating the name, home address of the shareholder or his/her representative, number of shares and number of votes to which the shareholder is entitled, and the signature of the shareholder who signed the attendance list. Pursuant to Section 3:278 (1) of the Civil Code, the Company shall draw up **minutes** of the general meeting, which shall include, among other things, the names of the chairman of the general meeting, the minute taker, the verifier and the vote counter, as well as the main events that took place at the general meeting and the motions that were put forward. If the chairman of the general meeting, the minute taker, the verifier or the vote counter are shareholders, the name of the shareholder and his/her signature, except for vote counters, shall be entered in the minutes, as well as the motions and

	proposals made at the general meeting, which shall also be the personal data of the shareholder. Pursuant to Section 3:272 (4) of the Civil Code, the Company shall send the materials of the general meeting to be published to the shareholder who so requests, at the same time as the materials of the general meeting are published, **by electronic means**. In the event of such a shareholder request, the Company shall also record the shareholder's e-mail address through which it will comply with the request. Any shareholder intends to participate on the general meeting in person shall verify his/her identity (or, in case of a proxy, the representation rights of a proxy) before the general meeting by presenting to the Company the documents and papers suitable for establishing his/her identity and right of representation in accordance with the laws in force at the time (hereinafter referred to as "registration"). The Company shall compare the name and home address of the shareholder as entered in the register of shareholders with the data contained in the documents and papers presented and the shareholder's image with the image on the documents and papers. Only verification is made during the comparison, the Company will not record any further data from the documents and papers presented, nor make any copies of them, except for the proxy and the authentic company signature (currently: specimen signature or sample signature), so that the data on the documents and papers will only be accessible to the Company and only for the period during which the Company carries out the verification. Pursuant to Act No. 78 of 2017, the Company's legal representative may, to verify the conformity of the shareholder's data with the data recorded and the validity of the documents presented by the shareholder, request data electronically from the Register of Personal Data and Addresses, the Register of Driving Licences, the Register of Travel Documents and the Central Register of Aliens, which he/she is obliged to keep.
Scope of personal data subject to processing:	1. name (to be indicated in the register of shareholders) 2. home address (to be indicated in the register of shareholders) 3. number of shares (to be indicated in the register of shareholders) 4. number of votes (to be indicated in the register of shareholders) 5. signature (on the attendance list or, where applicable, on the minutes of the general meeting or, in the case of a proxy, on the proxy) 6. motions and proposals made at the general meeting (if the shareholder makes a motion or proposal at the general meeting) 7. email address (if the shareholder requests to receive the materials of the general meeting electronically) 8. image (on documents and papers presented during the verification of identity, which is not recorded but only made available for access)
Purpose of data processing:	Data processing is necessary to ensure the exercise of shareholder rights.
Legal basis of data processing:	The data processing is based on **Article 6 (1) c) of the GDPR**, i.e. the data processing is necessary for the performance of a legal obligation, the legal obligation is defined in the Sections 3:268-3:281 of the Civil Code.
Duration of data processing:	Pursuant to Sections 3:278 (3)-(4) of the Civil Code, the Board of Directors of the Company is obliged to file and preserve the minutes of the general meeting and the attendance list among its own documents and to submit them to the court of registry within thirty days following the close of the general meeting. Pursuant to Section 3:278 (5) of the Civil Code. any shareholder may request the Board of Directors to issue a copy of the minutes of the general meeting or an extract containing part of the minutes. Due to these provisions, the final deletion of personal data may not take place until the limitation period from the date of the dissolution of the Company without

	legal succession has expired. In accordance with Section 6:22 of the Civil Code, the statute of limitation shall, as a general rule, be 5 years. The Company shall also keep a copy of the proxy and the authentic company signature (currently: specimen signature or sample signature) proving the right of representation for the period of time indicated above. The Company shall delete the shareholder's email address after the period of limitation from the date of dispatch of the documents for the general meeting, i.e. as general rule, 5 years according to the provisions of Section 6:22 of the Civil Code. The name, home address and image on the documents and papers presented are subject to verification only, so the period of data processing in this respect is the period during which the shareholder's data from the documents and papers are made available to the Company. The Company's legal representative shall, in the event of a request for data pursuant to Act No. 78 of 2017, process the requested data for the period specified in Act No. 53 of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing.
Rights of the Subject:	The rights set out in Chapter III of this Policy, with the exception that the Subject shall not have the right to data portability, erasure, and objection with regard to the performance of the legal obligation as a legal basis.
Exercising of rights of the Subject:	According to Chapter IV of this Policy.

2.3. Image and sound recording of general meetings

Data processing operations:	The Company may make image and sound recordings of the general meeting in order to ensure the accuracy and authenticity of the minutes. The image and sound recordings are capable of fully reconstructing what was said at the general meeting. The speaker may also object to the image and sound recording before his/her speaking. In the event of an objection before the speaker has spoken, the speech is not audio-visually recorded (however, the minute taker may make an audio recording and summarise the speech in his or her own voice).
Scope of personal data subject to processing:	The image, speech, voice of the Subject
Purpose of data processing:	The purpose of the data processing is to ensure that what is said at the general meeting is accurately, authentically and fully recorded in the minutes of the general meeting, in particular in view of the fact that the Company is a public limited company, which requires particular attention to be paid to transparent operation and compliance with capital market requirements.
Legal basis of data processing:	The processing is based on **Article 6 (1) f) of the GDPR**, i.e. the processing is necessary for the purposes of the legitimate interests pursued by the Company.
Duration of data processing:	One year from the date of the general meeting, in accordance with Section 3:36 (1) of the Civil Code and Section 79 (1) of Act V of 2006 on company registration, court proceedings and winding-up.
Rights of the Subject:	Rights under Chapter III of this Policy.
Exercising of rights of the Subject:	According to Chapter IV of this Policy.

2.4. Data processing in relation to virtual general meeting

[In case of virtual general meeting, the information on the exercise of shareholders' rights set out in points 2.2 and 2.3 shall apply with the following exceptions and additions.]

Data processing operations:	Pursuant to Sections 3:280-3:281 of the Civil Code and the Chapter 14B *"Virtual General Meeting"* of the Articles of Association, the Company may hold general meetings by means of electronic communication (hereinafter referred to as "**Virtual General Meetings**"). Any electronic communications device may be used for the Virtual General Meeting that is capable of the simultaneous transmission of both image and sound which enables the identification of the participants and their mutual, unrestricted communication. Pursuant to Section 3:281 (2) of the Civil Code image and sound recording is made on the Virtual General Meeting including the registration and signing in (see below). The shareholder intending to attend the General Meeting by means of electronic communication shall be obligated to verify its identity (or the representation rights of a proxy) before the General Meeting, at latest 2 hours prior to its starting time by presenting to the Company the documents suitable for the verification of its identity or the representation rights of the proxy, in compliance with the laws in effect at the time, through the electronic communications device that is capable of the simultaneous transmission of both image and sound (hereinafter referred to as "registration"). The Company shall compare the name and home address of the Shareholder as entered in the register of shareholders with the data of the documents and papers presented and the image of the Shareholder as displayed by the device with the image of the Shareholder as shown on the documents and papers. The comparison is for verification purposes only, the Company will not record any further data from the documents and papers presented, nor will make any copies thereof, and the data on the documents and papers will therefore only be accessible to the Company and only for the period during which the Company carries out the verification, with the exception of the registration being recorded on an image and sound recording which will form part of the image and sound recording of the general meeting. The Company's legal representative may, pursuant to Act No. 78 of 2017, request data electronically from the Register of Personal Data and Addresses, the Register of Driving Licences, the Register of Travel Documents, and the Central Register of Aliens to verify the conformity of the Shareholder's data with the data registered and the validity of the documents presented by the Shareholder, which it is obliged to keep. After verification, the Company will provide the Shareholder with a unique identifier (password) for subsequent signing in to the General Meeting, which will be recorded. The shareholder intending to attend the General Meeting by means of electronic communication shall be obligated to verify its prior registration directly before the starting time of the General Meeting. During this, the shareholder shall be obligated to give the unique identifier (password) it has received during the registration and/or to once more present the predetermined documents by the electronic communication device that is capable of simultaneous transmission of both image and sound (hereinafter referred to as: signing in). An image and sound recording will be made on the signing in which will form part of the image and sound recording of the General Meeting.
Scope of personal data subject to data processing:	1. name 2. home address 3. image 4. unique identifier (password) 5. the speech and voice of the Subject
Purpose of data processing:	Data processing is necessary to ensure the participation in virtual general meetings as well as the exercise of shareholder rights.

Legal basis of data processing:	The data processing is based on Article 6 (1) c) of the GDPR, i.e. the data processing is necessary for the performance of a legal obligation, the legal obligation is defined in the Sections 3:280-3:281 of the Civil Code.
Duration of data processing:	One year from the date of the general meeting, in accordance with the Section 3:36 (1) of the Civil Code and the Section 79 (1) of Act V of 2006 on company registration, court proceedings and winding-up.
Rights of the Subject:	The rights under Chapter III of this Policy with the exception of the right to data portability, erasure and objection with regard to the legal basis for the performance of the legal obligation.
Exercising of rights of the Subject:	According to Chapter IV of this Policy.

2.5. Data processing in relation to payment of dividends

Data processing operations:	Pursuant to Section 3:262 of the Civil Code and Articles 27-31 of the Articles of Association, the Company shall pay dividend to its shareholders from its distributable profit which has been ordered for distribution by the general meeting. To fulfil its accounting and tax obligations in relation to the payment of dividends, the Company processes the following personal data of the shareholders.
Scope of personal data subject to data processing:	**For Hungarian resident shareholders:** 1. name 2. birth name 3. place and date of birth (country code) 4. mother's maiden name 5. nationality 6. tax identification number 7. sex 8. home address 9. mailing address 10. number of shares or interim shares 11. ownership percentage 12. bank account number 13. existence of a permanent investment account 14. gross and net amount of dividends 15. amount of tax payable on dividends 16. tax category **For non-Hungarian resident shareholders, in addition to the above:** 17. passport number or tax identification number issued by the Hungarian tax authority 18. address according to his/her residence and, if he or she has one, Hungarian address (place of residence)
Purpose of data processing:	Data processing is necessary to perform the payment of dividends.
Legal basis of data processing:	The data processing is based on Article 6 (1) c) of the GDPR, i.e. the data processing is necessary for the performance of a legal obligation, the legal obligation is defined in Section 3:262 of the Civil Code and the Act CL of 2017 on the Rules of Taxation.

Duration of data processing:	8 years after the adoption of the annual report for the year following the dividend payment in accordance with Section 169 of Act C of 200 on Accounting.
Rights of the Subject:	The rights under Chapter III of this Policy, with the exception of the right to data portability, erasure and objection with regard to the legal basis for the performance of the legal obligation.
Exercising of rights of the Subject:	According to Chapter IV of this Policy.

III. RIGHTS OF THE SUBJECT

The Subject is entitled to the following rights under the GDPR, with an indication for each processing operation of which rights the Subject is not entitled to in relation to the legal basis of the processing.

3.1. Right of information

Subjects are entitled to information on the facts in connection with data processing concerning their personal data processed by the Company prior to the commencement of data processing. Taking into account that the Subjects provide the Company with their personal data themselves, the Company shall perform its obligation to inform as per Article 13 of GDPR by way of the present Policy.

3.2. **Right of access** (Article 15 GDPR)

The Subject has the right to receive feedback from the Company on whether or not his or her personal data are being processed and, if so, the right to access his or her personal data and to obtain information on the purposes, legal basis and duration of the processing, as well as on who is receiving or has received his or her data and for what purposes (including in particular third country recipients and international organisations, where applicable). The Data Subject is entitled to be informed at any time that he or she has the right to obtain from the Company the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data, and to lodge a complaint with a supervisory authority. In the event that data is obtained by the Company from a source other than the Data Subject, the Data Subject may also request information about the source of the data(s) at any time. Where the Company transfers personal data to a third country or an international organisation, the Company shall also inform the Data Subject of the appropriate safeguards for the transfer in accordance with Article 46 of the GDPR.

The first copy of personal data subject to data processing will be provided by the Company to the Subject free of charge. For any further copies the Company may charge a reasonable fee based on administrative costs and adjusted to the volume of data, the amount thereof shall be notified by the Company with the Subject in advance. Where the Subject makes the request by electronic means, the information shall be provided by the Company to the Subject in a commonly used electronic form, unless the Subject requests otherwise. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

3.3. **Right to rectification, amendment** (Article 16 GDPR)

Subjects shall have the right to obtain from the Company the rectification of inaccurate personal data or those recorded erroneously. Where data are incomplete – considering the purpose of data processing – Subjects may obtain the completion thereof. Where the data subject to rectification or completion request concerns data indicated in an official identity card or residence card or other register of public authenticity, the rectification or completion shall require such document to be presented.

3.4. **Right to erasure of personal data („right to be forgotten")** (Article 17 GDPR)

Subjects shall have the right to obtain from the Company the erasure of their personal data, which request the Company shall satisfy in the event one of the following grounds applies:

a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Company;
b) the Subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
c) the Subject objects to the processing pursuant to Article 21(1) of GDPR and there are no overriding legitimate grounds for the processing, or he/she objects to the processing pursuant to Article 21(2) of GDPR for the purpose of direct marketing;
d) the personal data have been unlawfully processed by the Company;
e) the personal data have to be erased for compliance by the Company with a legal obligation in EU or member state law to which it is subject;
f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of GDPR.

Where the Company has made the personal data public and is obliged to erase the personal data, the Company shall take reasonable steps, to inform other controllers which are processing the personal data on the obligation to erase.

Data shall not be erased, when data processing is necessary:

a) for exercising the right of freedom of expression and information;
b) for compliance with a legal obligation which requires processing by law to which the Company is subject (e.g. performance of tax and accounting obligations) or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company;
c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3) of GDPR;
d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of GDPR in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
e) for the establishment, exercise or defence of legal claims.

3.5. **Right to restriction of processing** (Article 18 GDPR)

Subjects shall have the right to obtain from the Company the restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by the Subject, for a period enabling the Company to verify the accuracy of the personal data;
b) the processing is unlawful, and the Subject opposes the erasure of the personal data and requests the restriction of their use instead;
c) the Company no longer needs the personal data for the purposes of the processing, but they are required by the Subject for the establishment, exercise or defence of legal claims;
d) the Subject has objected to processing pursuant to Article 21(1) of GDPR pending the verification whether the legitimate grounds of the Company override those of the Subject. In such event the restriction applies for the duration until it is established, whether there are overriding legitimate grounds for data processing, i.e. whether the legitimate grounds of the Company for keeping and processing the date override the legitimate grounds of the Subject for erasure of the data.

During the restriction data are only stored by the Company without any further processing, unless i) the Subject has consented to further processing measures or ii) the processing of data is necessary for the establishment, exercise or defence of legal claims furthermore iii) for the protection of the rights of another natural or legal person, or iv) for reasons of important public interest of the EU or of a member state.

A Subject who has obtained restriction of processing shall be informed by the Company before the restriction of processing is lifted in a way and form as the restriction of data processing was requested by the Subject.

The Company shall communicate any rectification or erasure of personal data or restriction of processing requested by a Subject and carried out by the Company to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company shall inform the Subject upon request about those recipients who have been notified in accordance with the above.

3.6. Right to object (Article 21 GDPR)

Subjects shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on public interest or enforcement of legitimate interests of the Company or third parties (point (e) and (f) of Article 6(1) of GDPR), including profiling based on those provisions. The Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Subjects or for the establishment, exercise or defence of legal claims.

Subjects shall have the right to object at any time to processing of personal data concerning him or her for direct marketing, which includes profiling (if Company applies such, it shall provide adequate information) to the extent that it is related to such direct marketing. In the event of objection, personal data shall no longer be processed by the Company for direct marketing purposes.

Where personal data are processed for statistical purposes, Subjects shall have the right to object on grounds relating to his or her particular situation, to processing of personal data for such purposes, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

3.7. Right to data portability (Article 20 GDPR)

Considering that data of the Subjects are stored by the Company also in electronic database, Subjects shall have the right to receive the personal data concerning him or her, which he or she has provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company. The right to data portability shall be vested in the Subjects regarding those data, the processing of which in based on the Subject's consent (point a) of Article 6(1) or point a) of Article 9(2) of GDPR) or on performance of contract (point b) of Article 6(1) of GDPR). In the event the Subject requests direct transmission of personal data between controllers, the Company shall indicate whether such is technically feasible.

3.8. Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

Without prejudice to any other administrative or judicial remedy, Subjects shall have the right to lodge a complaint with a supervisory authority, in particular in the member state of his or her habitual residence, place of work or place of the alleged infringement if the Subject considers that the processing of personal data relating to him or her infringes the GDPR.
In Hungary, the supervisory authority is the **National Data Protection and Freedom of Information Authority (1055 Budapest, Falk Miksa u. 9-11., e-mail: ugyfelszolgalat@naih.hu, +36-1-3911400, president: dr. Attila Péterfalvi, www.naih.hu).**

The supervisory authority with which the complaint has been lodged by the Subject shall inform the Subject on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78 of GDPR.

3.9. Right to an effective judicial remedy against a supervisory authority (Article 78 GDPR)

Without prejudice to any other administrative or non-judicial remedy, Subjects shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority (in Hungary, the National Data Protection and Freedom of Information Authority) concerning them. Without

prejudice to any other administrative or non-judicial remedy, Subjects shall have the right to an effective judicial remedy where the supervisory authority which is competent pursuant to Articles 55 and 56 of GDPR does not handle a complaint or does not inform the Subject within three months on the progress or outcome of the complaint lodged pursuant to Article 77 of GDPR. Proceedings against a supervisory authority shall be brought before the courts of the member state where the supervisory authority is established (in Hungary, the Metropolitan Administration and Labour Court shall have jurisdiction and competence for judicial proceedings against the National Data Protection and Freedom of Information Authority).

3.10. Right to an effective judicial remedy against the Company or data processor (Article 79 GDPR)

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority pursuant to Clause 4.8, Subjects shall have the right to an effective judicial remedy where he or she considers that his or her rights under the GDPR have been infringed as a result of the processing of his or her personal data by the Company in non-compliance with the GDPR.

Proceedings shall be brought before the courts of the member state where the Company has an establishment, i.e. before the courts of Hungary. Proceedings may be brought before the courts of the member state where the Subject has his or her habitual residence (in the event this is not Hungary).

3.11. Communication of a personal data breach to the Subjects (Article 34 GDPR)

When the personal data breach is likely to result in a high risk to the rights and freedoms of the Subjects, the Company shall communicate the personal data breach to the Subject without undue delay. Such communication shall describe in clear and plain language the nature of the personal data breach and contain at least the following information and measures:

a) the name and contact details of the data protection officer or other contact point where more information can be obtained;
b) the likely consequences of the personal data breach;
c) the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the Subjects regarding the personal data breach shall not be required if any of the following conditions are met:

a) the Company has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
b) the Company has taken subsequent measures which ensure that the high risk to the rights and freedoms of Subjects is no longer likely to materialise;
c) the communication would require disproportionate effort.

In the events described above, Subjects shall be notified by way of publicly disclosed information or such similar measures shall be taken as to ensure notification of the Subject of similar effectiveness.

IV. ENFORCEMENT OF SUBJECT'S RIGHTS, LODGING OF REQUESTS, CONTACTING THE COMPANY

4.1. When exercising their rights, Subjects shall forward requests possibly i) in writing, via mail ii) personally to the Company's registered seat or iii) via e-mail to the e-mail address of the Company, which can be found in section 1.1.1.

4.2. In the event doubts arise as to the identity of the Subject or data provided are not sufficient for identification, the Company shall have the right to request from the Subject further identification data necessary and suitable for confirmation of identity.

4.3. When the person lodging the request shall fail to confirm his or her identity beyond doubt, and thus the Company may not identify him or her, it may refuse the processing of such request.

4.4. The Company shall without undue delay, yet by all means within one month from the receipt of the request inform the Subject on measures taken on the basis thereof. If needed, considering the complexity and the number of requests, this deadline may be extended by further two months. The Company shall inform the Subject on the extension of the deadline along with the indication of the reasons for such delay within one month from the receipt of such request.

4.5. In case the Subject has lodged the request electronically, notification shall be possibly rendered electronically, unless requested otherwise by the Subject.

4.6. In the event the Company shall not take measures based on the request by the Subject, it shall without delay, yet no later than within one month from the receipt of the request notify the Subject regarding the reasons of absence of such measures and on the possibility of the Subject to lodge a complaint at a supervisory authority and to exercise his or her right to legal remedy before court.

4.7. Information as per Articles 13 and 14 of GDPR and notifications and measures as per Articles 15–22 and 34 of GDPR shall be provided by the Company free of charge. When a request is obviously inadmissible or – due to the fact that it is reoccurring – exaggerated, considering the administrative costs in connection with rendering the information or notification requested, or the performance of measure requested, the Company:

a) may charge a reasonable fee or
b) may refuse to take actions on the basis of the request.

V. DATA PROCESSORS

The following data processors have been hired by the Company for data processing activities to be carried out:

5.1. **KELER Központi Értéktár Zártkörűen Működő Részvénytársaság**
seat: 1074 Budapest Rákóczi út 70-72.,
company registration number: 01-10-042346,
TAX number: 10873151-2-44
e-mail: keler@keler.hu
website: www.keler.hu
phone: +36 1 483 6100
fax: +36 1 342 3539

KELER Central Securities Depository Limited Liability Company keeps the register od shareholders of the Company and handles the payment of dividends.

5.2. **HVG Kiadó Zrt.**
seat: 1037 Budapest, Montevideo utca 14
company registration number: 01-10-041172
TAX number: 10226353-2-41
e-mail: hvg.hu@hvg.hu
website: www.hvg.hu
phone.: +36 1 436-2000
fax.: +36 1 436-2010

HVG provides IT services to the Company, in the course of which it has access to data processed by the Company.

5.3. **FINACONT Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság**
seat: 1062 Budapest, Aradi utca 16. II/2.
company registration number: 01-09-703495

TAX number: 12788886-2-42
e-mail: finacont@finacont.com
website: www.finacont.com
phone: +36 1 345 0092

FINACONT Service and Consulting Limited Liability Company provides payroll and social security administration services to the Company. In order to calculate the tax and contributions payable on dividends to shareholders, the Company transmits register of shareholders extracts containing information on the amount of dividends payable.

5.4. **Költő és Társa Ügyvédi Iroda**
seat: 1124 Budapest, Fürj utca 2.
registration number: 3533
TAX number: 18150715-2-41
e-mail: denes@kolto.hu
phone: +36 20 9425518

Költő and Partners Law Firm provides general legal representation of the Company. The Law Firm actively participates in the preparation and conduct of general meetings, in particular, but not limited to, the verification of the identity of shareholders, the request for information pursuant to Act No. 78 of 2017, the preservation of attendance sheets and minutes and their submission to the court of record.

5.5. **Graphisoft Park Engineering & Management Korlátolt Felelősségű Társaság**
seat: 1031 Budapest, Záhony utca 7.
company registration number: 01-09-307921
TAX number: 26209144-2-41
e-mail: info@graphisoft.com
Graphisoft Park Engineering & Management Limited Liability Company is a subsidiary of the Company.

5.6. **Graphisoft Park Ingatlanfejlesztő Korlátolt Felelősségű Társaság**
seat: 1031 Budapest, Záhony utca 7.
company registration number: 01-09-865266
TAX number: 13630621-2-41
e-mail: info@graphisoft.com
Graphisoft Park Real Estate Development Limited Liability Company is a subsidiary of the Company.

5.7. **Graphisoft Park Services Ingatlanüzemeltető és Szolgáltató Korlátolt Felelősségű Társaság**
seat: 1031 Budapest, Záhony utca 7.
company registration number: 01-09-907477
TAX number: 14518517-2-41
e-mail: info@graphisoft.com
Graphisoft Park Services Property Management and Services Limited Liability Company is a subsidiary of the Company.

5.8. **Graphisoft Park South I. Korlátolt Felelősségű Társaság**
seat: 1031 Budapest, Záhony utca 7.
company registration number: 01-09-286801
TAX number: 25744020-2-41
e-mail: info@graphisoft.com
Graphisoft Park South I. Limited Liability Company is a subsidiary of the Company.

5.9. **Graphisoft Park South II. Korlátolt Felelősségű Társaság**
seat: 1031 Budapest, Záhony utca 7.
company registration number: 01-09-286800
TAX number: 25743988-2-41
e-mail: info@graphisoft.com

Graphisoft Park South II Limited Liability Company is a subsidiary of the Company.

Budapest, 1st October, 2021.

Graphisoft Park SE Ingatlanfejlesztő Európai Részvénytársaság
represented by: Kocsány János CEO