

## LANUS SOLAR PRIVACY POLICY

The Limited Liability Company Lanus Solar (registered office: 9653 Répcelak, Kossuth Lajos Street 1 Hungary; "Company") informs you about the processing of your personal data by the Company in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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) ("GDPR") as set out in Article 13.

### **1. Purpose and legal basis of data processing, scope of processed data, duration of data processing, persons with access to data, data transfers**

#### **1.1 Data processing related to direct marketing**

If you consent to it, during email direct marketing we process the following of your data:

Name, email address

In this case, the legal basis for data processing is your consent under Article 6(1)(a) of the GDPR. **Your consent to this can be withdrawn at any time free of charge by contacting [hello@lanussolar.com](mailto:hello@lanussolar.com) or by clicking the Unsubscribe button directly in the email.** The withdrawal of consent does not affect the lawfulness of processing based on consent before withdrawal.

We will process your data under this point until the withdrawal of your consent.

The designated employees of the Company and the data processor of the Company in direct marketing activities, X-Meditor Ltd. (registered office: 9023 Győr, Csaba Street 21.), have access to your data.

We do not transmit your data to other third parties, and there will be no automated decision-making regarding them.

#### **1.2 Contacting the Company**

If you contact the Company through the form on the Company's website, we process the following of your data:

Name, email address

In this case, the legal basis for data processing is your consent under Article 6(1)(a) of the GDPR. **Your consent to this can be withdrawn at any time free of charge by contacting [hello@lanussolar.com](mailto:hello@lanussolar.com).** The withdrawal of consent does not affect the lawfulness of processing based on consent before withdrawal.

We will process your data under this point until the withdrawal of your consent.

The designated employees of the Company and the data processor of the Company in direct marketing activities, X-Meditor Ltd. (registered office: 9023 Győr, Csaba Street 21.), have access to your data.

Please note that during the contact, we will process additional personal data beyond your name and email address to the extent necessary to answer your question, based on your consent above. Please provide only personal data that is essential for the purpose of the contact/question. Any non-essential data for the contact/question will be promptly deleted.

We do not transmit your data to other third parties, and there will be no automated decision-making regarding them.

## **2. Data Controller**

The controller of your personal data as defined in this notice is the Company.

## **3. Storage of data and description of technical and organizational measures for data security**

We store your personal data at the Company's registered office (9653 Répcelak, Kossuth Lajos Street 1).

The Data Controller takes all reasonably expected technical precautions to securely and access-restrictedly store personal data from third parties.

The IT security description of personal data storage, technical, and organizational measures for data security: firewall, password protection.

## **4. Your rights concerning the processing of personal data (data subject rights):**

**a) Right of access (Article 15 of the GDPR):** You are entitled to receive information as to whether the processing of your personal data is ongoing and, if so, to access your personal data and the information in this notice.

A copy of the personal data being processed will be made available to you upon request. For additional copies requested by you, we may charge a reasonable fee based on administrative costs. If you have submitted the request electronically, we will provide the information in a widely used electronic format unless you specify otherwise.

**b) Right to rectification (Article 16 of the GDPR):** You are entitled to request the correction of your inaccurate personal data without undue delay upon request, and you also have the right to request the completion of incomplete personal data.

**c) Right to erasure (Article 17 of the GDPR):** You are entitled to request the erasure of your personal data without undue delay, and we are obliged to erase your personal data without undue delay if, for example:

- Your personal data is no longer necessary for the purpose for which it was collected;

- You object to the processing, and there are no overriding legitimate grounds for the processing;
- Your personal data must be erased to comply with a legal obligation under the Union or Member State law.

The provisions in c) above do not apply where (i) processing is necessary for compliance with a legal obligation to which we are subject, or (ii) processing is necessary for the establishment, exercise, or defense of legal claims.

**d) Right to restriction of processing (Article 18 of the GDPR):** You are entitled to request the restriction of processing if, for example:

- You contest the accuracy of your personal data, in which case the restriction applies for the period enabling us to verify the accuracy of your personal data;
- We no longer need your personal data for the purposes of processing, but you require it for the establishment, exercise, or defense of legal claims; or
- You have objected to processing, pending the verification whether our legitimate grounds override yours.

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**e) Right to object (Article 21(2) of the GDPR):** You have the right to object at any time to the processing of your personal data for direct marketing purposes. In the case of objection, we will no longer process the personal data for direct marketing purposes.

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**f) Right to information about the above rights (Article 12 of the GDPR):** Without delay, but in any case within one month of the receipt of your request, we will inform you about the circumstances of the data processing in accordance with your requests in points a)-e) above. If necessary, taking into account the complexity and number of requests, this deadline may be extended by a further two months. You will be informed of the extension of the deadline within one month of receiving the request, with an indication of the reasons for the delay.

**g) Right to lodge a complaint (Article 77 of the GDPR):** You have the right to lodge a complaint with the supervisory authority, in particular in the Member State of your habitual residence, place of work, or the place of the alleged infringement if you consider that the processing of your personal data infringes the data protection laws. The complaint can be filed with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa Street 9-11; phone: +36 1 391 1400; fax: +36 1 391 1410; 1363 Budapest, Pf.: 9; [www.naih.hu](http://www.naih.hu); [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

**h) Right to judicial remedy (Article 79 of the GDPR):** You have the right to judicial remedy if you believe that the processing of your personal data that does not comply with the law has violated your rights. Proceedings against the Data Controllers must be initiated before the court of the Member State in which the Data Controllers have their place of business. Such proceedings may also be brought before the court of the Member State where you have your habitual residence.

**i) Right to data portability (Article 20 of the GDPR):** The right to data portability applies to you if the legal basis for processing is Article 6(1)(a) or (b) of the GDPR, i.e., your consent or the performance of a contract with you. In this case, you are entitled to receive your personal

data provided to us in a structured, commonly used, machine-readable format and have the right to transmit those data to another controller without hindrance from us. You also have the right to have the personal data transmitted directly from us to another controller, where technically feasible.

**5. You may request information about the processing of your personal data in the following ways and from the following person:**

Additional information about the processing of your personal data can be requested by mail (9653 Répcelak, Kossuth Lajos Street 1) or by email ([hello@lanussolar.com](mailto:hello@lanussolar.com)). Verbal information can also be provided upon request, and a protocol must be drawn up. If you request verbal information (e.g., by phone), you must verify your identity to the Company. In exercising the rights defined above, you should contact Ágnes Babos.

Dated: 9th October 2023.