

DroneCakes Limited Liability Company

DATA PROTECTION AND DATA MANAGEMENT INFORMER

1. Purpose and scope of the Notice

1.1 The purpose of this Notice is to record the data protection and data management principles applied by DroneCakes Limited Liability Company, as well as the Data Controller's obligations related to the rights of data subjects.

1.2 This Information Sheet is Personal data provided by Users/Customers contains the principles of treatment.

1.3 When developing its informative provisions, the company took into account in particular the provisions of Regulation 2016/679 of the European Parliament and of the Council (hereinafter: General Data Protection Regulation or GDPR), CXII of 2011 on the right to informational self-determination and freedom of information. Act (hereinafter: Infotv.), Act V of 2013 on the Civil Code (hereinafter: Ptk.), and Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising. the provisions of the Act (hereinafter: Grtv.).

1.4 The provisions of the Rules must be applied to natural persons in a contractual relationship with DroneCakes Kft., to the extent stipulated in the contract concluded with them and in the confidentiality statement, and it must be ensured that the persons concerned are familiar with the Rules to the extent necessary.

1.5 The data management policy is available from the following page:

<https://dronecakes.com>

The paper-based information is available at the office of DroneCakes Kft.: Budapest III. district Pomázi út 11.

1.6 Amendments to the prospectus take effect upon publication at the above address.

1.7 Contact details of the Data Controller:

Name: DroneCakes Kft.

Headquarters: 1037 Budapest, Pomázi út 11.

Email: info@dronecakes.hu

Contact details of the data protection officer:

Name: Krisztián Gyarmati

E-mail: krisztian.gyarmati@loricatus.hu

2. Definitions

2.1 Data management: any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as collection, recording, organization, segmentation, storage, transformation or change, query, insight, use, communication, transmission, distribution or otherwise by making it available, coordinating or connecting, limiting, deleting or destroying.

2.2 Data controller: the natural or legal person, public authority, agency or any other body that determines the purposes and means of processing personal data independently or together with others; if the purposes and means of data management are determined by EU or member state law, the data controller or the special aspects regarding the designation of the data controller may also be determined by EU or member state law.

In the case of the Services referred to in this Notice, the following shall be considered Data Controllers:

DroneCakes Kft. (headquarters: 1037 Budapest, Pomázi út 11.; registered by the Chamber of Commerce of the Capital Court, company registration number: 01-09-397175; tax number: HU27767199) hereinafter: Data Manager

The Data Controller is a company registered in Hungary.

2.3 Personal information or data: any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person can be identified.

2.4 Data processor: the service provider who processes personal data on behalf of the Data Controller.

For the services referred to in this Information, Data Processor(s) may:

a.) **Vercel Inc.** <https://vercel.com/legal/privacy-policy> 340 S Lemon Ave #4133 Walnut, CA 91789 privacy@vercel.com

c.) **Google Cloud EMEA Limited:** <https://policies.google.com/privacy?hl=en-US>

Velasco Clanwilliam Place Dublin 2 Ireland

d.) <https://biztositas.dronecakes.com/> in the case of a sub-site, data management and processing **exclusively Balázs Takács Independent Insurance Auction, Biztisát Navigátor Zrt.**

is carried out by a colleague

email: takacs.balazs@biztositasnavi.hu.

2.5 Website(s): website(s) operated by the Data Controller:

www.dronecakes.com

<https://www.facebook.com/groups/dronecakes>

<https://www.facebook.com/drncks>

<https://www.instagram.com/drncks/>

<https://www.linkedin.com/showcase/dronecakes-com/about/>

<https://twitter.com/dronecakes>

2.6 Service(s): operated by the Data Controller and provided by the Data Controller services that are available on the Websites.

2.7 User: the natural or legal person who registers for the Services, and this provides personal data in the context of

2.8 External service provider: third-party service partners used by the Data Controller in connection with the operation of individual Websites or the provision of services available through the Websites - either directly or indirectly - to whom Personal Data is or may be transmitted in order to provide their services, or who Personal data may be forwarded to the data controller. External service providers are also those service providers that are not in cooperation with the Data Controller, but by accessing the websites of the Services, they collect data about the Users, which, either independently or combined with other data, may be suitable for identifying the User.

2.9 Information: this data management information of the Data Controller.

2.10 Recipient: the natural or legal person, public authority, agency or any other body to whom the personal data is communicated, regardless of whether it is a third party. Those public bodies that, within the framework of an individual investigation, are

they can access personal data in accordance with EU or member state law, they are not considered recipients; the handling of said data by these public authorities must comply with the applicable data protection rules in accordance with the purposes of the data management.

2.11 The consent of the data subject: the voluntary, specific and clear declaration of the will of the data subject based on adequate information, with which the data subject indicates by means of a statement or an act clearly expressing the confirmation that he gives his consent to the processing of his personal data.

2.12 Data protection incident: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise handled.

3. Principles for the management of Personal Data

3.1 Personal data

- it must be handled legally and fairly, as well as in a transparent manner for the data subject ("legality, fair procedure and transparency")
- it should only be collected for specific, clear and legitimate purposes, and it should not be handled in a way that is incompatible with these purposes; in accordance with Article 89 (1) of Regulation 2016/679 of the European Parliament and of the Council, further data processing for the purpose of archiving in the public interest, for scientific and historical research purposes or for statistical purposes is not considered incompatible with the original purpose ("purpose limitation").
- they must be appropriate and relevant from the point of view of the purposes of data management, and must be limited to what is necessary ("data economy")
- they must be accurate and, if necessary, up-to-date; all reasonable measures must be taken to promptly delete or correct personal data that is inaccurate for the purposes of data management ("accuracy")
- it must be stored in a form that allows the identification of the data subjects only for the time necessary to achieve the goals of personal data management; personal data may be stored for a longer period only if the personal data will be processed in accordance with Article 89 (1) of Regulation 2016/679 of the European Parliament and of the Council for archiving purposes in the public interest, for scientific and historical research purposes or for statistical purposes row, taking into account the implementation of the appropriate technical and organizational measures prescribed in this regulation to protect the rights and freedoms of the data subjects ("limited storage capacity")

- must be handled in such a way that adequate security of personal data is ensured through the application of appropriate technical or organizational measures, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage of data ("integrity and confidentiality").
- The data controller is responsible for compliance with the above, and must also be able to e to prove compliance ("accountability").

4. Types of data management

4.1. DroneCakes Kft. is of administrative or record-keeping type (for the creation of a data file directed) performs data management.

4.2 Administrative type data management is closely related to the processing of the case, its basic purpose is to provide the data necessary for the conduct of the given case, the identification of the actors of the procedure and the completion of the case. During administrative-type data management, personal data are only included in the documents of the given case and in administrative aids, they can only be processed until the underlying document is disposed of.

4.3 The record-type data management creates a structured data file from the types of personal data collected on the basis of predefined criteria, ensuring the retrievability of the data based on various characteristics during the period of data management, and in the case of automated records, the possibility of querying (e.g. contract register). In this case, the processing of the data collected in connection with individual cases is separated from the basic procedure, the duration of the data processing is determined by the law authorizing the processing of the data, or by the consent of the data subject.

5. Purpose of data management

5.1 The scope of managed data and the purpose of data management are as follows:

Personal data	Purpose of data management
Surname and first name	THE necessary for contacting, the placing an order and issuing a regular invoice.

E-mail address	Maintaining contact, presenting marketing materials, promotions, events, web events.
Phone number	Contacting, invoicing, or more effective with delivery coordination of related issues. Also presentation of marketing materials, promotions, events, and events. web
Date of registration	Execution of a technical operation.
IP address at the time of registration	Execution of a technical operation.

The purpose of personal data may also be:

- Facilitating the customization of services used by the user, use of convenience functions.
- creating statistics and analyses
- managing individual user inquiries
- inquiries for direct business acquisition or marketing purposes
- in individual cases, the organization and conduct of prize games, the winners notification, securing the prize for them
- when responding to the User's requests and questions
- during the fulfillment of the contract concluded with the User or concerning the User or during the conduct of contractual negotiations with the User or concerning the User
- records – thus records containing the User's personal data
 - in case of preparation
- during contact with the User by e-mail - or depending on the User's permission - in other ways, in connection with the provision of data and information of interest to the User, such as information about the products and services of our Company or others
- the basic interests of the User or the health and safety of other persons
 - to protect your well-being

- in order to comply with the provisions of legislation, judicial decisions or other legal obligations
- During the enforcement of other legitimate interests of DroneCakes Kft., unless such data processing would result in a violation of the User's rights or freedoms
- in any other case authorized by the User
- making additional offers, in the form of telephone and e-mail, by a contractual third party. Internet to support telemarketing or other sales activities contact information provided on platforms or in person can be used.

Neither the username nor the e-mail address needs to be personal contain data.

5.2 Scope of stakeholders: All natural or legal persons registered/customer/advertiser/ previously attended training at DroneCakes Kft.

5.3 Duration of data management, deadline for deletion of data: immediately upon cancellation of registration. Except in the case of accounting documents, as this data must be kept for 8 years based on § 169 (2) of Act C of 2000 on accounting.

"Accounting documents directly and indirectly supporting the bookkeeping (including ledger accounts, analytical and detailed records) must be kept in legible form for at least 8 years, in a way that can be retrieved based on the reference of the accounting records."

5.4 The person of the possible data controllers entitled to access the data, the recipients of the personal data: The personal data may be handled by the employees of the data controller, if absolutely necessary for the performance of their tasks, in compliance with the above principles. In special cases, the involvement of other experts is justified, in which case a confidentiality clause is included in the document on case assignments to protect data.

5.5 Description of the rights of data subjects related to data management:

- The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing,
- you can object to the processing of such personal data, as well as
- the data subject has the right to data portability and to withdraw consent at any time.

5.6 The data subject can initiate access to personal data, their deletion, modification, or restriction of processing, portability of data, objection to data processing in the following ways:

- by post to DroneCakes Limited Liability Company
1037 Budapest, Pomázi út 11.
- via email to info@dronecakes.com by e-mail,

5.7 Legal basis for data management: consent of the data subject, Article 6 (1) point a) of Regulation 2016/679 of the European Parliament and of the Council, Infotv. Paragraph (1) of § 5, and CVIII of 2001 on certain issues of electronic commerce services and services related to the information society. Act (hereinafter: Elker Law) 13/A. Based on § (3):

"For the purpose of providing the service, the service provider may process the personal data that is technically absolutely necessary for the provision of the service. If the other conditions are the same, the service provider must choose and in any case operate the tools used in the provision of services related to the information society in such a way that personal data is only processed if this is absolutely necessary for the provision of the service and the fulfillment of other objectives defined in this law necessary, but in this case also only to the extent and for the necessary time."

6 The data processors used

1., Company name: Billingo Technologies Zrt.

Headquarters: 1133 Budapest, Árbóc utca 6. I. floor

Company registration number:

01-10-140802, registered by the Commercial Court of the Capital City Court

Tax number: 27926309-2-41

Community tax number: HU27926309

website: <https://www.billingo.hu/>

email: hello@billingo.hu

2nd, Cooltix Global

The name of the Service Provider

Cooltix GmbH

Registered office and postal address	Vorgartenstraße 204, 1020 Wien
Tax number	ATU69759638
Registration number	FN 434585 x
E-mail address	ticket@cooltix.com
Website	cooltix.com

as well as:

Cooltix Hungary

The name of the Service Provider	Cooltix Kft.
Registered office and postal address	1084 Budapest, József utca 3. 3/27
Registration authority	Capital Court as Company Court
Registration number	01-09-286080
Tax number	25730223-2-42
E-mail address	ticket@cooltix.hu
Website	cooltix.hu

6.2.1 The fact of the data management, the scope of the managed data: Billing name, billing address, e-mail address, tax number/tax identification number, bank card number.

6.2.2 Scope of stakeholders: All stakeholders requesting online shopping and services.

6.2.3 Purpose of data management: Online payment, confirmation of transactions and checking of abuses for the protection of users.

6.2.4 Duration of data management, deadline for data deletion: Online payment and during the subscription period.

6.2.5 Legal basis for data processing: User's consent, Infotv. Section 5 (1), Article 6 (1) point a) of Regulation 2016/679 of the European Parliament and of the Council, and CVIII of 2001 on certain issues of electronic commerce services and services related to the information society. Act 13/A. (3) of §

6.3 Hosting provider

6.3.1 Activity performed by data processor: Storage service

6.3.2 Name and contact information of data processor:

Name: Microsoft Ireland Operations Limited

registered office: 70 Sir Rogerson's Quay, Dublin 2, Ireland

website: www.microsoftstore.com

Phone: +1 800 710 200

Company registration number: 256796

Community tax number: IE8256796U

6.3.3 The fact of the data management, the scope of the managed data: All provided by the data subject personal data.

6.3.4 Scope of stakeholders: All stakeholders in a contractual relationship with DroneCakes Kft., as well as natural and legal persons connected via electronic correspondence.

6.3.5 Purpose of data management: Making the services available, operating them properly, and ensuring case management and case management.

6.3.6 Duration of data management, deadline for data deletion: Data management lasts until the termination of the agreement between the data controller and the storage provider, or until the deletion request addressed to the storage provider by the data subject.

6.3.7 Legal basis for data processing: User's consent, Infotv. Section 5 (1), Article 6 (1) point a) of Regulation 2016/679 of the European Parliament and of the Council, and CVIII of 2001 on certain issues of electronic commerce services and services related to the information society. Act 13/A. (3) of §

7. Management of cookies

7.1 A cookie is a small file that contains only letters and numbers and that can be stored on a user's computer, mobile phone or other device that provides Internet access. A cookie is a packet of information that the given web server sends to the browser, and then the browser sends it back to the server for every request directed to the server. Cookies are "passive", i.e. they do not contain executable files, viruses or spyware, and they do not access the data of the user's hard drive.

7.2 According to the provisions of Regulation 2016/679 of the European Parliament and of the Council, natural persons can be associated with the online identifiers provided by the devices, applications, tools and protocols they use, for example IP-

addresses and cookie identifiers, as well as other identifiers such as radio frequency identification tags. This may result in traces that, combined with unique identifiers and other information received by the servers, can be used to create a natural personal profile and identify that person. Therefore, the Data Manager uses cookies with the express consent of the User. The User can delete the cookie from his computer or set his browser to prohibit the use of cookies. By prohibiting the use of cookies, the User acknowledges that the operation of the given page is incomplete without cookies.

7.3 When providing personalized services, the Data Managers manage the following personal data using cookies: demographic data, interest information, habits, preferences (based on browsing history).

7.4 Technically recorded data during the operation of the systems: the data of the User's logged-in computer, which are generated during the use of the Service, and which are recorded by the Data Managers' system as an automatic result of the technical processes. The automatically recorded data is automatically logged by the system upon entry and exit without any special declaration or action by the User.

8 Newsletter

8.1 XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities. Pursuant to § 6 of the Act, the User may give prior and express consent to contact the Service Provider with its advertising offers and other mailings at the contact details provided during registration.

8.2 Furthermore, with the provisions of this information in mind, the User may consent to the Service Provider managing his personal data necessary for sending advertising offers.

8.3 The Service Provider does not send unsolicited advertising messages, and the User may unsubscribe from the sending of offers free of charge without limitation or justification. In this case, the Service Provider deletes all personal data necessary for sending advertising messages from its records and does not contact the User with further advertising offers.

Users can unsubscribe from advertisements by clicking on the link in the message.

8.4 The scope of the data managed by the data controller and the purpose of the data management during the procedure and activity defined in this point 8:

Personal data	Purpose of data management
Name, e-mail address.	Identification, subscription to the newsletter is possible item.
Date of subscription	Execution of a technical operation.
IP address at the time of registration	Execution of a technical operation.

8.5 Scope of stakeholders: All stakeholders who subscribe to the newsletter.

8.6 Purpose of data management: sending electronic messages containing advertising (e-mail, sms, push message) to the person concerned, providing information about current information, services, promotions, new functions, etc.

8.7 Duration of data management, deadline for deletion of data: data management lasts until withdrawal of the consent statement, i.e. until unsubscription.

8.8 Person of possible data controllers entitled to access the data, recipients of personal data: Personal data may be handled by the data controller's employees, in compliance with the above principles.

8.9 Description of the rights of data subjects related to data management:

- The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing,
- you can object to the processing of such personal data, as well as
- the data subject has the right to data portability and to withdraw consent at any time.

8.10. The data subject can initiate access to personal data, their deletion, modification or limitation of processing, portability of data, objection to data processing in the following ways:

- by post to DroneCakes Limited Liability Company 1037 Budapest, Pomázi út 11.

- by e-mail at the e-mail address info@dronecakes.com,

8.11 The person concerned can unsubscribe from the newsletter at any time, free of charge.

8.12 Legal basis for data management: the consent of the data subject, Article 6 (1) point a) of Regulation 2016/679 of the European Parliament and of the Council, that Infotv. Paragraph (1) of Section 5 and XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities. Section 6 (5) of the Act:

"The advertiser, the advertising service provider, or the publisher of the advertisement - within the scope specified in the consent - keeps a record of the personal data of the persons who have given their consent. The data recorded in this register - relating to the recipient of the advertisement - can only be handled in accordance with the consent statement, until it is revoked, and can only be transferred to third parties with the prior consent of the person concerned."

9. Related to running an online store/using advertising services data handling

9.1. Application of Google Analytics

the. This website uses Google Analytics, which is provided by Google Inc. ("Google") web analytics service. Google Analytics uses so-called "cookies", text files that are saved on your computer, thus facilitating the analysis of the use of the website visited by the User.

b. The information created by cookies related to the website used by the User is usually sent to and stored on one of Google's servers in the USA. By activating IP anonymization on the website, Google shortens the User's IP address beforehand within the member states of the European Union or in other states that are parties to the Agreement on the European Economic Area.

c. The full IP address is transmitted to a Google server in the USA and shortened there only in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how the User used the website, to prepare reports related to website activity for the website operator, and to provide additional services related to website and Internet use.

d. Within the framework of Google Analytics, the IP address transmitted by the User's browser is not combined with other Google data. The user can prevent the storage of cookies by setting their browser accordingly, but please note that in this case, this website may not have all

function will be fully usable. You can also prevent Google from collecting and processing the User's website usage data (including IP address) through cookies by downloading and installing the browser plugin available at the following link. <https://tools.google.com/dlpage/gaoptout?hl=en>

9.2 Advertising Terms

dronecakes.com is considered an advertising platform, where the advertiser can provide data based on his own decision and express consent. The controller bears no responsibility for the use of publicly shared data by third parties.

When DroneCakes Kft. acts as a data processor on behalf of EU advertisers and business partners, it guarantees compliance with the specific requirements for data processors.

If we entrust a third party to act as a data processor on our behalf, we will ensure that we apply appropriate conditions in order to comply with the GDPR and protect personal data. And if we act as a data processor on behalf of an advertiser, we use the advertiser's data controller legal basis for the relevant data

for handling by us.

10. Complaint handling

10.1 Scope of data handled during complaint handling and purpose of data handling:

Personal data	Purpose of data management
Surname and first name	Identification, contact.
E-mail address	Keeping in touch.
Phone number	Keeping in touch.

10.2 Scope of the affected parties: All natural or legal persons who order/use the dronecakes.com website and complain about quality issues.

10.3 Duration of data management, deadline for deletion of data: Copies of the minutes, transcripts and the response to the objection are provided in the CLV of 1997 on consumer protection. Act 17/A. § (7) must be kept for 5 years.

10.4 The person of the possible data controllers entitled to access the data, the recipients of the personal data:
The personal data can be handled by the employees of the data controller, in compliance with the above principles.

10.5 Description of the rights of data subjects related to data management:

- The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing,
- you can object to the processing of such personal data, as well as
- the data subject has the right to data portability and to withdraw consent at any time.

10.6 The data subject can initiate access to personal data, its deletion, modification or restriction of processing, portability of data, objection to data processing in the following ways:

- by post to DroneCakes Limited Liability Company 1037 Budapest, Pomázi út 11.
- by email at info@dronecakes.com.

10.7 Legal basis for data management: consent of the data subject, Article 6 (1) point a) of Regulation 2016/679 of the European Parliament and of the Council, Infotv. Paragraph (1) of Section 5 and CLV of 1997 on consumer protection. Act 17/A. (7) of §

11 Social sites

11.1 The scope of the processed data: all personal data provided by the data subjects in connection with the expressions on social media by DroneCakes Kft., in particular Facebook/Google+/Twitter/Pinterest/Youtube/Instagram, etc. their registered name on social networking sites and the users' public profile picture.

11.2 The are affected scope: All Facebook/ affected, who registered the Google+/Twitter/Pinterest/Youtube/Instagram etc. on social networking sites and "liked" the website.

11.3 Purpose of data collection: To promote the sharing or "liking" of certain content elements, products, promotions or the website itself on social networks.

11.4 The duration of data management, the deadline for data deletion, the identity of possible data managers entitled to access the data and the rights of the data subjects related to data management: About the source of the data, its management, and the method of transfer, and the legal basis can be found on the given social media site. Data management a

is implemented on social media sites, so the duration and method of data management, as well as the options for deleting and modifying data, are governed by the regulations of the given social media site.

11.5 The legal basis for data management: the voluntary consent of the data subject to the management of his personal data on social networking sites.

12 Customer relations and other data management

12.1 If a question arises when using our data controller services, or if the data subject has a problem, you can contact the data controller using the methods provided on the website (phone, email, social media sites, etc.).

12.2 The Data Controller processes received e-mails, messages, phone calls, Facebook messages, etc. data provided, together with the name and e-mail address of the interested party, as well as other voluntarily provided personal data, will be deleted no later than 1 year from the date of data communication.

12.3 Data management not listed in this information sheet will be provided at the time of data collection information.

12.4 The Service Provider is obliged to provide information, communicate and hand over data, or make documents available in the event of an exceptional official request, or in the case of requests from other bodies based on the authorization of the law.

12.5 In these cases, the Service Provider will only provide personal data to the requester - if he has specified the exact purpose and the scope of the data - to the extent and to the extent that is absolutely necessary to achieve the purpose of the request.

13 Rights of data subjects

13.1 Right of Access

The user has the right to receive feedback from the data controller as to whether his personal data is being processed, and if such data is being processed, he is entitled to access the personal data and the information listed in the regulation.

If the data controller manages a large amount of information regarding the data subject, it may ask the data subject to specify which information or which data processing activities his/her request applies to, prior to the disclosure of the information.

13.2 Right to Rectification

The user has the right to have inaccurate personal data corrected without undue delay upon request by the data controller. Considering that

purpose of data management, the User is entitled to request incomplete personal data - among other things, its addition by means of a supplementary declaration.

13.3 Right to Erasure

The User has the right to request that the data manager delete personal data concerning him without undue delay, and the data manager is obliged to delete personal data concerning the User without undue delay under certain conditions.

13.4 Right to be forgotten

If the data controller has disclosed the personal data and is obliged to delete it, taking into account the available technology and the costs of the implementation, it will take the reasonably expected steps - including technical measures - in order to inform the data controllers handling the data that the User has requested the personal data in question the deletion of links or duplicates of these personal data.

13.5 Right to restriction of data processing

The user has the right to request that the data controller limit data processing if one of the following conditions is met:

- The user disputes the accuracy of the personal data, in which case the limitation applies to the period that allows the data controller to check the accuracy of the personal data;
- the data management is illegal and the User opposes the deletion of the data and instead requests the restriction of their use;
- the data controller no longer needs the personal data for the purpose of data management, but User requires them to present, enforce or defend legal claims;
- User objected to data management; in this case, the restriction applies to the period until it is established whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the User.

13.6 Right to data portability

The user has the right to receive the personal data he has provided to a data controller in a segmented, widely used, machine-readable format, and he is also entitled to transmit this data to another data controller without being hindered by the data controller whose provided personal data to you.

13.7 Right to Object

The user has the right to object to the processing of his personal data at any time for reasons related to his own situation, including profiling based on the aforementioned provisions.

13.8 Objection in case of direct business acquisition

If personal data is processed for the purpose of direct business acquisition, the User has the right to object at any time to the processing of his/her personal data for this purpose, including profiling, if it is related to direct business acquisition. If the User objects to the processing of personal data for the purpose of direct business acquisition, then the personal data may no longer be processed for this purpose.

13.9. Automated decision-making in individual cases, including profiling

The user has the right not to be covered by a decision based solely on automated data management, including profiling, which would have legal effects on him or affect him to a similar extent. The previous paragraph does not apply if the decision:

- Necessary in order to conclude or fulfill the contract between the user and the data controller;
- its implementation is made possible by the EU or Member State law applicable to the data controller, which also establishes appropriate measures for the protection of the User's rights and freedoms, as well as his legitimate interests; obsession
- It is based on the express consent of the user.

14 **Deadline for action**

The data controller shall inform the User of the measures taken following the above requests without undue delay, but in any case within one month of the receipt of the request. If necessary, taking into account the request

complexity and the number of applications, this deadline can be extended by another two months. The data controller shall inform the User of the extension of the deadline, indicating the reasons for the delay, within one month of receiving the request.

If the data controller does not take measures following the User's request, it shall inform the User without delay, but at the latest within one month of the receipt of the request, of the reasons for the lack of action, and that the User
you can file a complaint with a supervisory authority and exercise your right to judicial redress.

15 Security of data management

15.1 The data controller and the data processor implement appropriate technical and organizational measures, taking into account the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of data management, as well as the variable probability and severity of the risk to the rights and freedoms of natural persons. in order to guarantee a level of data security appropriate to the degree of risk, including, among others, where appropriate:

- pseudonymization and encryption of personal data;
- ensuring the continuous confidentiality, integrity, availability and resilience of the systems and services used to manage personal data;
- in the event of a physical or technical incident, the ability to restore access to personal data and the availability of data in a timely manner set;
- a procedure for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures taken to guarantee the security of data management.

15.2 In order to ensure the security of personal data handled on a paper basis, the following measures applied by the Data Controller:

- the data can only be seen by those authorized to do so, no one else can access them, they cannot be disclosed to others;
- documents with well-sealable, dry, fire protection and asset protection equipment places it in an equipped room;
- documents in continuous active processing can only be accessed by those in charge;

- during the day, the employee of the Data Controller performing data management can only leave the room where data management is taking place by blocking the data carriers entrusted to him or by closing the office;
- if personal data managed on paper are digitized, the security rules applicable to digitally stored documents shall be applied
Data controller

15.3 In order to ensure the security of personal data stored on the computer or network, the Data Controller applies the following measures and guarantee elements:

- the computers used during data management are or are the property of the company over which the company has the same right as ownership;
- the data on the computer can only be accessed with a valid, personal, identifiable authorization - at least with a username and password - the Data Controller regularly ensures that passwords are changed;
- all computer records dealing with data are traceably logged costs;
- it is only suitable for data stored on the network server machine (hereinafter: server). authorized and only authorized persons can access it;
- if the purpose of data management has been achieved and the deadline for data management has expired, the file containing the data will be irretrievably deleted and the data cannot be recovered;
- in order to ensure the security of the data stored on the network, the company avoids data loss by continuous mirroring on the server;
- performs a daily backup of the active data of the databases containing personal data, the backup applies to the entire data file of the central server and is carried out on a magnetic data carrier;
- the magnetic data carrier storing the saved data is designed for this purpose stored in a fire-proof place and manner in an armored box;
- continuously takes care of virus protection on the network handling personal data;
- with the available computer technology tools and their application prevents unauthorized persons from accessing the network.

16 Informing the data subject about the data protection incident

If the data protection incident likely entails a high risk for the rights and freedoms of natural persons, the data controller shall inform the data subject of the data protection incident without undue delay.

In the information provided to the data subject, the nature of the data protection incident must be clearly and comprehensibly described, and the name and contact information of the data protection officer or other contact person providing additional information must be provided; the likely consequences of the data protection incident must be described; the measures taken or planned by the data controller to remedy the data protection incident must be described, including, where applicable, measures aimed at mitigating any adverse consequences resulting from the data protection incident.

The data subject does not need to be informed if any of the following conditions are met:

- the data controller implemented appropriate technical and organizational protection measures, and these measures with respect to the data affected by the data protection incident have been applied, in particular measures, such as the use of encryption, which render the data unintelligible to persons not authorized to access the personal data;
- after the data protection incident, the data controller has taken additional measures to ensure that the high risk to the rights and freedoms of the data subject is unlikely to materialize in the future;
- providing information would require a disproportionate effort. In such cases, the data subjects must be informed through publicly published information, or a similar measure must be taken that ensures similarly effective information to the data subjects. If the data controller has not yet notified the data subject of the data protection incident, the supervisory authority, after considering whether the data protection incident is likely to involve a high risk, may order the data subject to be informed.

17 Notification of the data protection incident to the authority

The data controller shall report the data protection incident without undue delay and, if possible, no later than 72 hours after becoming aware of the data protection incident to the competent supervisory authority pursuant to Article 55 of Regulation 2016/679 of the European Parliament and of the Council, unless the data protection incident probably does not pose a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it must be accompanied by a document justifying the delay

reasons too.

18 Complaint

The National Data Protection and
Freedom of information You can live with an authority:

National Data Protection and Freedom of Information Authority

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

postal address: 1530 Budapest, Pf.: 5.

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

In the event of a violation of his rights, the data subject may appeal to the court (at the choice of the data subject, competent according to the seat of the defendant or the residence of the data subject) against the data controller.

19 Other

The Data Controller reserves the right to unilaterally amend its data protection policy and the content of these Regulations in the event of a change in the services it provides, as well as in accordance with the legal provisions in force at all times, as well as professional resolutions. After the amendment enters into force, the affected user accepts the contents of the amended Regulations by using the service (email interface, subscribing to the newsletter) and acting accordingly.

If the amendment affects the handling of personal data provided by the person concerned, the user will be informed of the changes in the form of an e-mail information letter. If, as a result of the amendment of the declaration, the essential conditions of data management also change, the Company separately requests the consent of the person concerned for the amendment.

Budapest, 2023. 10.19.

DroneCakes Kft.