



LOXOLOCK

PRIVACY NOTICE

in which we inform you, as a visitor to our website and user of our services, about our company's data processing and data protection policies.

1. What principles do we follow in our data processing?

Our company follows the following principles in data processing:

- a) We process personal data lawfully, fairly, and transparently for you.
- b) We collect personal data only for specified, explicit, and legitimate purposes and do not process it in a manner incompatible with those purposes.
- c) The personal data we collect and process is adequate, relevant, and limited to what is necessary for the purposes of data processing.
- d) We take all reasonable steps to ensure that the data we process is accurate and, where necessary, up-to-date; we promptly delete or correct inaccurate personal data.
- e) We store personal data in a format that allows for identification only as long as necessary to achieve the purposes of data processing.
- f) Using appropriate technical and organizational measures, we ensure the security of personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage.

Our company processes your personal data:

- a) based on your informed and voluntary consent, only to the extent necessary, and always for a specified purpose, which includes collecting, recording, organizing, storing, and using your data.
- b) In some cases, the processing of your data is based on legal requirements and is mandatory; in such cases, we will specifically inform you of this.
- c) In certain cases, we or a third party have a legitimate interest in processing your personal data, such as for the operation, development, and security of our website.

2. Who are we?

Our company's headquarters: 1036 Budapest, Bécsi út 52. I. floor, door 19

Our websites: <https://loxolock.com/>

Contact: Loxolock Trade Innovation Zrt

Mailing address: <https://loxolock.com/>

Email: info@loxolock.com

Tax ID: 32599011-2-41

Company registration number: 01-10-142887

Our company is not required to appoint a Data Protection Officer under Article 37 of the GDPR.

<https://loxolock.com/>

A Loxolock Trade Innovation Zrt. weboldalakkal kapcsolatos Adatkezelési Szabályzata



Our company's hosting provider:

- Name: Websupport Magyarország Kft.
- Address: 1132 Budapest, Victor Hugo u. 18-22.
- Website: <https://www.websupport.hu/>

List of data processors (data processing activities):

- Website development and maintenance:
 - Name: Next Ship Kft.
 - Activity: Website development and maintenance.

Data We Process:

Activity Description and Purpose of Data Processing	Legal Basis	Data Processed	Duration	Registry Number
Website Visit Purpose: Ensuring the proper and quality operation of the website, monitoring and improving the quality of our services, identifying malicious visitors attacking our website, measuring website traffic, and for statistical purposes	Our company's legitimate interest	IP address time of visit data on visited sub-pages device, operating system, and browser type used location	No duration limit	Not required
Newsletter Service, Registration via Website Purpose: Communication, informing you about new promotions and new products	Consent	Last name First name Email address	Until unsubscribed from the newsletter	



We only request personal data from our website visitors if they wish to register or log in.

The personal data provided for registration and marketing services cannot be linked, and identifying our visitors is not our primary goal.

For any questions related to data processing, you may contact us at info@loxolock.com or at the mailing address of Loxolock Trade Innovation Zrt provided above, and we will respond without delay within 30 days to the contact details you have provided.

3. What are cookies, and how do we manage them?

Cookies are small data files (hereinafter: cookies) that are placed on your computer via the website and stored by your internet browser. Most commonly used internet browsers (Chrome, Firefox, etc.) accept and allow cookies by default, but you can modify your browser settings to reject or block cookies or delete stored cookies from your computer. For more information on cookies, refer to the "Help" section in each browser.

Certain cookies do not require your prior consent. Upon your first visit, our website provides a brief notification about these, which include authentication, multimedia player, load balancing, session cookies for user interface customization, and user-centered security cookies.

For cookies requiring consent — if data processing begins upon visiting the website — our company informs you upon your first visit and requests your consent.

Our company does not use or allow cookies that enable third parties to collect data without your consent.

Accepting cookies is not mandatory; however, our company is not liable if our website does not function as expected without cookie permissions.

What types of cookies do we use?

Type	Consent	Description	Purpose	Validity
1.gif	<i>not required</i>	<i>Used to count the number of sessions to the website, necessary for optimizing CMP product delivery.</i>	<i>ensures website operation</i>	<i>End of browser session</i>
CookieConsent	<i>not required</i>	<i>Stores the user's cookie consent state for the current domain</i>	<i>ensures website operation</i>	<i>1 year</i>

Third-Party Cookies:

GOOGLE:

More information on cookie types:

<https://www.google.com/policies/technologies/types/>

Privacy information: <https://www.google.com/analytics/learn/privacy.html?hl=hu>
HOTJAR:

<https://loxolock.com/>

A Loxolock Trade Innovation Zrt. weboldalakkal kapcsolatos Adatkezelési Szabályzata



GDPR compliance commitment: <https://www.hotjar.com/legal/compliance/gdpr-commitment>

4. Use of Social Media Plugins

We have included the following social media buttons on our websites:

- **Facebook Inc.**, 1601 S California Ave, Palo Alto, California 94304, USA: <https://www.facebook.com/privacy/explanation>
- **Google Inc.**, 1600 Amphitheater Parkway, Mountain View, California 94043, USA: <https://www.google.com/policies/privacy/>

5. Google analytics

Our websites are linked to Google Analytics, a service provided by Google Inc. Google uses data collected through cookies for analysis purposes.

For more information: <https://support.google.com/analytics/>

6. Data Storage

Personal data provided through newsletter subscriptions on our website (name, email address, phone number, etc.) is stored in the Mailerlite system.

The Mailerlite policy is available at the following link: <https://www.mailerlite.com/legal/data-processing-agreement>

7. What Else Should You Know About Data Processing Related to Our Website?

You voluntarily provide your personal data during registration or when communicating with our company; therefore, we ask that you ensure the accuracy, correctness, and completeness of the data you provide, as you are responsible for it. Incorrect, inaccurate, or incomplete data may hinder the provision of our services.

If you provide personal data on behalf of another person, we assume that you are authorized to do so.

You may withdraw your consent to data processing at any time without charge by:

- deleting your registration,
- withdrawing your consent to data processing, or
- requesting the withdrawal or blocking of consent for any data required for registration.

We will process the withdrawal of consent within 30 days for technical reasons. However, please note that we may continue to process certain data after consent withdrawal to fulfill legal obligations or protect our legitimate interests.

If misleading personal data is used, or if a visitor commits a crime or attacks our system, we will immediately delete the data upon terminating the visitor's registration, or, if necessary, retain it for the duration required to establish civil liability or conduct a criminal proceeding.

8. What Should You Know About Our Data Processing for Direct Marketing and Newsletter Purposes?

<https://loxolock.com/>

A Loxolock Trade Innovation Zrt. weboldalakkal kapcsolatos Adatkezelési Szabályzata



By making a declaration during registration and modifying the personal data stored on the newsletter registration interface (thus clearly expressing your consent), you authorize us to use your personal data for marketing purposes. In this case, until consent is withdrawn, we also process your data for sending newsletters, advertisements, and other informational content and offers (Grtv. 6. §).

You may withdraw your consent to receive the newsletter at any time, free of charge. Deleting your registration is always considered a withdrawal of consent. Withdrawal of consent for data processing for direct marketing and/or newsletter purposes does not automatically constitute a withdrawal of consent for other data processing related to our website.

We will process each withdrawal of consent or cancellation request within 30 days for technical reasons.

9. Other Data Processing Issues

Your data may only be transferred within the legal boundaries specified by law. For our data processors, we ensure through contractual conditions that your personal data is not used for purposes contrary to your consent. Further information can be found in Section 2.

Our company does not transfer data abroad.

Courts, prosecutors, and other authorities (e.g., police, tax authority, National Authority for Data Protection and Freedom of Information) may request information, data provision, or documents from our company. In such cases, we are obliged to comply with data provision requests to the extent strictly necessary to achieve the purpose of the request.

Our associates and employees involved in data processing are authorized to access your personal data to a predefined extent and under a confidentiality obligation.

We protect your personal data with appropriate technical and other measures to ensure data security and availability, and to guard against unauthorized access, alteration, damage, disclosure, and any other unauthorized use.

In terms of organizational measures, we monitor physical access in our buildings, continuously train our employees, and securely store paper-based documents. Our technical measures include encryption, password protection, and antivirus software. However, please note that data transmission over the internet cannot be considered fully secure. We do our best to make processes as secure as possible, but we cannot take full responsibility for data transmission over our website. We adhere to strict regulations regarding the data received by our company to ensure the security of your data and to prevent unlawful access.

For security purposes, we ask for your assistance in keeping your website access password secure and not sharing it with anyone.

10. What Are Your Rights and Remedies?

You have the following rights regarding data processing:

- **Right to information:** You may request information about data processing.



- **Right to rectification, modification, and supplementation:** You may request the rectification, modification, or supplementation of personal data we process about you.
- **Right to object and right to request deletion or restriction:** You may object to data processing and request the deletion or restriction of your data (except for mandatory data processing).
- **Right to legal remedy:** You can seek a remedy before a court.
- **Right to file a complaint with the supervisory authority:** You can file a complaint or initiate proceedings with the supervisory authority (<https://naih.hu/panaszuegyintezes-rendje.html>).

Supervisory Authority: National Authority for Data Protection and Freedom of Information

- **Headquarters:** 1125 Budapest, Szilágyi Erzsébet fasor 22/c
- **Mailing Address:** 1530 Budapest, Pf.: 5
- **Phone:** +36 (1) 391-1400
- **Fax:** +36 (1) 391-1410
- **Email:** ugyfelszolgalat@naih.hu
- **Website:** <https://naih.hu/>

Upon your request, we will provide information about:

- the data processed,
- the source of the data,
- the purpose and legal basis of data processing,
- the duration of data processing, or the criteria for determining it if the duration is not specified,
- the name, address, and activities of data processors,
- details, impacts, and corrective measures of data protection incidents, and
- the legal basis and recipients of data transfers, if applicable.

We will provide this information within 30 days of receiving the request. This information is provided free of charge unless you have already submitted a request for the same data category in the current year. In cases of unlawful data processing or if the request for information leads to a correction, we will refund any costs paid. We may only refuse to provide information in cases specified by law, indicating the legal provision and your right to seek a judicial remedy or contact the authority.

Our company will notify you and all recipients to whom the data was previously transferred for processing if there are any rectifications, restrictions, markings, or deletions of your personal data, except if notification does not infringe upon your legitimate interests.

If we deny your request for rectification, restriction, or deletion, we will provide our reasons in writing within 30 days and inform you of your right to seek judicial remedy or contact the authority.

If you object to data processing, we will investigate your objection within 30 days of receiving it and inform you in writing of our decision. If we determine that your objection is justified, we will terminate data processing (including further data collection and transfer) and restrict the data. We will notify all recipients of the



personal data affected by the objection and take measures to enforce your objection rights.

We may refuse to fulfill a request if we can demonstrate that data processing is justified by compelling legitimate grounds that override your interests, rights, and freedoms or that relate to the assertion, exercise, or defense of legal claims. If you disagree with our decision or if we fail to meet the deadline, you may bring the case to court within 30 days from the date of the decision or the last day of the deadline.

Data protection lawsuits fall under the jurisdiction of the district court and may be initiated, at the data subject's discretion, at the district court of the data subject's residence or place of stay. Foreign nationals may also file complaints with the supervisory authority of their residence.

Before filing a complaint with the supervisory authority or the court, we encourage you to contact our company to facilitate a resolution of any issues as quickly as possible.

11. What Are the Main Applicable Laws Governing Our Activities?

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data (GDPR)
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Info Act)
- Act V of 2013 on the Civil Code (Ptk.)
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (Eker Act)
- Act C of 2003 on Electronic Communications (Ehtv)
- Act CLV of 1997 on Consumer Protection (Fogyv Act)
- Act CLXV of 2013 on Complaints and Public Interest Disclosures (Pktv)
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (Grtv)

12. Modification of the Privacy Notice

Our company reserves the right to modify this Privacy Notice and will inform the affected parties appropriately. Information related to data processing will be published on the website www.loxolock.com.

Budapest, 31. October 2024