

Budapest Stock Exchange Privacy Policy

24 May 2018

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I. Introduction

It is a key objective for Budapest Stock Exchange Ltd. (BSE) to protect the personal data of natural persons and respect their right of information self-determination. Throughout its data processing, BSE pays particular attention to the compliance with the privacy regulations in force, in particular with 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 and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: the General Data Protection Regulation or GDPR).

If you have any comments about this policy, please inform us via info@bse.hu and our colleagues will contact you. BSE applies appropriate technical and organizational measures to ensure the lawfulness and security of data processing.

II. Contact and identity details of BSE as data controller

Registered Seat: 7. Szabadság square Platina Torony I. 4th floor., H-1054 Budapest

Contact: Phone: +36 1 429 6700 (available on workdays between 9 a.m. to 5. p.m.)
Email: info@bse.hu
Mail: 1364 Budapest, P.O. box .: 24.
Fax: + 36 1 429 6800

Data protection officer: György Szláma, dr (contacts: +36 1 429 6760; info@bse.hu)

III. Data processing by BSE

1. Cookies of the www.bse.hu (Website)

We use cookies to operate our Website. Cookies are small data files stored by the Website on your device suitable for web browsing and later the cookies may be read from there.

We use two types of cookies, for one, 'persistent' cookies making the usage of the Website comfortable, and on the other hand, Google Analytics cookies which serve statistic purposes.

You may delete the cookies from your device or you may disable cookies in the Privacy/History/Personal settings menu of the Tools/Settings menu of your browser.

Please note, that if Cookies are disabled, certain features of the Website may not or not operate as intended, and it may make the Website display incorrectly.

a) 'Persistent' cookies

'Persistent' cookies store information about your device and browser in order to ensure the appropriate operation of the Website's functions.

The use of user 'persistent' cookies is a legitimate interest of BSE, since BSE pays particular attention to that any investor, issuer and trader be able to access the information displayed on the Website in a readily structured form, and by these means the control of 'persistent' cookies also serve the visitors' interests. You cannot be identified by the data read from the 'persistent' cookies.

The 'persistent' cookies are erased after use, when the browser is closed.

b) 'Google Analytics' cookies

BSE collects statistic information on visitors of the Website without individually identifying the visitors by using Google Analytics cookies. These cookies distinguish the visitors of the Website and identifies their approximate geographical positions.

BSE processes the Google Analytics cookies on your consent, which may be given by the “Accept” button in the pop-up window on the Website.

The Google Analytics cookies are automatically deleted after one year. You can disable Google Analytics cookies by installing and configuring Google’s self-developed application (<http://tools.google.com/dlpage/gaoptout>). For more information about installing and uninstalling this add-on please see the help of your browser. Learn more about the Google Analytics cookies at <https://www.google.com/policies/technologies/cookies>.

2. Data processing of the persons registered on the Website

For the purpose of keeping in touch with the visitors of the Website, the Website has a registration function. If registered, BSE processes your e-mail address and username - and if provided your name - on your consent.

Registration on the Website is not allowed for persons under the age of 16, they may apply for registration via info@bse.hu e-mail address. For the registration of persons under the age of 16, the consent of the holder of parental responsibility over the child is necessary to the beginning of processing personal data by BSE. BSE provides further information about the e-mail registration process in its reply.

BSE provides information to the registered users – if requested on the Website – about stock exchange news. You may unsubscribe this information e-mail at any time after logging in on the Website at Signed in/My profile/Newsletters.

BSE process the personal data given by you on the Website to contact you in case of organizing events and preparing satisfaction surveys.

The information you provided shall be erased by BSE, if you withdraw your consent by e-mail at info@bse.hu or if you have no contact with BSE for at least two years. BSE erases the data at the latest at 31 of January of the next year after this two years term period elapsed.

In case you are attending to a BSE event, the personal data processed by BSE may be transferred to the organizers of the event.

3. Recording of incoming calls

BSE records incoming calls made through the central call system for quality assurance purposes. In case of such calls, BSE always notices you on the fact that the conversation is being recorded.

BSE may use the recordings of such calls to enforce its rights or in case of any legal disputes as proof or to subsequently prove agreements.

BSE processes the recordings of the conversations, the number of the caller, the called number and the call date.

Invitel Telekommunikation Ltd. (Invitel Távközlési Zrt.; registered seat: 8-10 Puskás Tivadar utca, Budaörs 2040) provides the telecommunication services as the data processor. The personal data is recorded and stored by the data processor. The data are saved by BSE to its systems weekly and the

saved data are simultaneously erased from the data processor's storage. If the voice recordings were not used, BSE erases them after 60 days of the making of the recording.

BSE processes your personal data on your consent. In the absence of your consent to data processing, you may not be eligible to manage your affairs on phone.

4. Data processing of contact persons and representatives of business partners

BSE stores the personal data of its business partners' representatives and traders for the purposes of keeping in touch and for identification.

BSE processes the contact persons' e-mail address and phone numbers and in case of traders of BSE's contractual partners their identity information such as address, mother's maiden name, date of birth, nationality and MiFID identifier.

The processing of personal data of the traders is mandatory in order to identify the persons accessing the exchange trading systems under the Government Decree 42/2015 (III.12) on the protection of the IT systems of financial institutions, insurance companies, reinsurers, investment firms and commodity exchange providers and under Book three of the General Terms of Service of the Budapest Stock Exchange. The processing of traders' MiFID identifiers is regulated under the Commission Delegated Regulation (EU) 2017/590 on supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities.

BSE processes the data used for contact purposes on the basis of its legitimate interests. Data processing is essential in order to BSE and its business partners meet their co-operation obligations based on the legal relationships existing between them. The processed personal data are at a low risk for the data subjects, as these are the data needed for everyday communication.

5. Contacting BSE

If you contact BSE, your personal data provided by you in your e-mail or letter will be processed by BSE on your consent. The purpose of data processing is to keeping in touch with you. Such personal data are in particular your contact details, such as your email address, address and name. BSE will erase such personal information when your consent is withdrawn or after 31 January of the year following the lapse of the limitation period (generally 5 years).

6. Contacting with you initiated by BSE

BSE processes the names, positions, e-mail addresses and possibly phone numbers of officers of BSE's potential partners in order to initiate contact with them. Information on potential partners are collected from public databases (especially Opten's corporate information) or from the public websites of the partners or other service providers. The data stored for this purpose will be erased by the BSE, if no contact is made for at least two years after the data has been recorded. BSE shall delete such data at latest at 31 January of the year following the expiration of this two years term.

7. Personal data processing regarding Kochmeister competition

If you are a participant in the Kochmeister competition, BSE will process the personal data necessary to identify the participant and verify the fulfillment conditions of the participation.

Personal data processed: name, address, telephone number, email address, university, specialization, grade, the fact that you are a PhD, postgraduate student or student of a foreign university or college.

BSE processes the data of the participants of the Kochmeister competition on consent.

BSE will process the data of the participants until the closing of the competition, but for at most to 1 year. The first three placed participants' names will be processed for 3 years after the closing of the application and will be deleted by 31 January of the year following the 3 years term. BSE will disclose the names of the first three placed participants as well as their results in the competition and the competition material on its Website.

8. Data processing related to job applications

Personal data contained in job applications submitted to the BSE will be processed by the BSE on your consent. BSE processes the job applications after giving consent to it until 31 January of the year following the closing of the given job application, in order to use the application materials in such a case if the BSE is looking for new applicants for similar position.

BSE may submit the BSE data to the Hungarian Central Bank (Magyar Nemzeti Bank Zrt., registered seat: 9 Szabadság tér, Budapest 1054) for information purposes.

BSE processes the personal data given by the applicant in the course of contacting BSE or in their application for the purpose of evaluate the application. BSE processes the data of the applicants in particular: name, e-mail address, address, phone number, qualification and professional experience.

9. Complaints handling

If you file a complaint, the personal information you provide and the complaint itself will be processed by BSE for the purpose of handling the complaint and contacting you. In the course of handling complaints, in particular, the name, address, mailing address and telephone number of the complainant are processed by the BSE.

The personal data provided during the handling of the complaint is processed by the BSE on the basis of its legitimate interests as the detection and investigation of the complaint is utterly important for BSE to provide its services at the highest possible level.

BSE pays particular attention to the confidentiality of complaints and makes all reasonable efforts to make any complaints available only to those who take part in its examination.

The personal data provided through the course of handling the complaint is erased by BSE by 31 January of the year following the lapse of the limitation period (general limitation period: 5 years). If justified, BSE may transmit the data to the competent authorities.

10. Data processing regarding whistleblowing

The abuse reporting system provides the opportunity to report to BSE any breach of law by persons employed by BSE with any legal relationship. The purpose of the data processing is to detect, eliminate and prevent any abuse by BSE employees. The data processing is necessary to comply with BSE's legal obligations set forth in Act CLXV of 2013 on complaints and public reports.

The personal data of the whistleblowers may not be disclosed without their explicit consent.

If a report of public interest is made maliciously which contains material and false information and this report causes damage or the circumstances indicating a commitment of a criminal offense or a misdemeanor, the personal data of the whistleblower will be transmitted to the competent authorities.

The content of the report may be disclosed solely to the internal auditor of BSE and to the persons involved in the investigation appointed by the internal auditor. The internal auditor stores data, facts and documents separate from her/his record keeping system, in a password-protected, separate register.

Any special categories of personal data and data of third parties not involved in the report provided by the whistleblower which are not required for the investigation and data that may not be processed under the applicable law is deleted by BSE without delay.

If the report is not well grounded or no further action is required based on the outcome of the investigation, the data contained in the report will be deleted within 60 days of the completion of the investigation, otherwise BSE will process the data until the finalization of the procedures initiated by the notification.

11. Personal data of natural persons involved in trading

Trading on BSE is subject to compliance with the strictest rules on securities secrets. Personal data of the parties of transactions are processed by BSE in the form of national client identifiers in order to comply with the transparency and reporting obligations of BSE, as set forth in Commission Regulation (EU) 2017/590. In the trading systems of the BSE, the national client identifiers are not stored, they are processed on a separate server of BSE, therefore, the data processed by the trading systems will be treated in pseudonymized form.

The identifiers of the individuals involved in the transactions are erased by the BSE by 31 January of the year following the lapse of the limitation time (general eligibility period of 5 years).

12. Xetra and MMTS II Workstation Exam

For the purpose of organizing and conducting exams for authorization to use the MMTS II Trading Workstation and the Xetra Trading Surface (hereinafter referred to as Exam), the BSE will handle your identity information if you have applied for this Exam. The legal basis for data processing is to perform the contract with you.

The data processed are: the applicants' name, place and time of birth, e-mail address, phone number.

The personal data above are processed by the BSE for an unlimited time so that a certificate can be issued at the request of the person took the Exam.

13. Personal data of shareholders

The BSE share register is managed by KELER Zrt. (1074 Budapest, Rákóczi út 70-72.) who is the data processor of the BSE regarding this activity. BSE stores a copy of the share register. The management of the share register and the personal data registered therein are processed by the BSE and KELER Zrt. under the relevant legislation, in particular according to Subsection (1) of Section 3:245 of the Hungarian Civil Code. The share register is public, anyone has access to it. BSE publishes on its website the name and the ownership of the shareholders according to Paragraph c) of Subsection (1) of Section 322 of the Act CXX on the Capital Market of 2001 (hereinafter: CPA).

Registered data in the share register according to Subsection (1) of Section 355 of the CPA:

- a) the shareholders' name, address, mother's name, and citizenship;
- b) if a share is held by more than one person, the information of the owners and their representative as set forth in Paragraph a);
- c) the code, series and par value of the shares;

- d) the type of shares;
- e) the date when the acquisition is recorded in the register of shareholders;
- f) the date of over stamping;
- g) the date when the share is retired and destroyed; and
- h) the registration number and date of the resolution of the supervisory authority related to the acquisition of the holding.

14. General Meeting of BSE

At the General Meeting of the BSE, attendance sheet and minutes are prepared, in which the names of the shareholders are recorded for identification purposes and for the documentation of the general meeting. BSE processes personal data regarding the general meeting on the basis of the provisions of the applicable laws, in particular the Act V of 2006 on company law, court proceedings and winding up. The data of the general meeting are public, they are sent to the competent court of registration.

At the General Meeting, a voice recording is also prepared, which is the basis for the minutes. Voice recordings are deleted by the BSE at the latest after one year after the general meeting has been held. The BSE has a legitimate interest in ensuring that the General Meeting is properly documented, as the substantive statements made shall be recorded in the minutes. Processing the sound recordings has a low risk for the rights and freedoms of the affected parties as the content of the minutes are public and BSE processes the voice recordings confidentially.

15. Other data processing

BSE will inform the data subjects directly of any other data processing not listed in this statement under the applicable laws. BSE may transfer the processed personal data in cases specified by law.

IV. General data transfers

BSE transfers the processed personal data – in addition to the cases specified above – to the following persons:

1. Forrai Law Firm

BSE's general agent is Forrai Law Firm in legal and compliance affairs, therefore, personal information may be transferred to the Forrai Law Firm in order to perform its duties regarding legal affairs and tasks as head of compliance.

Registered seat of Forrai Law Firm: Door 3, Floor 3, 5 Tüköry utca Budapest 1054

2. György Szláma, dr (individual entrepreneur)

BSE employs György Szláma, dr (individual entrepreneur) as data protection officer. Personal data may be transferred to the data protection officer in order to perform the data protection officer's duties, in particular, handling and examining requests regarding personal data processing.

The contact details of the Data Protection Officer can be found in Section II.

3. The Rocket Science Group LLC

In case of BSE contacting with a large number of recipients, BSE may use an e-mail service provider to get in touch with you. The e-mail service provider will receive the name, email address and position of data subjects. The e-mail service provide is the data processor of BSE, but also a data controller on its own.

E-mail service provider: Mailchimp - The Rocket Science Group LLC d / b / a MailChimp

Registered seat:

675 Ponce de Leon Avenue
Northeast, Suite 5000
Atlanta, GA 30308
United States

For more information of the data processing of the data processor please visit https://mailchimp.com/legal/privacy/?_ga=2.25123068.713481184.1526988416-1148478313.1525880883.

V. Rights of the data subjects

You have the right – as data subject – to request the erasure, restriction or rectification of your personal data, to receive information about or access to your personal data, to object to the data processing or request the transfer of data. The rights of the data subjects may be exercised by written requests sent to BSE's contact address specified in Section II. BSE provides information to the data subjects in the same manner the request was made by them. In case of any request regarding the rights of data subjects, BSE shall take actions and provide information on the request and the measures taken within one month of the request, which deadline may be extended by 2 months if necessary due to the complexity or the large number of requests. BSE will respond free of charge to data subjects' requests, unless the request is manifestly unfounded or excessive (e.g. a mass request for the same data), in which case the BSE may charge a reasonable fee or refuse to act on the request.

1. Right to get informed

BSE ensures to inform the data subjects about the process of personal data specified in Article 13 of the GDPR in the manner specified in the regulation (in a concise, transparent, intelligible and easily accessible form, using clear and plain language).

2. Right to access

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, access to the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;

h) the existence of automated decision-making, including profiling, and information for at least about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;

j) providing a copy of the processed personal data for the data subject.

3. Right to rectification

The data subject has the right that upon his or her request BSE rectify or complete the inaccurate or incomplete personal data concerning the data subject.

4. Right to erasure

The data subject has the right that upon his or her request the data controller erase the personal data concerning him or her without undue delay, if one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes specified hereinabove;
- b) the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with the applicable laws;
- f) the personal data have been collected in relation to the offer of information society services.

5. Right to restriction of processing

The data subject has the right that upon his or her request the data controller restrict the processing personal data concerning him or her, if one of the following grounds applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the 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 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 defense of legal claims and the data subject requests the restriction of processing; or
- d) the data subject has objected to processing not based on his or her consent; in which case the restriction shall last until the verification whether the legitimate grounds of the 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 defense 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.

6. Right to data portability

The data subject has the right that upon his or her request the data controller transmit the processed personal data concerning him or her to another data controller (specifying the contact data of the other controller) in Microsoft excel file format.

7. Right to withdrawal

The data subject has the right to withdraw his or her consent regarding the process of personal data at any time, however, the withdrawal shall not affect the lawfulness of the data processing prior to such revocation.

8. Right to object to processing of personal data

The data subject has the right to object to the processing of personal data, if such processing is based on other legal grounds than the data subject's consent or performing contractual obligations.

If the objection is justified, the controller shall no longer process the personal data and erase the data or upon the data subject's request restrict their processing 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 defense of legal claims.

Where personal data are processed for direct marketing purposes, upon objection, BSE shall no longer process the data involved in the objection.

9. Damages

Data subjects are eligible for compensation who suffers damages as a result of an infringement of the relevant laws by the data controller or processor and it is imputable to the infringing person.

10. Right to remedy

If you have any comments or concerns regarding the data processing of BSE, please contact the Data Protection Officer specified in Section II with confidence.

In the event of infringement of the data subject's rights, the person concerned is entitled to file a high priority case at court.

In addition to the above, you can file a complaint at the National Privacy and Information Authority (registered seat: 22 / c Erzsébet Szilágyi fasor, Budapest 1125, postal address: 5 P.O. box, Budapest 1530, phone: +36 (1) 391-1400, e-mail: ugyfelszolgalat@naih.hu) as well.