



PRIVACY NOTICE

Effective: August 24, 2026

Version Number: 1.1

1. Introduction

This Notice contains information regarding the data processing activities of Green Energy Investhor Zrt. (headquarters: 1026 Budapest, Pasaréti út 122-124) and the companies in which it holds a majority stake (hereinafter: “Subsidiaries,” Green Energy Investhor Zrt. and its Subsidiaries hereinafter referred to as “Data Controller”) regarding their data processing activities. The Data Controller’s objective is to ensure that natural persons (hereinafter referred to as “Data Subjects”) whose data is processed by the Data Controller understand the purpose and conditions of data processing, the associated risks and safeguards, as well as the rights to which the Data Subject is entitled, even before the data is processed and—if the legal basis for data processing is the Data Subject’s consent—before consent is given.

2. Definitions

“Data processing”: any operation or set of operations performed on personal data, including, in particular, collection, recording, organization, storage, use, disclosure, erasure, or destruction.

“Personal data”: any information relating to an identified or identifiable natural person.

“Data Subject”: any natural person whose personal data is processed by the Data Controller.

“Data Controller”: Green Energy Investhor Zrt. and its majority-owned Subsidiaries.

“Data Processor”: a natural or legal person who processes personal data on behalf of the Data Controller.

“Partner”: a legal entity that has a contractual relationship with the Data Controller or that is engaged in consultations, negotiations, or communications with the Data Controller for the purpose of establishing a contractual relationship.

“Third Party”: a natural or legal person who is not the Data Subject, the Data Controller, or the Data Processor.

“M&A transaction”: a process aimed at acquiring a stake in or the assets of a legal entity.

3. Details of the Data Controller

Full name: Green Energy Investhor Zártkörűen Működő Részvénytársaság

Abbreviated name: **Green Energy Investhor Zrt.**

Registered office: 1026 Budapest, Pasaréti út 122–124.

Company registration number: 01 10 143336

Tax ID: 29305603-2-41

Website: www.gethor.hu

Email: info@gethor.hu

If the Subsidiary is the Data Controller, it shall inform the Data Subject of its data processing activities in the relevant contract or upon request.

4. Data Processing Principles

The Data Controller acts in accordance with the principles set forth in Article 5 of the GDPR: lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality, and accountability.

The Data Controller ensures the security of personal data through appropriate technical and organizational measures, in particular against unauthorized access, alteration, disclosure, erasure, or destruction.

5. Brief Description of Data Processing Activities

The Data Controller does not engage in data processing activities involving a large number of natural persons, given that, in the course of its business activities, it does not sell goods or services to natural persons on a commercial basis. The most extensive data processing activity concerns employees. In addition, the Data Controller has contractual relationships with several private individuals in connection with real estate transactions (e.g., renting or purchasing real estate, or entering into agreements granting rights to build on the property or providing for compensation in connection with real estate), and processes personal data related to these contracts. The Data Controller also processes the data of natural persons acting on behalf of or in the interest of legal entities with which it has a contractual relationship, to the extent necessary for the performance of the relevant contracts . In

connection with establishing and maintaining contact, as well as in other contexts not related to a contractual relationship, the Data Controller also processes the data of natural persons or natural persons acting on behalf of legal entities with whom it comes into contact in connection with an administrative legal relationship or other tasks or procedures. The types of data processing carried out by the Data Controller, the scope of the data processed, the legal basis and purpose of the data processing, the retention period for the personal data processed, and the recipients of any data transfers are described in detail in the tables in the following section. For visitors to the Data Controller's website, certain metadata regarding visitors is processed through the use of cookies.

6. Types and Characteristics of Data Processing

6.1. Data Processing related to employment

Scope of Processed Data	Legal basis(es) for data processing	Purpose(s) of data processing	Duration of data processing	Method, legal basis, and recipients of any data transfers
Regarding employees: - Identifying information: name, birth name, mother's name, place and date of birth; - contact information: address, place of residence, phone number, email address; - personal identification and official data: tax identification number, social security number, national ID card number, passport number, driver's license number; - employment-related data: job title, organizational unit, salary, wage supplements, working hours and leave data, attendance records, bank account number;	GDPR Article 6(1)(b) — performance of a contract; GDPR Article 6(1)(c) — compliance with a legal obligation Section 10 of the Labor Code Section 11/A of the Labor Code Section 169 of Act C of 2000 on Accounting Section 99/A of Act LXXXI of 1997 on Social	Performance of employment obligations; Fulfillment of tax and social security obligations related to the employment relationship; Assessment/knowledge of employee competencies.	8 years following the termination of the employment relationship; Data related to social security coverage: for five years after the insured person reaches the applicable	The company performing payroll processing, acting as a Data Processor; The company providing IT support; The Partners, as data recipients; In the case of an M&A transaction, the potential buyer

• social security and tax data; • data regarding education and professional qualifications: education, professional qualifications, language skills, resume, previous work experience; • contact information in case of an emergency; • data regarding the employee's family members that are required by law or necessary for the exercise of rights related to the employment relationship, including, in particular, the names and dates of birth of children, their Social Security numbers, and the spouse's data for claiming family tax credits, additional leave, or other benefits; • data related to the use of electronic systems: use of company email, access logs, and IT access rights.	Security Pensions		retirement age.	
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6.2. Data Processing related to real estate transactions

Scope of Processed Data	Legal basis(es) for data processing	Purpose(s) of data processing	Duration of data processing	Method, legal basis, and recipients of any data transfers
Data of property owners • Data listed in the real estate registry • Details of the contract pertaining to the	Article 6(1)(b) of the GDPR — performance of a contract; Section 169 of Act C of 2000 on Accounting	Performance of a contract; Retention of documents in accordance	8 years following the termination of the contract; Data related to social security status: for insured	As a Data Processor: the company performing accounting and auditing activities;

property, including, in particular, the legal basis of the contract, the consideration, the term of the contract, and contact information		e with the Accounting Act	persons, for five years reaching the retirement age specified at.	the company providing IT support; The Partners as data recipients; in the event of an M&A transaction, the potential buyer
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6.3. Data processing concerning persons acting on behalf of Contractual Partners

Scope of Processed Data	Legal basis(es) for data processing	Purpose(s) of data processing	Duration of data processing	Method, legal basis, and recipients of any data transfers
Persons acting on behalf of or in the interest of the Partners - Name - contact information - Information listed in the commercial register - data related to the performance of the contract (certificates of performance, minutes, cooperation agreements, etc.) - in the case of camera surveillance at a construction site, the Data Subject's image and information	Article 6(1)(f) of the GDPR—the Data Controller's legitimate interests; Section 169 of Act C of 2000 on Accounting	Performance of a contract; Retention of documents in accordance with the Accounting Act	8 years following the termination of the contract In the case of an M&A transaction involving the Data Controller's intention to acquire a company, until withdrawal from the transaction, for 8 years from the date the transaction is completed or falls through	As a Data Processor: a company performing accounting and auditing activities; a company providing IT support; The Partners, as data recipients; in the case of an M&A transaction, the potential buyer

regarding their presence and movements on the worksite • If, in the context of an M&A transaction, the Data Controller is the potential buyer, the Data Controller processes the data of the employees of the company intended to be acquired as specified in Section 4.1, as well as the shared data of other Data Subjects processed by the company intended to be acquired.				
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6.4. Data processing related to establishing and maintaining contact

Scope of Processed Data	Legal basis(es) for data processing	Purpose(s) of data processing	Duration of data processing	Method, legal basis, and recipients of any data transfers
Personal data processed in connection with establishing and maintaining contact, as well as in other contexts not related to a contractual relationship or the performance of a task (e.g., clients and Data Subjects in administrative proceedings, individuals)	Article 6(1)(f) of the GDPR — the Data Controller's legitimate interest.	Establishing and maintaining contact; asserting legal rights or claims in administrative legal relationships	8 years from the date of the initial contact; 8 years following the expiration of the operating license associated with the relevant permit (including any and all extensions thereof)	As a Data Processor: the company performing accounting and auditing activities; a company providing IT support; As data recipients, the Partners (e.g., the Partner)

inquiring as journalists): The Data Subject's • Name • contact information • data listed in the commercial register • data related to the legal relationship or the performance of a task (submissions by clients in administrative proceedings)				responsible for operating the power plant under the relevant license); in the case of an M&A transaction, the potential buyer
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6.5. Data Processing Related to Website Visits

Scope of Processed Data	Legal basis(es) for data processing	Purpose(s) of data processing	Duration of data processing	Method, legal basis, and recipients of any data transfers
• For visitors to the Data Controller's website, certain metadata regarding visitors is processed using cookies, depending on the cookie settings selected by the website visitor	Article 6(1)(f) of the GDPR — the Data Controller's legitimate interest.	IT purposes enabling the use of the website (functional cookies), as well as cookies designed to improve the user experience based on the cookie settings selected by the website	Duration of cookie use	As a Data Processor: the company providing IT support; As data recipients: the Partners; In the case of an M&A transaction, the potential buyer

		visitor (convenience cookies), and cookies used by certain Third Parties for direct marketing purposes (marketing cookies)		
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7. Data Processors

Accountant: Optima Tax Consulting Kft.

Headquarters: 8000 Székesfehérvár, Várkörút 2, 1st Floor, Unit 1

Company registration number: 07 09 009488

Tax ID: 13050232-2-07

Web Hosting Provider: SMBinfo Informatikai Korlátolt Felelősségű Társaság

Registered office: 1076 Budapest, Péterfy Sándor utca 7, half-floor, door 1

Tax ID: 25082788242

Company registration number: 01 09 431565

Law firm providing legal services: Dr. Hamar Law Firm

Registered office: 1118 Budapest, Kelenhegyi út 27.

Bar Association: Budapest Bar Association

Tax ID: 18517556-2-43

The Data Controller enters into a written data processing agreement with Data Processors in accordance with Article 28 of the GDPR, or the provisions regarding data processing are incorporated into the relevant agency, contract, or service agreement.

8. Data Transfer and Transfer of Data to Third Countries

Data transfers are made exclusively on the basis of law or to the extent necessary for the performance of a contract. In the case of data transfers to third countries, appropriate safeguards (SCCs) are applied.

9. Detailed Description of Data Subject Rights

The Data Subject has the right to:

- the right of access

- the right to rectification
- the right to erasure (right to be forgotten)
- the right to restriction of processing
- the right to data portability
- Right to object
- Filing a complaint with the NAIH or initiating legal proceedings before the Court

The Data Controller will comply with requests without undue delay and in any event within one month.

10. Technical and Organizational Measures

- SSL encryption
- Access rights management
- Regular backups
- Logging
- Physical security
- Internal data protection policy

11. Data Breach Response

In the event of a data breach, the Data Controller shall notify the supervisory authority within 72 hours if the breach is likely to pose a risk to the rights of the Data Subjects.

12. Accountability and record-keeping

The Data Controller maintains a record of processing activities in accordance with Article 30 of the GDPR and conducts regular data protection reviews. The Data Controller has not appointed a data protection officer in accordance with Article 37 of the GDPR.

13. Amendments to This Notice

The Data Controller reserves the right to amend this privacy notice. The current version is available on the website www.gethor.hu.