

# Data Privacy Notice

## Introduction

Your trust is very important to us. We handle your personal data with the utmost care and ensure that it is kept safe and secure at all times.

Below, you will find detailed information about how we process and protect your personal data.

**Proworx Digital Ltd.** (registered office: Budapest 1026 Harangvirág str. 5.II/3.; company registration number: 01 09 334879; hereinafter referred to as “Proworx Digital” or the “Company”) processes your personal data in accordance with this Data Privacy Notice, effective from **1 September 2025**.

### Recipients of Personal Data

The personal data we collect may be accessed by the following entities:

**Proworx Digital Ltd.** (registered office: Budapest 1026 Harangvirág str. 5. II/3.; company registration number: 01 09 334879) – ESG platform division

**Kingfisher Digital PLC** (registered office: Budapest 1026 Harangvirág str. 5. II/3.; tax number: 01 10 142522) – ESG division

### Data Controller and Data Protection Officer

The processing of personal data is carried out by **Proworx Digital**, acting as the **Data Controller**. **Proworx Digital** has appointed a **Data Protection Officer (DPO)**, who may be contacted for any inquiries related to data protection.

**Name:** Szabolcs Timku

**E-mail:** szabolcs.timku@proworx.hu

This notice sets out the legal basis and methods by which we process personal data provided by you, obtained from third parties, or collected from other sources.

In line with the **General Data Protection Regulation (EU) 2016/679 (GDPR)** and the **Hungarian Act on the Right to Informational Self-Determination and Freedom of Information**, **Proworx Digital** qualifies as the Data Controller.

References to the “GDPR” also include corresponding provisions under Hungarian law.

You have the right to request access to, rectification or restriction of your personal data, to object to its processing, and to exercise the right to data portability.

Requests concerning the exercise of data subject rights may be submitted in writing or via the contact details below:

**Postal address:** Proworx Digital Ltd., Budapest 1026 Harangvirág str. 5. II/3.

**E-mail:** hello@proworx.hu

## Categories of Personal Data Collected

We may collect and process the following personal data:

- Full name
- Company or organization name
- Position or department
- Business e-mail address
- Telephone number

Please note that, under the GDPR and relevant national regulations, we may process personal data without your consent in the following cases:

- When necessary for entering into or performing a contract with you
- When required to fulfil legal or regulatory obligations
- When necessary to protect life, health, or property, or to respond to a public health emergency
- When processing is carried out in the public interest, such as publication or oversight, within reasonable limits
- When processing data you have made public, or that has otherwise been lawfully made public
- In other cases provided by law or administrative regulation

## How We Protect and Store Your Data

We take appropriate technical and organizational measures to safeguard your personal data against accidental loss, unauthorized access, or misuse.

Access to personal data is strictly limited to individuals with a legitimate business need.

All individuals handling your data are bound by confidentiality obligations and act only under authorized instructions.

We have established procedures to address any suspected data breaches.

Where legally required, we will notify you and the relevant supervisory authority of any breach affecting your personal data.

## Where Your Data Is Stored

Your personal data is securely stored in a cloud environment operated by **Amazon Web Services (AWS)**, located in **Frankfurt am Main, Germany**.

## Use of Personal Data

We process and use your personal data in accordance with the applicable legal basis and for the following purposes:

- To fulfil reporting obligations defined under the **ESG Act**, in line with the guidance of the legislator and the **Supervisory Authority for Regulated Activities**.

If we need to process your personal data for a purpose different from the original one, we will ensure that the new purpose is compatible with the initial reason for collection. Should processing for a new purpose become necessary, we will inform you in advance and explain the applicable legal basis.

In certain cases, we may anonymize personal data so that it can no longer be associated with you. Such anonymized data may be used without further notice.

## Disclosure of Personal Data

**Proworx Digital** does not sell, rent, or lease your personal data to third parties.

However, personal data may be disclosed if required by law:

- To third parties (e.g., partner organizations or suppliers) in connection with your use of the Kingfisher Platform or our business relationship with you
- To comply with legal or regulatory requirements, enforce agreements or terms of use, or protect the rights, property, or safety of Proworx Digital, its clients, or others

This may include sharing data with other organizations for the purposes of fraud prevention, compliance with anti-money-laundering obligations, and risk reduction.

## Retention Period

Your personal data will be retained only as long as necessary to fulfil the purposes for which it was collected, in accordance with the guidance of the legislator and the Supervisory Authority for Regulated Activities.

When determining the retention period, we consider:

- the volume, nature, and sensitivity of the data,
- the potential risk of unauthorized use or disclosure, and
- the applicable legal and regulatory requirements.

## Your Rights

Under the GDPR, you are entitled to the following rights:

- **Access:** You may request a copy of your personal data.
- **Rectification:** You may ask us to correct any inaccurate or incomplete data.
- **Objection:** You may object to the processing of your personal data in certain situations.
- **Restriction:** You may request that the processing of your personal data be limited.
- **Withdrawal of consent:** You may withdraw your consent at any time. Withdrawal does not affect the lawfulness of prior processing.

## Changes to This Notice

We may update this Data Privacy Notice from time to time. Any changes will be published as a new version on our website.

Upon your next login to the Kingfisher Platform, you will be prompted to review and accept the updated version.

## How to Make a Complaint

We hope to resolve any concerns you may have regarding the processing of your personal data. However, under the GDPR, you have the right to lodge a complaint with the competent data protection authority.

### **National Authority for Data Protection and Freedom of Information (NAIH)**

<https://www.naih.hu>

We kindly ask that you contact us first with any concerns before approaching the authority, so we can attempt to resolve the issue directly.

- **Postal address:** Proworx Digital Ltd., Budapest 1026 Harangvirág str. 5. II/3.
- **E-mail:** [hello@proworx.hu](mailto:hello@proworx.hu)

**Proworx Digital** welcomes your questions and feedback regarding this Data Privacy Notice.

If you believe we have not complied with this statement, please contact us using the details above.