

## I. DATA PROTECTION POLICY

### Excerpt

PortfoLion Venture Capital Fund Management Ltd. (hereinafter: the Company) is committed to developing, operating, and applying a regulatory, implementation, and control system that ensures, in accordance with the criteria set out in the applicable legislation and its fundamental business interests, the preservation and protection of business secrets, securities secrets, and personal data.

The personal data managed by the Company include the data necessary for identification and contact, data required for the provision of a given service, as well as data generated and processed during the provision of the service, and the data of communication between the data subject and the Fund Manager through any channel.

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

During the processing and transfer of personal 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 are processed lawfully, fairly, and in a transparent manner for the data subject; personal data are collected only for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes;

personal data processed are adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed;

personal data are accurate and, where necessary, kept up to date; the Company takes every reasonable step to ensure that inaccurate personal data are erased or rectified without delay;

personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;

personal data are processed with appropriate technical or organizational measures ensuring appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

As the data controller, the Company requires the recipients of personal data (joint controllers, processors, other independent controllers) to comply with the principles set out in the legislation and supervisory expectations.

The detailed conditions of data processing are set out in the Company's Data Processing Policy. This document details:

the categories of data subjects related to a given service;

the types of data recorded about the data subjects in connection with the given service;  
the purpose(s) of data processing;  
the legal basis/bases of data processing;  
the retention period of the processed data;  
the recipients of the transferred personal data and the legal bases for data transfer;  
the processors used during data processing; joint data processing arrangements;  
the rights of data subjects, in particular the right, under Articles 12–21 of the General Data Protection Regulation, to request from the Company, as data controller, access to, rectification, erasure, or restriction of processing of personal data concerning them, and to object to such processing, as well as the right to data portability.

As a member of the OTP Bank Group, the Company handles personal data, as well as facts and information qualifying as business secrets, with a high level of protection as set out in the applicable laws.

Data subjects may request written information or submit their requests and complaints concerning the processing of their personal data at the following contact details:

PortfoLion Venture Capital Fund Management Ltd.

Mailing address: 1123 Budapest, Alkotás Street 53. C Building, 5th Floor

E-mail: [adatvedelem@portfolion.hu](mailto:adatvedelem@portfolion.hu)

Data subjects may also submit their comments concerning data processing in writing to the Data Protection Officer of OTP Bank Plc.

Mailing address: OTP Bank Plc., 1131 Budapest, Babér Street 9.

E-mail: [adatvedelem@otpbank.hu](mailto:adatvedelem@otpbank.hu)

Furthermore, data subjects may lodge a complaint with the National Authority for Data Protection and Freedom of Information (<http://naih.hu/>; 1055 Budapest, Falk Miksa Street 9-11; Postal address: 1363 Budapest, P.O. Box: 9; Telephone: +36-1-391-1400; Fax: +36-1-391-1410; E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

