

**SPRINT ASSET HUNGÁRIA ALAPKEZELŐ ZRT.**

**DATA PROTECTION INFORMATION**

Approved by Resolution No. 1/2025 (III.10.) IG

Effective: 10 March 2025

**DATA PROTECTION INFORMATION**

**SPRINT ASSET Hungária Fund Management Private Limited Company** (registered office: 1138 Budapest, Révész utca 27. 4. em.; hereinafter referred to as "**the Company**") is committed to exercising the utmost care in the processing and protection of personal data, in full compliance with legal requirements. In line with this commitment, when developing its internal procedures for data management, data processing and data deletion, the Company paid particular attention to legal requirements, and the nature of the Company's activities and its legal relationships with its customers and partners.

In view of the above, the Company has drawn up this Privacy Policy, which provides detailed information on the following:

- (i) how and for what purpose(s) it processes your personal data;
- (ii) what rights you have in relation to the data processed by the Company.

## 1. Applicable legislation, definitions

### 1.1. Applicable legislation

- (b) (a) Regulation (EU) 2016/679 of the European Parliament and of the Council 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) (hereinafter: "GDPR");
- (c) Act CXII of 2011 on the right to self-determination in relation to information and freedom of information (hereinafter: "**Infotv.**");
- (d) data protection provisions of certain sectoral legislation, including, but not limited to:
  - (i) Act CXX of 2001 on the Capital Market ("**Tpt.**"),
  - (ii) Act XVI of 2014 on Collective Investment Forms and Their Managers and on the Amendment of Certain Financial Laws ("**Kbftv.**"),
  - (iii) Act CXXXIX of 2013 on the Magyar Nemzeti Bank ("**MNBtv.**"),
  - (iv) Act CL of 2017 on the Rules of Taxation ("**Art.**"),
  - (v) Act C of 2000 on Accounting ("**Számviteli tv.**"),
  - (vi) Act V of 2013 on the Civil Code ("**Ptk.**"),
  - (vii) Act C of 2012 on the Criminal Code ("**Btk.**"),
  - (viii) Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing ("**Pmt.**")
  - (ix) Act XLIII of 2021 on the establishment and operation of a data reporting background related to the identification tasks of financial and other service providers ("**Afad.**")

### 1.2. Definitions

The following definitions have the following meanings in accordance with the provisions of the GDPR and the Infotv.

- (a) "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, an

identification 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;

- (b) '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, erasure or destruction;
- (c) *special data*: any data belonging to special categories of personal data, i.e. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, health data and personal data concerning the sex life or sexual orientation of a natural person;
- (d) *criminal personal data*: personal data generated in connection with a criminal offence or criminal proceedings, during or prior to criminal proceedings, by authorities authorised to conduct criminal proceedings or investigate criminal offences, as well as by the penal system, personal data relating to the data subject's criminal record;
- (e) personal data relating to the physical or mental health of a natural person, including data relating to health services provided to a natural person, which contains information about the health status of the natural person;

## **2. Data processing activities**

### 2.1. Natural person customer/partner (their representatives)

In the course of its data processing activities, the Company shall process the personal data of natural person customers/partners (their representatives) in accordance with (i) the law, (ii) other regulations governing the Company's activities, (iii) contracts concluded by the Company with the customer/partner, and (iv) the Company's own procedural rules on data processing. The Company carries out its data processing activities in accordance with the principles set out in these internal rules.

### 2.2. Non-natural person customer/partner

In the case of non-natural person clients/partners, data processing activities arise in relation to the following:

- (a) contact person;
- (b) representative, authorised representative;
- (c) beneficial owner.

### 2.3. Special data

The Company does not process special data. Special data may come to the Company's attention primarily during communication with the data subject, based on information provided by the data subject. The Company only processes special data if the data subject consents to the processing or if it is required by law.

### **3. Scope of personal data processed**

3.1. The personal data processed by the Company includes, in particular, the following:

- (a) name, birth name, place of residence, contact address, place and date of birth, nationality, mother's birth name,
- (b) tax identification number;
- (c) identity document details (ID card, residence card, passport);
- (d) contact details (telephone number, e-mail address, electronic access);
- (e) bank account number;
- (f) other data specified by law and necessary for compliance with the law.

Please note that providing the above data may be necessary to comply with legal or regulatory requirements in order to establish and maintain a legal relationship (business relationship) with the Company. Providing contact details is particularly necessary for customer service, information provision and complaint handling.

Accordingly, failure to provide the data in question may result in the inability to establish a business relationship (legal relationship) with the Company, or may necessitate its termination.

3.2. In addition to the provisions of Section 3.1, the Company processes the following personal data:

- data relating to orders and performance;
- data related to marketing;
- your comments, suggestions and complaints;
- recorded telephone conversations and electronic correspondence with you;
- information about you available from public databases (e.g. company register, court and official records, and, where applicable, information about you publicly available on social media);
- personal circumstances disclosed by you to a Company employee (e.g. family member's birthday) that may be relevant to your business relationship with the Company;
- a summary of what was said during personal meetings, if the Company is required to record this in accordance with the relevant legal provisions; - personal codes and classifications generated by the Company (e.g. customer codes).

3.3. If the representative, authorised representative or contact person of a non-natural person customer/partner does not expressly indicate that the e-mail address, or other contact details provided by them are not the personal data of the representative, authorised representative or contact person, the Company may reasonably assume that the contact details provided (e-mail, telephone number) are the data of the non-natural person customer/partner in question.

#### 4. Legal basis, content, purpose and duration of data processing

##### 4.1. Content, purpose and duration of data processing according to legal grounds

The Company processes personal data in accordance with Article 6 of the GDPR and on the following legal bases. Data will be processed for the periods specified in the table below, with the proviso that the personal data in question may be processed until the expiry of the longest of the periods specified for each legal basis.

| Legal basis for data processing (based on the GDPR)  | Content and purpose of data processing content, purpose  | Duration of data processing  | Additional legal basis for data processing   |
|--|--|--|--|
| <p><b>Contractual legal basis</b> (GDPR Article 6(1)(b)): data processing is necessary for the performance of a contract in which the data subject is a party, or prior to the conclusion of the contract prior to the conclusion of the contract to take steps prior to entering into a contract at the request of the data subject necessary</p> | <p>The Company primarily uses personal data for the purposes of providing the services offered by the Company and for the purposes mutually agreed upon by the parties. contractual obligations mutually undertaken by the parties contractual obligations, and preparation of a contractual relationship.</p> | <p>a) securities secret retention regarding regulations otherwise 8 years</p> <p>b) Accounting Act: Receipts: 8 years</p> <p>c) Civil Code: statute of limitations</p> | <p>a) Tpt.<br/>b) MNBtv.<br/>c) Art.<br/>d) Számviteli tv.<br/>e) Ptk, and<br/>f) Pmt.</p>                                 |
| <p><b>Compliance with a legal obligation Legal basis</b> (GDPR Article 6(1)(c)) the processing the Company legal legal necessary for the fulfilment of legal</p>   | <p>The Company, as an investment fund manager, is subject to data reporting obligations under legislation and official and court orders, which the Company must comply with.</p>   |  | <p>a) Kbtv.<br/>b) Tpt.<br/>c) MNBtv.<br/>d) Art.<br/>e) Számviteli tv.<br/>f) Pmt.<br/>g) Afad,<br/>h) IT regulations</p> |

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|--|---|---|--|
| <p><b>Legitimate interest legal basis</b><br/>(GDPR Article 6(1)(f))<br/>the data controller<br/>the data controller or a third party<br/>legitimate interests, unless these interests are overridden by the interests of the data subject interests or fundamental rights and freedoms of the data subject, which are protected by law, shall take precedence over the legitimate interests pursued by the controller. protection protection, in particular where the data subject is a child</p> | <p>The Company shall also be entitled to process personal data and supporting documents if this is necessary for the legitimate interests of the Company or a third party related to the Company, provided that the enforcement of such interests is proportionate to the restriction of the right to the protection of the personal data of the data subject.</p> <p>Such cases include, in particular:</p> <ul style="list-style-type: none"> <li>a) the customer's claim to ownership of securities enforceability and verification of a customer's claim to ownership of securities</li> <li>b) enforcement and verification of any other property or contractual claims, taking into account the rules on limitation periods taking into account</li> <li>c) criminal law claims</li> <li>d) risk management</li> <li>e) mapping client needs, submitting offers, unless you have opted out of this under Article 21 of the GDPR</li> <li>f) quality and efficient customer service</li> <li>g) complaint handling, consumer protection and investor protection considerations</li> <li>h) prevention and deterrence of internal fraud</li> <li>i) customer relationship management</li> </ul> | <p>Statute of limitations rules</p> <p>Relevant</p> | <ul style="list-style-type: none"> <li>a) Kbftv.</li> <li>b) Tpt.</li> <li>c) MNBtv.</li> <li>d) Art.</li> <li>e) Ptk.</li> <li>f) Btk.</li> <li>g) Pmt.</li> <li>h) Afad</li> </ul> |
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| <p>Legal basis for <b>consent</b> (GDPR Article 6(1)(a)) the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> | <p>In the absence of the above legal bases, data processing may take place with the explicit consent of the data subject.</p> <p>The advertising and marketing activities and personal data provided by interested parties for the purpose of establishing contact.</p> | <p>Until the data subject withdraws their consent</p> | <p>-</p> |
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#### 4.2. Data processing based on the data subject's consent

- a) With regard to data processing based on the data subject's consent, in accordance with Article 4 of the GDPR, "the data subject's consent" means:

the data subject's will **(i) voluntary, (ii) specific, (iii) based on adequate information, and (iv) unambiguous**, by which the data subject indicates **his or her consent to the processing of personal data relating to him or her** by means of a statement or by means of a confirmatory action that is unambiguous.

- b) Consent is not considered to be freely given if the data subject does not have a real or free choice and is unable to refuse or withdraw consent without detriment.
- c) If the data processing serves several purposes at the same time, consent must be given for all data processing purposes. The Company endeavours to ensure that, if the statement containing the consent is included in a statement covering other matters, the individual statements are presented in a comprehensible manner and separately for each purpose.
- d) If the data processing is not carried out for the purpose of (i) fulfilling a contractual obligation, (ii) fulfilling a legal obligation, or (iii) legitimate interest, the processing of personal data may only take place with your express consent as the data subject.
- e) You have the right to withdraw your consent at any time. However, the withdrawal of consent is only effective for data processing based on consent, not for data processing based on other legal grounds. The withdrawal of consent does not affect the lawfulness of data processing prior to the withdrawal.

## **5. Deletion of data**

The Company shall process data to the extent and for the period specified in the legislation and/or necessary to achieve the purpose of data processing. Upon the cessation of these conditions/purposes, the Company **shall (i) delete** the data or **(ii) anonymise it** in accordance with the principle of limited storage, if possible. The Company shall decide at its own discretion whether to anonymise instead of erasing.

Anonymisation under the GDPR means permanently removing the personal nature of the data so that its connection to the data subject can no longer be established, even by the Company.

## **6. Access to data, data transfer**

6.1. The Company shall ensure that personal data is accessible to those persons who need it for the purposes of processing the data in question. The necessary IT system and support, appropriate to the purpose of data processing, has been developed and is provided.

6.2. If, in the Company's opinion, it is necessary on the basis of the legal basis for data processing, the Company is entitled and obliged to transfer or make available the data it processes to the person entitled to do so. The provisions of the Bszt. and the Tpt. relating to securities secrets shall also apply to data transfer.

The Company may also transfer the personal data it processes to the following persons:

- a) intermediaries (dependent agents) in a contractual relationship with the Company,
- b) persons performing expert, advisory or specialist advisory activities outsourced to the Company or requiring special expertise,
- c) data processors involved in the performance of technical tasks related to data processing operations

to the extent and for the duration necessary for these persons to perform their tasks, but at most to the same extent and for the same period as the data processing specified above.

6.3. The Company is entitled to use a data processor for data processing activities throughout the entire period of data processing. The Company undertakes to ensure that its data processors ensure the lawful and secure processing of data and enable data subjects to exercise their rights under the law.

6.4. If it is necessary for the transfer of the Company's claim against the data subject, or for the management or enforcement of a delayed or expired claim, the Company may transfer the data of the customer/partner concerned. To third parties to whom it is necessary for the transfer, management or enforcement of the claim (in particular, to the person to whom the claim is transferred or to whom the Company entrusts the management or enforcement of this claim).

6.5. The Company is entitled to perform data processing activities jointly with other data controllers within the framework of joint data processing and to process the data of the customer/partner. Data processing and joint data processing are governed by the provisions of the data protection legislation in force at any given time and the Company's data protection policy.

- 6.6. In addition to the above cases, data may be transferred in the following cases:
- a) in order to comply with data reporting obligations to authorities and/or courts;
  - b) in the event of a legal obligation to provide data;
  - c) in connection with the performance of a contract or the fulfilment of obligations assumed in connection with a contract, as well as for the purpose of monitoring such performance or fulfilment, if the product or service concerned is provided by the Company jointly with a third-party partner (e.g. distribution).

6.7. At the request of the data subject, the Company shall provide information about the recipients of data transfers.

6.8. The Company shall ensure that the third parties referred to in this Section 6 process data in accordance with the data protection and confidentiality regulations in force at any given time.

## **7. Your data protection rights**

- 7.1. As a customer, you have the following rights:
- a) to request information about the data processed by the Company, including copies of such data upon your express request;
  - b) requesting the correction or modification of data;
  - c) requesting the deletion of data;
  - d) requesting the transfer of data;
  - e) to object to unauthorised data processing or data transfer;
  - f) initiating the restriction of data processing;
  - g) initiating legal remedies.
- 7.2. The rights set out in points 7.1(a) to (g) shall be granted by the Company upon request. The deadline for processing requests is 25 days after the request is received by the Company. As a customer, you may submit your request (i) to the Company's customer service department or (ii) electronically to the Company's email address. The date of receipt of the request shall be the date on which the request is received by the Company (i) in full and (ii) in an authentic (verifiable) manner. If, in the Company's opinion, the content of the request is unclear or incomplete, the Company shall be entitled to request further information or clarification.
- 7.3. If, as a result of complying with a request for information or copies, the Company would be required to disclose or transfer personal data or information classified as confidential, the condition for complying with the obligation to provide information or copies is that the applicant submitting the request provides the Company with appropriate proof of (i) their identity, and (ii) their right to obtain the data. If the applicant fails to comply with this obligation to provide proof, only general information may be provided to them in relation to the request.
- 7.4. The Company shall be entitled to refuse to comply with the request if:

- a) the fulfilment of the request is precluded by law or by a contract concluded with the applicant (or the data subject);
- b) the applicant does not submit a request concerning his or her own data and does not have a valid and effective authorisation to submit the request and to access the data concerned by the request, and/or does not credibly prove his or her identity to the Company;
- c) if, in the Company's opinion, the request is clearly unfounded, excessive or has been submitted abusively (e.g. if the data subject already has the requested data because it has been made available to them as a result of prior information or is otherwise accessible to them);
- d) the Company has received the data from another data controller in such a way that, according to the information provided by the data controller transferring the data, the data subject's right to request access is restricted and this restriction may also apply under Hungarian law;
- e) the data subject refuses to pay the amount of the reimbursement of costs, if such costs are chargeable in connection with the fulfilment of the request.

7.5. If the Company does not grant the request, it shall communicate the factual and legal reasons for rejecting the request to the applicant in writing within 25 days of receiving the request. If the request is rejected, the data subject may (i) seek **legal remedy in court** or (ii) contact **the National Authority for Data Protection and Freedom of Information (NAIH)**. The court shall have jurisdiction to hear the case. The case may also be brought before the court of the data subject's place of residence or domicile, at the data subject's discretion.

7.6. Complaints and requests relating to data processing shall otherwise be governed by the Company's rules on complaint handling.

## 8. Contact details

### 8.1. Company contact details

The Company's contact details for data protection matters:

address: 1138 Budapest, Révész utca 27. 4th floor

### 8.2 Contact details for the NAIH:

<http://naih.hu/>

## 9. Security of data processed by the Company

9.1. The Company primarily stores the personal data it processes in its own systems or in the systems of third parties over which the Company has control. During data storage, the Company ensures that

- (i) no unauthorised persons have access to the data,
- (ii) the confidentiality of the data is not compromised,
- (iii) the confidentiality of the data is maintained throughout the entire period of data processing.

9.2. The Company stores data in controlled, closed systems, ensuring at all times an adequate level of data protection, which is ensured by the implementation of various technical and organisational measures. These measures must provide a level of security appropriate to the risks involved and the nature of the personal data, taking into account the state of the art, the nature, scope and context of the processing, scope, context and purposes of processing, as well as the risk to the rights and freedoms of natural persons caused by varying likelihood and severity. To this end, the Company develops and operates systems procedural rules that ensure that information is only accessible to those who need it to perform their duties, and that minimise the possibility of anyone using the information obtained in the course of their duties for purposes other than those for which it was intended, or in a manner contrary to those purposes.

## **10. Entry into force, amendments**

10.1. This Privacy Policy shall enter into force on 10 March 2025.

10.2. The Company is entitled to unilaterally amend this Privacy Policy at any time, which it shall announce on its website.

Dated: Budapest, 10 March 2025.