

Privacy Notice

on data processed for the purpose of organising and conducting Provident's Anniversary Conference and Award Ceremony event

I. GENERAL INFORMATION, THE DATA CONTROLLER

1.1. Identity of the Data Controller

With regard to the processing activities specified in this Privacy Notice (the "Privacy Notice"), the data controller is Provident Pénzügyi Zártkörűen Működő Részvénytársaság (registered office: 1095 Budapest, Lechner Ödön fasor 10/B.; company registration number: 01-10-044542; e-mail: provident@provident.hu; website: www.provident.hu; telephone number: +36 1 99 99 666; name and contact details of the Data Protection Officer: Dr Éva Hornyák-Pakai, adatvedelem@provident.hu; hereinafter referred to as "Provident", the "Company" or the "Data Controller").

1.2. Applicable legislation

Provident carries out its activities under the laws of the European Union and Hungary. Data processing is governed primarily by the General Data Protection Regulation of the European Union [Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC; hereinafter referred to as the "GDPR"], as well as Act CXII of 2011 on Informational Self-Determination and Freedom of Information.

1.3. Scope of the Privacy Notice and the Data Subject

This Privacy Notice applies to personal data processed for the purpose of organising and conducting Provident's Anniversary Conference and Award event.

For the purposes of the processing activities covered by this Privacy Notice, the Data Subject is any person who participates in the Company's Anniversary Conference and Award Ceremony event and, for this purpose, registers on the website designated for registration, as well as any accompanying person of the Data Subject. The invited person shall fulfil the obligation to provide information to the accompanying person about data processing.

II. MAIN CHARACTERISTICS OF THE DATA PROCESSING

2.1. Principles of data processing

Provident processes personal data lawfully, fairly and transparently in relation to the Data Subject, and ensures that the data are accurate and kept up to date. Provident ensures that the Data Subject may exercise their rights and takes the necessary measures to ensure that the processing is lawful at every stage.

2.2. Purpose and legal basis of the processing, duration of the processing and categories of personal data processed

The purpose and legal basis of the processing, the duration of the processing and the categories of personal data processed are set out in Annex 1 to this Privacy Notice.

Provident collects the personal data directly from the Data Subject.

2.3. Data processing procedure

The Data Subject receives the registration link required for participation in the event by e-mail. The Data Subject provides their personal data through the relevant interface and completes the registration process. Lumen Creatives Kft. acting as a data processor, assists Provident in organising and conducting the conference.

2.4. Data security and access to the data

Provident ensures the security of the data, implements the technical and organisational measures and establishes the procedural rules necessary to satisfy data security requirements. Provident records the

data it processes in accordance with the applicable legislation, ensuring that access is granted only to employees and other persons acting on behalf of or in the interests of Provident who require access to the data for the performance of their duties.

All persons acting on behalf of or in the interests of Provident are authorised to access only the data whose processing is necessary for the performance of their duties. Such persons are required to treat the data confidentially.

III. RIGHTS OF DATA SUBJECTS AND THE EXERCISE OF THOSE RIGHTS

3.1. Rights of Data Subjects

Information and access: The Data Subject has the right to receive information about the processing of their personal data. Provident informs the Data Subject about the processing when the data are collected. The Data Subject may request comprehensive information about the processing of their data at any time during the processing. The Data Subject may request that Provident provide them with a copy of the data.

Rectification: The Data Subject may request that Provident rectify inaccurate personal data relating to them and complete incomplete personal data.

Erasure and withdrawal of consent: The Data Subject may withdraw their consent to the processing of their data at any time and may request the erasure of their data. Provident shall refuse erasure only where the processing is based on legislation or where the processing is necessary for the establishment, exercise or defence of legal claims. The right to withdraw consent at any time shall not affect the lawfulness of processing based on consent before its withdrawal.

Restriction: The Data Subject has the right to request the restriction of processing in the following cases:

- a) the Data Subject contests the accuracy of the personal data, in which 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 personal data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of the processing, but the Data Subject requires the data for the establishment, exercise or defence of legal claims;
- d) the Data Subject has objected to the processing, in which case the restriction shall apply for the period required to establish whether the legitimate grounds of the Data Controller override the legitimate grounds of the Data Subject.

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

Objection: Where the processing is based on the legitimate interests pursued by Provident or by a third party, the Data Subject has the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data. In such a case, the Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or where the processing is related to the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the Data Subject has the right to object at any time to the processing of personal data concerning them for such purposes.

3.2. Ensuring the rights of the Data Subject and handling the Data Subject's requests

Provident informs the Data Subject about the processing of their data at the time of the initial contact. At the Data Subject's request, Provident shall make this Privacy Notice available to the Data Subject.

The Data Subject may submit a request to exercise their rights to Provident through any of the contact details specified in Section 1.1. Provident shall examine the request without undue delay, decide whether to comply with the request and take the necessary measures.

Provident shall inform the Data Subject of the measures taken within one month. The information shall, in all cases, include the measures taken by Provident or the information requested by the Data Subject. Where Provident refuses to comply with the request, meaning that it does not take the measures necessary to comply with the request, the information shall include the legal basis and reasons for the refusal and the remedies available to the Data Subject.

Where, due to the circumstances or method of submitting the request, it is uncertain whether the request originates from the Data Subject, Provident may request that the applicant verify their entitlement or submit the request in a manner that enables the entitlement to be clearly established. The Company retains the Data Subject's request and the response provided to it for five years.

3.3. Legal remedies

In the event of an infringement of the Data Subject's rights, the Data Subject may request that Provident cease the unlawful processing and review the processing or the rejection of the Data Subject's request. Provident shall investigate all such complaints submitted by the Data Subject and inform the Data Subject of the outcome of the investigation. Data Subjects may submit their complaints using the contact details specified in Section 1.1.

In the event of an infringement of their rights, the Data Subject has the right to bring proceedings before a court. At the Data Subject's choice, the proceedings may also be brought before the competent regional court of the Data Subject's place of residence or place of stay.

The Data Subject may also lodge a complaint directly with the Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; telephone: +36 1 391 1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

Annex 1

Characteristics of the data processing carried out by Provident

Purpose of data processing	Categories of data processed	Legal basis for the data processing	Duration of the data processing	Data transfer
Completion of registration for the Anniversary Conference and Award Ceremony event	- name, - e-mail address, - first name of the accompanying person, - selected menu	Legitimate interest in conducting the conference [Article 6(1)(f) of the GDPR] In respect of special categories of personal data, the explicit consent of the Data Subject [Article 6(1)(a) of the GDPR]	Provident processes the personal data taking into account the principle of purpose limitation.	The Company is assisted in organising the annual conference by Lumen Creatives Kft (registered office: 1118 Budapest, Torbágy u. 12. 6/21, as a result of which the Partner processes the data provided during registration on behalf of Provident as a Data Processor. During the development of the website required for registration, WP Online Magyarország Kft. (registered office: 1094 Budapest, Balázs Béla u. 15-21. D. lph. 2/4. acts as a Data Processor.
Preservation of events that occurred at the event by means of photographs and video recordings, and the creation of such photographs and recordings	Photographs and video recordings made of the Data Subjects	Legitimate interest in preserving the events and memories of the event [Article 6(1)(f) of the GDPR], based on the statutory provisions applicable to crowd recordings [Section 2:48(2) of the Civil Code] In the case of an individual recording, the consent of the Data Subject given by conduct implying consent.	Provident processes the personal data taking into account the principle of purpose limitation.	Todoroff Lázár, 56798551 (1027 Budapest, Szász Károly u. 6. fszt. 1.)
For the purpose of promoting the brand, promotion of the event[ÉH1], publication of the fact that the event was held, and, in connection with this, publication of photographs and videos in the internal and external communications of the Company and its parent company (International Personal Finance plc.) and its subsidiaries (external communication including, in particular but not limited to: Provident offices, Provident's public Facebook page, YouTube, LinkedIn, Instagram, the Company's websites and other platforms, PR materials, online media platforms, press releases, printed press, as well as platforms used by IPF) (internal communication including, in particular but not limited to: closed	Photographs and video recordings made of the Data Subjects	Legitimate interest in employer branding [Article 6(1)(f) of the GDPR]	Provident processes the personal data taking into account the principle of purpose limitation.	International Personal Finance plc. and its subsidiaries

Facebook group and internal communication platforms)

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