

PRIVACY NOTICE
on the personal data processing activities carried out in relation to the VERTIS Client Satisfaction Survey

Vertis Environmental Finance Ltd. (hereinafter referred to as "VEF" or "data controller") in accordance with Article 13 and 14 of the Regulation 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, and repealing Directive 95/46/EC ("General Data Protection Regulation", "GDPR" or the "Regulation"), hereby provides information relating to the personal data processing carried out in the context of the VERTIS Client Satisfaction Survey.

Identity and contact details of the data controller

Name of the controller: Vertis Environmental Finance Ltd.
Seat of the controller: Csörsz utca 45, 1124 Budapest, Hungary
Email: privacy@vertis.com
Contact details of the data protection officer: vertis@dataprotection.eu

Information relating to your participation in the VERTIS Client Satisfaction Survey

If You received a request to participate in the VERTIS Client Satisfaction Survey is because You have subscribed to the VERTIS NEWSLETTER and the request for participation was delivered to You in the form of a VERTIS NEWSLETTER. Even if our main purpose is to obtain responses from persons in direct business relationship with a trading entity of the VERTIS Group, which can be either the data controller or Vertis International Trading SE, the criteria of participation (and for selection of inviting a person to participate) is not that You, or the company You represent or act on behalf of, be an active client of the data controller. Our survey aims to obtain a general understanding of satisfaction in relation to the activities of the VERTIS Group, without analysing separately, or even identifying whether the response provider is a client or counterparty to our particular group entities. In that meaning, the data controller shall not act as a data processor for those other entities but as standalone data controller pursuing group-level marketing activities.

If You are a contact person (representative, trader, etc.) of a trading counterparty of our group entity Vertis International Trading SE, the VERTIS Client Satisfaction Survey and the questions in it should at all times be interpreted in accordance with the nature of operation of that entity (acting as own account trader to its counterparties rather than a service provider).

Purpose, legal basis and retention period of the processing

Purpose of data processing	Personal data processed	Legal basis	Retention period
Performing the VERTIS Client Satisfaction Survey	Your answers to the survey, date and time of filling out the questionnaire, randomly created ID number of the survey, IP address	Your consent (Art 6 (1) a) of the GDPR)	One-off data transfer, no data is retained; the anonymous answers shall be kept without time limit (as these do not qualify personal data)

You are not obliged to participate in the VERTIS Client Satisfaction Survey and You shall not be required to provide any additional personal data for it other than your answers. When You push the "Start" button in our request message to participate in the survey, You will not be requested to identify yourself and You will be providing your answers on the Typeform platform. The Typeform platform will act as a data processor for VEF in a way that your identity will remain completely anonymous to us (in legal terms, your personal data will be pseudonymised, but in a manner that the data controller guarantees it will have no access to any such information which would be make it possible to identify You).

You may provide the consent referred to above by the act of clicking on the “Start” button in the email received from us. This is absolutely on a voluntary basis, you are not obliged to do it. If you do not provide your consent, that is, do not start and then submit the survey, we will not be able to have the survey incentive sent to You. You can withdraw the consent at any time; however, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

For obtaining the survey incentive, You will be redirected from the Typeform platform to a third party service provider (MWLB Marketing Agency, available at mwlb.es; under company name Real Lab Estate SL, registered at Calle Malmoe 83, 1B, 28032 Madrid, Spain) which we engaged for sending you the survey incentive. Once redirected to their webpage, You will be requested to provide your personal details necessary for the agency to send you the incentive directly. The agency will act as an independent data controller, not instructed by the data controller in terms of data processing, and will not provide us with your name or any other personal data received from you. Please consult their privacy policies at <https://mwlb.es/politica-de-privacidad/>.

Recipients of the personal data

In the context of the data processing activities referred to in this privacy notice, personal data shall be shared with the following addressees. Your answers to the survey, date and time of filling out the questionnaire, randomly created ID number of the survey, IP address will be given to TYPEFORM SL, the data processor involved for providing the platform for the VERTIS Client Satisfaction Survey and making available the answers to VEF on an anonymised basis afterwards. Please note however that it is not us but You providing these pieces of data to Typeform, We will not forward any information on You to Typeform.

Similarly to the above, no data is forwarded by us to Real Lab Estate SL, which is the operator of the agency involved for the sending of the survey incentives, all data is provided by You to them directly.

Data transfer to third countries

Data transfer to third countries may be carried out by the data controller if, in relation to the involvement of the service providers acting as data processors, as detailed above, use additional data processors for storing or otherwise processing your data. Such sub data processors are detailed in TYPEFORM SL’s privacy policies, available at <https://www.typeform.com/help/a/what-other-companies-do-we-share-data-with-360029617191/>.

Automated decision making, including profiling

Automated decision making, including profiling, does not occur in the context of the data processing referred to in this Privacy Notice.

Your rights in relation to our data processing activity

As a data subject, you can exercise

- the right to access;
- the right to rectification;
- the right to erasure (right to be forgotten);
- the right to restrict the processing
- the right to object to the processing of your personal data,

subject to the conditions as set out by the GDPR.

In addition, where the legal basis of the data processing is the performance (or preparation) of a contract You are to become a party to, or Your consent, You shall also have the right to data portability.

a) Right to access

You as data subject shall have the right at any time to request information whether your personal data are processed, and if so, in what manner such data are processed by the data controller, including the purposes of the processing, recipients to whom the personal data have been or will be disclosed, the source of information from where the data controller obtained such data, the retention period of such data, any right that they may have concerning the processing, and where personal data are transferred to a third country or any international organisation, you as data subject shall have the right to be informed of the appropriate safeguards relating to the transfer. When exercising the right of access, the data subject shall also be entitled to request copies of such data.

In the event the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in an electronic form. If the right of access exercised by the data subject would affect adversely the rights and freedoms, in particular the business secrets or intellectual properties of others, the data controller shall have the right to refuse the request of the data subject to the extent necessary and proportionate. For any further copies of the above information requested by the data subject, the data controller may charge a reasonable fee that is proportionate to the related administrative costs.

b) Right to rectification

The data controller shall rectify or supplement the personal data of the data subject based on any related request from the data subject. Where there is any doubt concerning any rectified data, the data controller may call upon the data subject to adequately verify, preferably by an official document, the rectified data for the data controller. If the data controller has disclosed the personal data affected by such right to any other persons (i.e. to another recipient e.g. the data processor), the data controller shall inform such persons of the rectification of such data without delay, provided that it is not impossible or does not require a disproportionate effort from the data controller. At the request of the data subject, the data controller shall inform the data subject of the identity of these recipients.

c) Right to erasure ("right to be forgotten")

Where You as data subject request the erasure of any or all of your personal data, the data controller shall have the obligation to erase those without undue delay, if:

- the data controller does not need the affected personal data in relation for the purposes for which they were collected or otherwise processed;
- processing was based on your consent, however, you have withdrawn your consent, and there is no other legal ground for the processing;
- processing was based on the legitimate interest of the data controller or a third party, however, You have objected to the processing, and there are no overriding legitimate grounds for the processing, except for objection to data processing for direct marketing purposes;
- the personal data have been unlawfully processed by the data controller, or
- the personal data have to be erased for compliance with a legal obligation.

If the data controller has disclosed the personal data affected by such right to any other persons (i.e. to another recipient e.g. the data processor), the data controller shall inform such persons of the rectification of such data without delay, provided that it is not impossible or does not require a disproportionate effort from the data controller. At the request of the data subject, the data controller shall inform the data subject of the identity of these recipients. The data controller shall not always be required to erase the personal data, in particular where e.g. the data processing is necessary for the establishment, exercise or defence of legal claims.

d) Right to restriction of processing

You as data subject may request restriction of processing in relation to your personal data where one of the following applies:

- the accuracy of the personal data is contested by the data subject, in this case restriction of processing shall be applied for a period enabling the data controller to verify the accuracy of the personal data;
- the processing is unlawful, but the data subject opposes the erasure of the data, and requests the restriction of their use instead;
- 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 and defence of legal claims; or
- the data subject has objected to the processing, in this case restriction of processing shall be applied until it is verified whether the legitimate grounds of the data controller override those of the data subject.

Restriction of processing means that such personal data shall not be processed by the data controller or shall, with the exception of storage, only be processed with the data subject's consent, or in the absence of such consent the data controller may also process these data 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 European Union or of a member state of it. The data subject shall be informed by the data controller before the restriction of processing is lifted. If the data controller has disclosed the personal data affected by such right to any other persons (i.e. to another recipient e.g. the data processor), the data controller shall inform such persons of the rectification of such data without delay, provided that it is not impossible or does not require a disproportionate effort from the data controller. At the request of the data subject, the data controller shall inform the data subject of the identity of these recipients.

e) Right to object

Where processing of data concerning You as data subject is based on the legitimate interest of the data controller or a third party, You as data subject shall have the right to object to processing of data. The data controller shall not be obliged to accept such objection, unless the data controller demonstrates

- compelling legitimate grounds for the processing which override the interests, rights and freedoms of the User, or
- that the data processing is related to the submission, enforcement or protection of the data controller's legal claims.

f) The right to data portability

Right to data portability generally means that the data subject shall have the right to receive the personal data concerning him/her, which he/she provided to the data controller based on consent or on a contract, and are processed by the data controller by automated means (e.g. in a computer system), in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller, or the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

In addition to the above, as a data subject, you have the right to lodge a complaint with a supervisory authority, in particular in the member state of the EU of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR. For a list of the data protection supervisory authorities, see https://edpb.europa.eu/about-edpb/about-edpb/members_en. You may also enforce your rights in court pursuant to the provisions of the GDPR and the Hungarian Civil Code or other legislation applicable to you.

Additionally, according to Art. 25 of the Hungarian Act CXII of 2011 on the right to informational self-determination and freedom of information, the close relative of the deceased data subject or the person authorized by the deceased data subject might exercise data subject rights as determined by that Act within 5 years from the date of the death.

How we handle your requests or questions in relation to our data processing activities

We shall provide information on the action taken on your questions or requests submitted to us relating to the processing of your personal data or to the exercise of your rights as 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 we receive. We shall inform You of any such extension within one month of receipt of the request, together with the reasons for the delay. If You make the request by electronic means, we shall also provide you our answer by electronic means where possible, unless otherwise requested by You. Should it be the case that we do not take action on your request, we shall inform You on that without delay and at the latest within one month of receipt of the request, explaining you the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.