

**OXO TECHNOLOGIES HOLDING PRIVATELY HELD LTD.**  
**PRIVACY POLICY EXTRACT FOR INVESTORS**

Effective from ... December 2020.

## I. INTRODUCTION

**OXO Technologies Holding Privately Held Ltd.** and **OXO Labs Üzletviteli és Tanácsadó Korlátolt Felelősségű Társaság** are members of OXO Group and are affiliated companies and proceed jointly and in close cooperation concerning their activities of funding and accelerating, therefore they constitute as Joint data controllers. "Joint data management", means that several data controllers process personal data together for a common purpose, so it is appropriate to jointly define and adopt their data management rules. Joint data controller quality means that the purpose and means of data management (internal processes, content of forms used, content of shared databases) are defined jointly, and both data controllers have access to the data they jointly manage. Accordingly, in the case of the data processing operations included in this advisory, the data controller is **OXO Technologies Holding Privately Held Ltd.** and **OXO Labs Üzletviteli és Tanácsadó Korlátolt Felelősségű Társaság** together (hereinafter collectively referred to as the "**Companies or the Data Controller or Data Controllers**")

Companies hereby inform those investors who register at "**Register at OXO Stock**" section of <https://oxoholdings.eu/> website or contact the Data Controller by e-mail expressing intention of participating in funding activities (hereinafter referred to as "**Data Subjects**") in relation to the processing of their personal data provided in the course of their registration/contact, in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "**GDPR**") and the Act CXII of 2011 on Informational Self-determination and Freedom of Information. The terms used in this Privacy Policy (hereinafter referred to as "**Policy**") are the same as those in the GDPR. **Please note that the data processing is mainly completed in the OXO IT System** (hereinafter: "**System**"), **which is an internet-based platform developed by OXO Labs Kft. and its affiliates and subcontractors, for the sole purpose of managing the applications and administration of the fundings.**

**Please be informed that providing the personal data is always voluntary, but if the required personal data is not provided then the application for being considered as an investor cannot be considered.**

Pursuant to Article 13 of the General Data Protection Regulation (GDPR), by making this Privacy Policy extract available, we hereby disclose the following information (this Privacy Policy extract is a brief extract of the Data Controllers' Privacy Policy (the "Policy"). The provisions of the Privacy Policy and the relevant legal regulations shall apply to the issues and topics not covered in this extract, and this extract shall be read and understood in conjunction with them.)

The up-to-date version of this extract of Privacy Policy is available at : <https://oxoholdings.eu/> The Data Controller reserves the right to amend its Privacy Policy at any time. The amendments will be published by displaying the consolidated version.

**In any case, please read the present Privacy Policy extract and its amendments in order to have a complete understanding of the rules governing our data management.**

## II. DETAILS OF THE DATA CONTROLLERS

**The publisher of the present Policy and the Data Controllers are:**

**DATA CONTROLLER I:**

**OXO Technologies Holding Privately Held Ltd./OXO Technologies Holding Zártkörűen Működő Részvénytársaság**

**Registered address: 1023 Budapest, Lajos utca 28-32. II. em. 1.**

**Taxation number: 27306660-2-41**

**Company registry number: 01-10-140670**

**Phone: 06 1 209 3094**

**Email: [info@oxoholdings.eu](mailto:info@oxoholdings.eu)**

**Representative of Data Controller I: dr. Oszkó Péter board director (tel: 06 1 209 3094, e-mail: [oszko.peter@oxolabs.eu](mailto:oszko.peter@oxolabs.eu))**

**DATA CONTROLLER II:**

**OXO Labs Üzletviteli és Tanácsadó Korlátolt Felelősségű Társaság**

**Registered address: 1023 Budapest, Lajos utca 28-32.**

**Taxation number: 24992165-2-41**

**Company registry number: 01-09-193434**

**Phone: 06 1 209 3094**

**Email: [info@oxolabs.eu](mailto:info@oxolabs.eu)**

**Representative of Data Controller II: dr. Oszkó Péter managing director (tel: 06 1 209 3094, e-mail: [oszko.peter@oxolabs.eu](mailto:oszko.peter@oxolabs.eu))**

**III. INDICATION OF DATA PROCESSORS**

In the course of our activity, based on a contractual relationship, we receive the services of the following data processors:

Activity	Name	Seat address	Company reg. number	Phone number	E-mail
Portfolio managing	OXO Ventures Zrt.	1023 Budapest, Lajos utca 28-32.	01-09-193434	06 20 984 5387	<a href="mailto:oszko.peter@oxoholdings.eu">oszko.peter@oxoholdings.eu</a>
Server provider	Servergarden Kft.	1023 Budapest, Lajos utca 28-32. II. em. 1.	01-09-350297	06 1 432 3133	<a href="mailto:info@servergarden.hu">info@servergarden.hu</a>

Website operator	OXO Labs Kft.	1023 Budapest, Lajos utca 28-32.	01-09-193434	06 20 984 5387	info@oxolabs.eu
IT system operator	OXO Labs Kft.	1023 Budapest, Lajos utca 28-32.	01-09-193434	06 20 984 5387	info@oxolabs.eu
Accountancy service provider	RSM Hungary	1139 Budapest, Váci út 99-105. Balance Hall. ép. IV. em.	01-10-045727	06 1 886 3701	info@rsm.hu
Legal service provider	DLA Piper Business Advisory Kft.	1124 Budapest, Csörsz utca 49-51.	01-09-334862	06 1 510 1100	businessadvisory-hungary@dlapiper.com
Legal service provider	Polgár és Bebők Ügyvédi Iroda	1011 Budapest, Szilágyi Dezső tér 1. 2. em	00 18 246795	06 1 799 8332	admin@hunlaw.hu
Video interview system provider	Indivizo Zrt.	1123 Budapest, Alkotás utca 17-19	01-10-049785	06 1 778 1226	hello@indivizo.com
Auditor	TRUSTED ADVISER Kft.	1082 Budapest, Baross utca 66-68. 3. em. 11.	01-09-279282	06 20 966 5652	office@trustedadviser.hu
Marketing and PR consultant	Jánoska Rita Zsófia	9400 Sopron, Deák tér 22.	50554982	06 30 578 4854	rita.janoska@itbn.hu
Tender consultant	dr. Szilágyi András	1147 Budapest, Huszt utca 44. 3/1	52114764	06 70 377 3847	dr.andras.szilagyi@gmail.com
Electronic signature interface provider	Trustchain Systems Kft.	1133 Budapest, Gogol utca 26. 1. em	01-09-294941	06 70 218 5977	info@trustchain.com

Billing provider	KBOSS.hu Kft.	1031 Budapest, Záhony utca 7.	01-09-303201	06 30 354 4789	kboss@kboss.hu
Office renting	OXO Services Kft.	1023 Budapest, Lajos utca 28-32.	01-09-208466	06 30 713 1373	bojtor.tamas@oxoholdings.eu

#### IV. SOURCE OF DATA

During the application process, the investor has to present own personal and contact data, the source of the data is the data subject.

#### V. DATA MANAGEMENT

The Data Controller, in the context of its funding activities, performs the following data management activities listed below separately for transparency purposes by indicating the description of data processing, type of the data processed, the purpose of the data management, the legal basis, the source of the data, the recipients of the data management and the duration of data storage in a chart format.

##### 1. Contact Data Controller as investor applicant via e-mail

Applicants considering becoming an investor can directly contact Data Controller via email address [info@oxoholdings.eu](mailto:info@oxoholdings.eu). After receiving the email, OXO replies within the shortest possible time, this, however, may take 2-3 weeks due to internal processes.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
First contact by e-mail	Name E-mail address Any further data shared voluntarily	Contacting and communicating with the Data Subject	Given consent (GDPR Article 6. (1) a)) which is given by sending the contact e-mail to Data Controller	Data Subject	Portfolio management services provider, as Data Processor  Server provider, as Data Processor  E-mail service provider as Data Processor	In case an investor applicant does not register in the OXO IT System and further cooperation and investment agreement is not reached, then the contact email is deleted after 30 days.

## 2. Application in OXO IT system/application for becoming an investor:

Applicants who want to become investors (hereinafter: “Investor”), with clicking the “Register at OXO Stock” button on the website <https://oxoholdings.eu/> have a possibility to apply in the OXO IT system as an Investor.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Application in OXO IT System	<u>Data of Investor</u> Type of investor (Angel, Venture capital firm, Accelerator)  Name E-mail address Phone Password Password confirmation  Company data (not personal data)	Receiving application from investor	Legitimate interest of collecting and selecting investors - as general business activity (GDPR Article 6. (1) f)	Data Subject	Portfolio management services provider, as Data Processor  Server provider, as Data Processor  Website operating services provider as Data Processor  IT system provider as Data Processor	In case of rejection, we delete the investor’s profile and submitted application after 5 years, if the investment agreement is signed then data will continue to be processed as per point 3. below.

## 3. Investment phase: investment agreement

After the successful negotiations, an investment agreement will be signed by the Investor and the Data Controller.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Investment documentation	Data of Investor:	Completion of documentation	Performance of contract (GDPR)	Data Subject	Portfolio management services provider, as	Until the existence of Data Controller

	<p><u>If a private person:</u> Name Address Mother's maiden name Place and date of birth Tax ID Number Signature</p> <p><u>If a company:</u> Name and function of representative of company Signature of the representative</p>	required for investment	Article 6. (1) b)		<p>Data Processor</p> <p>Server provider, as Data Processor</p> <p>Website operating services provider as Data Processor</p> <p>IT system provider as Data Processor</p> <p>Archiving service provider as Data Processor</p> <p>Legal expert co-operating in the completion of the documentation as sole Data controller</p>	
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#### 4. Presentation of investors on the website

After signing the investment agreement, the Investors have the possibility to present their name, photo, cv or LinkedIn profile on the website <https://oxoholdings.eu/>.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Presentation of investors	Name of investor Photo of investor Additional cv data or LinkedIn Profile	Presentation of investors	Given consent (GDPR Article 6. (1) a))	Data Subject	<p>Portfolio management services provider, as Data Processor</p> <p>Server provider, as Data Processor</p> <p>Website operating</p>	<p>Until withdrawal</p> <p>Until the cooperation with the investor</p>

					services provider as Data Processor	
					IT system provider as Data Processor	

**5. Financial settlements**

Documents / data containing the Data Subject’s consent may be presented / handed over to the authority during an incidental data protection authority investigation.

**VI. INFORMATION ON THE RIGHTS OF DATA SUBJECTS**

**In relation to the present data management procedures, the Candidate is entitled to the following rights:**

1. **Right of access to your personal data:** You have the right to receive feedback from the Data Controller about whether your personal data is being processed and, if such data is being processed, you are entitled to have access to your personal data and all the relevant statutory information. Therefore, you have the right to contact the Data Controller and request information about your data management and request access to your data.
2. **Right of rectification:** In the event of a change in your data, you may at any time request rectification of your data by providing correct information.
3. **Right to the erasure of data:** You are entitled to request the Data Controller to delete your data if the data management is no longer necessary for the purpose for which the data were recorded, if the processing is unlawful or if the deletion is required by law.
4. **Right to restrict data management:** You may request a restriction of data management if the data processing is unlawful or if the Data Controller no longer needs the data for the purpose of data management, but you wish to use it for the submission of a legal claim. Restricting data management means that the data can only be stored until the restriction is lifted and can only be used to bring a legal claim.
5. **Right to object to processing of personal data:** You are entitled to object to the processing of your personal data at any time for reasons related to your own situation. In such a case, the Data Controller will individually examine whether there is a legitimate reason justifying the need for data management.
6. **Right to data portability:** You are entitled to receive from the Data Controller the personal data it processes about you, in a structured, commonly used and machine-readable format and you shall have the right to transmit those data to another controller without hindrance from the Data Controller to which the personal data have been provided. When exercising the right to portability of data, you are entitled to request, if technically feasible, the direct transmission of personal data between controllers.

7. **Right to file a complaint to the Supervisory Authority:** You are entitled to file a complaint with the National Authority for Data Protection and Freedom of Information. (Contact: 1055 Budapest, Falk Miksa utca 9-11., 1363 Budapest, Pf. 9.; phone: +36 1 391-1400; telefax: +36 1 391 1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu))
8. **Judicial Enforcement:** You have the right to apply to the court if you consider that the Data Controller or the Data Processor acting on its behalf or acting on its instructions manages your personal data in violation of the requirements for the processing of personal data.
9. **Right to withdraw consent:** in case of consent based data processing the consent may be withdrawn at any time by written notice sent to [info@oxoholdings.eu](mailto:info@oxoholdings.eu) or by telephone, calling the following number: **06 1 209 3094** The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

## VII. DATA SECURITY

The Data Controller shall ensure data security. For this purpose, it shall take such technical and organizational measures and establish the procedural rules necessary to enforce the applicable laws, data and confidentiality rules. The Data Controller protects the data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against unavailability due to accidental destruction and damage and against becoming inaccessible due to a change in the technique used.

The Data Controller shall also provide for the enforcement of the data security rules by means of internal rules, instructions and procedural rules separate from the contents of this Policy. The Data Controller takes into account the state of current technology in the definition and application of data security measures and chooses more than one possible data management solution that provides a higher level of protection for personal data unless it would constitute a disproportionate difficulty.

### **Automated decision-making, profiling**

Please note that we do not use automated decision-making or profiling during the selection process.

If you have any questions regarding the management of your personal data, please contact us at [info@oxoholdings.eu](mailto:info@oxoholdings.eu)