

Information on data processing

Magyar Telekom Plc. as data controller (seat: 1097 Budapest, KönyvesKálmán krt. 36, Hungary; registration no.: 0110-041928; taxation no.: 10773381-2-44; the „Data Controller”) hereby informs the Data Subjects in connection with the processing of personal data regarding **the keeping of the Data Controller’s Share Register, the exercising of the shareholders’ rights, the payment of dividends and the keeping of minutes at the Data Controller’s general meetings** on the basis of Regulation (EU) 2016/679 of the European Parliament and the Council (April 27, 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” or „GDPR”) as follows:

1. The identity and the contact details of the Data Controller:

Magyar Telekom Plc. (registered seat: 1097 Budapest, Könyves Kálmán krt. 36.; Company Register No.: Cg. 01-10041928; Tax number: 10773381-2-44)

Contact person: Magyar Telekom Investor Relations;

E-mail: investor.relations@telekom.hu

Postal address: 1541 Budapest Phone number: +36-1-458-0332

2. The name and the contact details of the data protection officer: dr. Adrienn Esztervári (address: 1097 Budapest, Könyves Kálmán krt. 36, Hungary; e-mail address: DPO@telekom.hu)

3. The categories of the processed personal data, the purposes of the processing for which the personal data are intended, the legal basis for the processing and the period for which the personal data will be stored:

Purposes of the processing	Legal basis for the processing	Categories of personal data	Period for which the personal data will be stored
<p>Identification of the shareholders in order that the Data Controller be able to communicate directly with the shareholders regarding the exercising of the shareholder’s rights and to enforce the provisions on the restrictions of the voting rights determined by the statutes.</p>	<p>The processing is necessary for compliance with a legal obligation to which the Data Controller is subject (Article 6 (1) c) of GDPR), with respect to Articles 3-4 of Act LXVII of 2019 on Encouraging Long-Term Shareholder Engagement and amendments of further regulations for harmonization purposes (“SRD Act”).</p>	<p>a) personal data necessary for the identification of the shareholder (information on the identity of the shareholder): name and contact details of the shareholder (including the complete address and the e-mail address if it is given by the shareholder)</p> <p>b) number of shares in the ownership of the shareholder owns; and</p> <p>c) the type or class of the shares in the ownership of the shareholder and the date of the acquisition of them, if the Data Controller requests it.</p>	<p>The personal data is processed for the reason determined by the SRD Act for a period of maximum 12 months counted from obtaining knowledge of the termination of the shareholder status.</p>

Keeping of the Share Register of the Data Controller.	The processing is necessary for compliance with a legal obligation to which the Data Controller is subject (Article 6 (1) c)	The shareholder's (in case of jointly owned shares, the joint representative's): <ul style="list-style-type: none"> • name, 	According to Article 3:246 (4) of the Civil Code, all data deleted from the shareholder register shall be kept identifiable, i.e. the
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Purposes of the processing	Legal basis for the processing	Categories of personal data	Period for which the personal data will be stored
	of GDPR), with respect to Articles 3:245-3:248 of Act V of 2013 on the Civil Code (the "Civil Code").	<ul style="list-style-type: none"> • address, • number of shares or interim shares for each series of shares, ownership ratio of shareholders for each series of shares. 	final deletion of the data shall not be executed until the limitation period (5 years) determined by Article 6:22 of the Civil Code has not lapsed counted from the termination without succession of the Data Controller.
Exercising of the shareholders' rights.	The processing is necessary for compliance with a legal obligation to which the Data Controller is subject (Article 6 (1) c) of GDPR), with respect to Articles 3:268-3:281 of the Civil Code.	<p>The shareholder's (in case of shares in coownership, the joint representative's) or the representative of the shareholder's:</p> <ul style="list-style-type: none"> • name, • address, • number of shares, • number of votes, • propositions and observations done in the framework of the general meeting, • e-mail address (optional, Article 3:271 (2) and Article 3:272 (4)). <p>When registering to the general meeting the shareholder (authorized representative of the shareholder) shall identify him/herself.</p>	The limitation period (5 years) determined by Article 6:22 of the Civil Code counted from the termination of the shareholder status.

<p>The payment of dividends by the Data Controller.</p>	<p>The processing is necessary for compliance with a legal obligation to which the Data Controller is subject (Article 6 (1) c) of GDPR), with respect to Article 3:262 of the Civil Code and Act CL of 2017.</p>	<p>The shareholder's:</p> <ul style="list-style-type: none"> • name, • birth name, • place and date of birth, • mother's birth name, • nationality, • tax number, • address, • number of shares or interim shares for each series of shares, 	<p>8 years counted from the year of acceptance of the annual financial statements of the year following the payment of dividends according to Article 169 of Act C of 2000.</p>
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Purposes of the processing	Legal basis for the processing	Categories of personal data	Period for which the personal data will be stored
		<ul style="list-style-type: none"> • ownership ratio of shareholders in for each series of shares, • bank account number. <p>In case of the nonHungarian natural person, the following data are necessary, besides the above:</p> <ul style="list-style-type: none"> • passport number or the tax number issued by the Hungarian tax authority, address based on residency and in case of the existence of such, Hungarian address (residence). 	

Keeping the minutes at the general meeting and the punctual recording of the speeches, comments and events of the general meeting.	<p>The processing is necessary for the purposes of the legitimate interests pursued by the Data Controller (Article 6 (1) f) of GDPR), with respect to Articles 3:278 and 2:48 of the Civil Code.</p> <p>(The data subject is entitled to object against the voice recording also prior to his/her speech or comment. In case of such objection, no voice recording will be made regarding the speech of the objecting data subject.)</p> <p>It is the legitimate interest of the Data Controller as a public limited liability company to document and record the events</p>	Record of voice (record of voice of the speeches and statements at the general meeting).	1 year counted from the date of the general meeting, with respect to Article 3:36(1) of the Civil Code and Article 79 of Act V of 2006.
Purposes of the processing	Legal basis for the processing	Categories of personal data	Period for which the personal data will be stored
	of the general meetings in the minutes punctually and completely, since it is indispensable for the requirements of transparency, and for the compliance with corporate law and capital market standards.		

According to Article 3:262 (1) of the Civil Code, shareholders shall be entitled to dividend if they are registered in the Share Register at the date of the general meeting adopting a resolution on the dividend payment. Accordingly, in case the shareholder does not initiate his/her registration in the Share Register, i.e. the keeping of the Share Register – as the purpose of the processing – does not happen concerning the given shareholder (data subject), the data subject will not be entitled to dividends. This is the potential consequence if the processing does not take place.

4. Automated individual decision-making (including profiling):

No automated individual decision-making (including profiling) takes place in the framework of the processing.

5. Transfer personal data, the recipients or categories of recipients of the personal data:

The Data Controller uses the following data processor in connection with the processing: **KELER Központi Értéktár Zártkörűen Működő Részvénytársaság** (registered seat: 1074 Budapest, Rákóczi út 70-72.; company registry number: 01 10 042346; tax number: 10873151-2-44; contact details: keler@keler.hu) that performs administrative services regarding the payment of dividends and keeping the Share Register.

No transfer of data to third countries (i.e. outside the European Union) or to international organizations takes place.

According to Article 3:247 (1) of the Civil Code the shareholder register is open to public access.

6. The data subject's rights in connection with the processing:

The data subject may exercise the following rights:

- a) right of access to his/her personal data,
- b) right of rectification of his/her personal data,
- c) right to erasure of his/her personal data or restriction of processing concerning the data subject;
- d) right to data portability (if the additional conditions are met); and
- e) in case of data processing based on the legitimate interest of the Data Controller or a third party, right to object.

Right of access:

The data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data. The Data Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Data Controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

According to Article 3:247 (2) of the Civil Code, all persons having a registered or deleted data in the shareholder register shall be entitled to request from the keeper of the shareholder register a copy of the section pertaining to them. Copies shall be supplied to the requesting person, within five days and free of charge.

According to Article 3:278 (5) of the Civil Code, any shareholder shall be entitled to request a copy or an extract of the minutes of general meetings from the board of directors.

Right to rectification:

The data subject shall have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning him or her.

Right to erasure:

The data subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay and the Data Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- (d) the personal data have been unlawfully processed;
- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject;

- (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

Right to restriction of processing:

The data subject shall have the right to obtain from the Data Controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the Data Controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

Right to data portability:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Data Controller to which the personal data have been provided, where: (a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) of the GDPR or on a contract pursuant to point (b) of Article 6(1) of the GDPR; and (b) the processing is carried out by automated means.

Right to object:

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

General rules regarding the data subjects' rights:

The Data Controller shall provide information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Data Controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

Information to the data subject and any actions taken shall be provided free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Data Controller may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request. The Data Controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

Where the Data Controller has reasonable doubts concerning the identity of the natural person making the request, the Data Controller may request the provision of additional information necessary to confirm the identity of the data subject.

7. Possible legal remedies:

The data subject may turn to the Data Controller's data protection officer (dr. Adrienn Esztervári; address: 1097 Budapest, Könyves Kálmán krt. 36; e-mail address: DPO@telekom.hu) in connection with the processing of his/her personal data at any time.

The data subject has the right to lodge a complaint with the National Authority of Data Protection and Freedom of Information (*Nemzeti Adatvédelmi és Információszabadság Hatóság*; Postal address: 1530 Budapest, Pf.: 5., Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, Phone number: +36 (1) 391-1400; Telefax: +36 (1) 391-1410; E-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

In case of the infringement of his/her rights, the data subject may submit a claim against the Data Controller to the court. The court shall proceed out of turn. The Data Controller shall prove that the processing is in compliance with the applicable laws. The Regional Court (*törvényszék*), in Budapest, the Budapest-Capital Regional Court (*Fővárosi Törvényszék*) is competent. The lawsuit may also be initiated in front of the Regional Court that has jurisdiction based on the permanent or temporary address of the data subject.

The Data Controller shall compensate the data subject for the damages caused to the data subject by the unlawful processing of the personal data of the data subject or by the infringement of data security requirements. The Data Controller shall be exempted from liability if it can prove that the damages were unavoidable and the causes were out of the scope of data processing. Damages that were due to the data subject's deliberate or grossly negligent behavior shall not be compensated.