

DATA PROTECTION POLICY**Extract**

PortfoLion Kockázati Tőkealap-kezelő Zrt (from now on: the Company) is committed to the development, operation, and application of a regulatory, enforcement, and control system which, following the criteria defined in the relevant legislation and its fundamental business interests, ensures the protection of business secrets, securities secrets and personal preservation and protection of data.

The personal data managed by the Company includes data necessary for personal identification and contact, data necessary for the provision of a given service, data generated and managed during the service provision, and data of communication between the person concerned and the Fund Manager - on any channel.

The framework for protecting personal data is determined by the **General Data Protection Regulation of the European Union**, the Act on Information Self-Determination and Freedom of Information, and other Hungarian legislation relevant to the Company's activities and the mandatory legal acts of the EU.

During the processing of personal data and the transmission of data to third parties, the Company always respects fundamental rights and ensures full compliance with the principles of data protection. Accordingly, it ensures that

- personal data should be handled legally and fairly, as well as transparently for the data subject.
- collect personal data only for specific, clear, and legitimate purposes and do not handle them in a way that is incompatible with these purposes;
- the processed personal data are adequate and relevant in terms of the purposes of the data management and are limited to what is necessary;
- the processed personal data are accurate and, if necessary, up-to-date. The Company will take all reasonable measures to delete or correct inaccurate personal data;
- personal data is only stored in a form that enables the identification of the data subjects only for the time necessary to achieve the purposes of data management;
- adequate security of personal data should be ensured by applying appropriate technical or organizational measures, including protection against unauthorized or illegal handling of data, accidental loss, destruction, or damage.

The company requires the recipients of personal data (data controllers participating in joint data management, data processors, and other independent data controllers) to comply with the principles laid down in legislation and the supervisory requirements.

The detailed terms of data management are governed by the Company's Data Management Regulations.

The document details the following:

- the range of persons affected by the Company's given services;
- the range of data recorded on the data subjects in connection with the given service;
- purpose(s) of data management;
- legal basis(es) for data management;
- the retention period of the processed data;
- the recipients of the transmission of processed personal data and the legal basis for the data transmission;
- data processors used during data management; shared data management;
- the rights of the data subjects, so in particular that the data subject - Articles 12-21 of the **General Data Protection Regulation** according to its articles - you can request from the Company, as a data controller, access to your personal data, their correction, deletion or restriction of processing, and you can object to the processing of such personal data, as well as exercise your right to data portability.

The Company, as a member of the OTP Bank Group, treats the personal data it has come to know, as well as the data, facts, and information classified as business secrets, with a high degree of protection following the provisions of the legislation.

The data subjects can request information in writing regarding the management of their personal data, or submit their requests and complaints at the following contact details:

PortfoLion Venture Capital Management Zrt.
Mailing address: 1123 Budapest, Alkotás utca 53. Building C. V. floor
E-mail address: adatvedelem@portfolion.hu

also write to OTP Bank Nyrt, the official performing the official duties of the Company, with their comments regarding data management.
Mailing address: OTP Bank Nyrt. 1131 Budapest, Babér utca 9.
E-mail address: adatvedelem@portfolion.hu

The data subject can also file a complaint with the National Data Protection and Freedom of Information Authority (<http://naih.hu/> ; 1055 Budapest, Falk Miksa utca 9-11.; Postal address: 1363 Budapest, Pf.: 9.; Phone: +36-1 -391-1400; Fax: +36-1-391-1410; E-mail: ugyfelszolgalat@naih.hu .

