PRIVACY NOTICE

SMTplus Korlátolt Felelősségű Társaság (hereinafter: **SMTplus** or the **Controller**) publishes the following Privacy Notice to inform data subjects.

Name of the Controller:	**SMTplus Korlátolt Felelősségű Társaság**
Registered office:	Téglagyári utca 10, 2750 Nagykőrös, Hungary
Company registration number:	13-09-141507
Tax number:	22999410-2-13
Phone:	+36209171949
E-mail:	info@smtplustech.com

I. Principles of data processing

Personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject ("lawfulness, fairness and transparency");
- collected only for specified, explicit and legitimate purposes and not further processed by SMTplus in a manner that is incompatible with those purposes ("purpose limitation");
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimisation");
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ("accuracy");
- 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 ("storage limitation");
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ("integrity and confidentiality").

II. Security of data processing

In the course of its operations, the Controller's protection of personal data rests on

- physical,
- logical and
- administrative

pillars. The IT tools used in providing the service are selected and operated so that the data processed

- are accessible to those authorised to access them (availability);
- have assured authenticity and authentication (authenticity of processing);
- can be shown to be unaltered (data integrity);
- are protected against unauthorised access (data confidentiality).

In the course of data processing, SMTplus maintains

- confidentiality: it protects information so that only those authorised can access it;
- integrity: it protects the accuracy and completeness of the information and of the processing method;
- availability: it ensures that when an authorised user needs it, they can actually access the required information and the related tools are available.

III. Data processing activities carried out by the Controller

1. Data processing related to sending newsletters

Purpose of processing: to inform interested parties about SMTplus news.
Categories of data processed: name, e-mail address.
Legal basis for processing: Article 6(1)(a) GDPR, "the data subject's consent".
Retention period: until the consent is withdrawn.

The Controller processes personal data collected for this purpose only until the data subject unsubscribes from the newsletter list or fails to give confirmation.

The data subject may unsubscribe from the newsletter at any time using the link at the bottom of the e-mails, by sending an unsubscribe request to info@smtplustech.com, or by post to the following address: Téglagyári utca 10, 2750 Nagykőrös, Hungary.

2. Data processing related to one-off enquiries

Purpose of processing: to enable contact, communication and the provision of information.
Categories of data processed: name, e-mail address, text of the message (which may contain personal data), phone number.
Legal basis for processing: Article 6(1)(a) GDPR, "the data subject's consent".
Retention period: until the requested information has been provided, after which the personal data are deleted.

3. Processing of contact persons' data

Purpose of processing: to maintain contact with business partners.
Categories of data processed: name, e-mail address, text of the message (which may contain personal data), phone number.
Legal basis for processing: Article 6(1)(a) GDPR, "the data subject's consent".
Retention period: until the end of the business relationship or until the data subject withdraws consent.

IV. Data processors

A data processor is a natural or legal person who or which processes personal data on behalf of the Controller.

Details of the data processor	Activity performed by the data processor
Name: ININET Internet Korlátolt Felelősségű Társaság Registered office: Szinyei Merse utca 10, 1063 Budapest, Hungary Company registration number: 01-09-970252 Tax number: 23537646-2-42 E-mail: info@ininet.hu Phone: +36 20 293 9058 Registering court: Company Registry Court of the Budapest-Capital Regional Court	web hosting

V. Rights of data subjects in relation to data processing

The data subject may request information on the processing of their personal data, and may request the rectification of their personal data and – except for processing required by law – their erasure without undue delay, in the manner indicated when the data were collected.

At the data subject's request, the Controller provides information on the data it processes, or that are processed by a processor engaged by it, on the purpose, legal basis and duration of the processing, on the name and address (registered office) of the processor and its activities related to the processing, and

on who receives or has received the data and for what purpose. The Controller provides this information in writing, in an intelligible form, as soon as possible and at the latest within 15 days of the submission of the request. The information is free of charge if the requesting person has not yet submitted a request for information on the same matter to the Controller in the current year. In other cases, SMTplus may charge a fee to cover its costs.

The Controller erases personal data if their processing is unlawful, if the data subject requests it, if the purpose of processing has ceased, if the statutory retention period has expired, or if erasure has been ordered by a court or by the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).
SMTplus notifies the data subject, and all those to whom the data were previously transferred for processing, of any rectification or erasure. Notification is omitted if, having regard to the purpose of processing, it does not harm the legitimate interests of the data subject.

The data subject may object to the processing of their personal data if

- the processing (transfer) of the personal data is necessary solely for enforcing a right or legitimate interest of the Controller or of the recipient, unless the processing is required by law;
- the personal data are used or transferred for direct marketing, opinion polling or scientific research;
- the right to object is otherwise permitted by law.

SMTplus – while suspending the processing – examines the objection as soon as possible, but no later than 15 days after the submission of the request, and informs the applicant of the outcome in writing. If the objection is justified, the Controller terminates the processing – including any further collection and transfer of data – and blocks the data, and notifies of the objection and the measures taken on its basis all those to whom it previously transferred the personal data concerned and who are obliged to take action to enforce the right to object.

If the data subject does not agree with the Controller's decision, they may bring the matter before a court within 30 days of being notified of it.

SMTplus may not erase the data subject's data if the processing is required by law. However, the data may not be transferred to the recipient if the Controller has agreed with the objection or a court has established that the objection is justified.

Legal remedies and complaints may be submitted to the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH):

- Registered office: Szilágyi Erzsébet fasor 22/c, 1125 Budapest, Hungary
- Postal address: 1530 Budapest, Pf.: 5., Hungary
- Phone: +36 1 391 1400
- URL: https://naih.hu
- E-mail: ugyfelszolgalat@naih.hu

VI. Amendments to this Privacy Notice

The Controller reserves the right to amend this Privacy Notice unilaterally, with prior notice to users. By using the service after the amendment takes effect, you accept the amended Privacy Notice.

Key laws and standards relating to the activities of SMTplus, information security and the processing of personal data

- The Fundamental Law of Hungary (Article VI(3))
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information

- 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 (General Data Protection Regulation, GDPR)
- Act XXXIV of 2019 on the amendment of laws necessary for the implementation of the European Union data protection reform
- Act V of 2013 on the Civil Code (Book Three – Personality rights, Titles XI and XII)
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities
- Act CLV of 1997 on Consumer Protection
- Act CLV of 2016 on Official Statistics
- MSZ EN 60950 Safety of information technology equipment
- MSZ ISO/IEC 27001:2014 Information technology. Security techniques. Information security management systems. Requirements

Nagykőrös, 14 October 2026