



PRIVACY NOTICE

in connection with the processing of the personal data of customers, partners, and users of the HelloPay Website, HelloPay Card and HelloPay Application

HelloPay Informatikai és Szolgáltató Zártkörűen Működő Részvénytársaság (registered office: 1037 Budapest, Montevideo str. 10.; company registration number 01-10-048364, registered in the Commercial Register of the Budapest General Court; tax number: 25155781-2-41, represented by Norbert Varga, CEO, e-mail address: dpo@hellopay.hu; hereinafter referred to as **"HelloPay"** or the **"Data Controller"**) hereby informs the data subjects about the processing of their personal data in connection with the use and application of the HelloPay website, HelloPay card and HelloPay app as well as during customer and partner relations involving HelloPay products and services, in accordance with Regulation 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter referred to as GDPR).

Capitalized terms used in this Privacy Notice have the same meaning as the same terms used in the HelloPay GTC.

The personal scope of the present Privacy Notice covers all personal data processing activities concerning potential HelloPay customers, partners with whom HelloPay has a business contract in force (**"Partners"**), employees of Partners, visitors to the HelloPay Website, users of the HelloPay App and Card (the persons in this paragraph hereafter collectively referred to as **"data subjects"**).

HelloPay may unilaterally amend this Privacy Notice at any time. This Privacy Notice is published on the HelloPay website and is also available in the HelloPay app. This Privacy Notice shall enter into force upon its publication.

In case of discrepancies between the Hungarian original version of the Privacy Notice and this English version, the Hungarian language version prevails.

HelloPay's data protection officer is Bea Csabai, contact details: e-mail: dpo@hellopay.hu; postal address: 1037 Budapest, Montevideo str.10

1. What personal data do we manage, for how long, for what purposes and by what authorization?

The legal bases for our data processing are the following:

- a) GDPR Article 6 (1) a) where the processing is based on the informed consent of the data subject (hereafter referred to as **Consent**);

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- b) GDPR Article 6 (1) b), on where processing is necessary for the performance of a contract to which the data subject is party (hereafter referred to as **Performance of Contract**);
- c) GDPR Article 6 (1) c) where data processing is necessary for the fulfilment of or compliance with a legal obligation of the data controller (e.g. obligations regarding accounting, bookkeeping - hereafter referred to as **Legal Obligation**);
- d) GDPR Article 6 (1) f) where data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, (hereinafter referred to as: **Legitimate Interest**).

Upon request, the data subject is entitled to receive the legitimate interest balancing test concerning the data processing based on legitimate interest. The request must be submitted in an e-mail sent to the below customer service email address.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

The legal basis for the data processing is specified below, per data categories and by reference to the elements of the above list.



1.1. Contact request through Website

The data subject sends a message to HelloPay via the form on the HelloPay Website to request information, request an offer, make a suggestion or otherwise in connection with HelloPay services.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Potential customer, Customer, Contact person / representative person of Partner, Employee of a Partner, Visitor of Website, User of HelloPay App	name, e-mail address, telephone number, date and time of receipt of the message, the content of the message and other personal data contained therein	From the data subject	Fulfilling of requests of information, answering suggestions or messages with other content by HelloPay.	Consent of the data subject under GDPR Article 6 (1) a)	The first day of the quarter following the first response to the contact request (for example, the date of deletion of a request responded to on 1 January 2024 is 1 April 2024).

The data subject has the right to withdraw his/her consent at any time.

1.2. Data processing relating to Customer service

Data subjects can request clarification and information and make suggestions about HelloPay services through HelloPay customer service, which is available in person and by e-mail and telephone.

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Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Potential customer, Customer, Contact person / representative person of Partner, Employee of a Partner, Visitor of Website, User of HelloPay App	name, e-mail address, telephone number, the content of the message and other personal data contained therein	From the data subject	Fulfilling of requests of information, answering suggestions or other questions regarding HelloPay services in person or via e-mail.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	The first day of the quarter following the first response to the contact request (for example, the date of deletion of a request responded to on 1 January 2024 is 1 April 2024).
	recording of phone call (only in case of telephone helpdesk)	From the data subject	Ensuring the quality of work of HelloPay customer service staff, monitoring the quality of the customer service provided by HelloPay, and the submission, enforcement and defence of legal claims by HelloPay.	Consent of the data subject under GDPR Article 6 (1) a).	One year after the receipt of the request by the customer service.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data. The right to privacy is not violated when making an audio recording of a phone call, as the data subject is informed of the audio recording at the beginning of the call, before the call is made, and has the choice to continue or terminate the call. In addition to the telephone helpdesk, the e-mail helpdesk offers the same service and solution, i.e. the data subject has the choice to investigate or report his/her complaint, make a request and have it dealt with.

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1.3. Handling consumer complaints

The data subject acting as a consumer may lodge a consumer complaint regarding HelloPay's services in person or by e-mail in accordance with Act CLV of 1997 on Consumer Protection ("Consumer Protection Act").

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Data subjects acting as consumers	name, e-mail address, telephone number, the content of the message and other personal data contained therein	From the data subject	Recording, investigating and responding to complaints received and maintaining the necessary contacts.	Fulfilment of legal obligation of HelloPay - GDPR Article 6 (1) c). The legal obligation: Section 17/A (5) of the Consumer Protection Act stipulates the mandatory elements of the minutes of complaints.	HelloPay retains the record of the complaint and a copy of the response for 3 years under Section 17/A (7) of the Consumer Protection Act.

1.4. Processing of contact persons' data

HelloPay's potential Customers, Partners, employees of Partners are in continuous and regular contact with HelloPay in connection with the conclusion, performance, settlement, invoicing, monitoring and other issues related to the provision of the service in the context of the contracts concluded with HelloPay and service provision.



Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Contact persons of potential HelloPay customers, of Customers, of Partners, employees of Partners, self-employed Partners	name, e-mail address, phone number, name of the potential Customer / Partner undertaking	From potential Customer, Customer, Partner, or directly from Subject	General correspondence necessary for the conclusion, performance and provision of contracts and services.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	HelloPay retains the data for 5 years following the failure to conclude a contract / termination of a contract under Section 6:22 (1) of Act V of 2013 on the Civil Code ("Civil Code").
Individual entrepreneur partners	name, address, tax number, EV number, bank account number, the fact and content of the Individual Contract with HelloPay or the intention to enter into an Individual Contract	From the data subject	HelloPay forwards to its parent company, SimplePay Plc. and OTP Bank Plc. the listed information on the self-employed Merchant for the purpose of comparing it with the merchant data in its own portfolio, in order to exploit synergies of sales cooperation opportunities within the banking group.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	Until the termination of the contract with the data subject.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

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1.5. Fault and damage reports, on-site assistance

HelloPay Partners, Partners' employees may report any damage to the terminal or errors by phone or e-mail, which will be rectified by HelloPay. HelloPay will document the steps taken to rectify the report or fault in a protocol and, in the event of an on-site visit, will issue a worksheet, which must be signed on the spot by the Partner's representative.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Contact person, employee of Partner	name, phone number, signature, e-mail address	From the data subject	Troubleshooting and documentation of the fault, terminal failure, and related communication.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	HelloPay retains the data for 5 years following the rectification of the fault or terminal failure, under Section 6:22 (1) of the Civil Code.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

1.6. Allocation of tips to Partners' employees (e.g. waiters)

Partners and their employees have the option to receive the tips given to the employees through HelloPay via bank transfer from HelloPay.



Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Employees of Partners (e.g. waiters)	name, place and date of birth, mother's maiden name, address, name of the bank holding the account, bank account number, e-mail address, In case of Direct Pooled Tipping, the weight factors and working hours.	From the data subject except in the case of selecting the Direct Collected Tip option, where the weight factors and working hours are submitted by the Partner	Transfer of tips	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	HelloPay retains the data until consent is withdrawn, or for 5 years following the termination of the contract concluded with the Partner, under Section 6:22 (1) of the Civil Code. HelloPay retains data forming part of the accounting documents for 8 years under Section 169 (2) of Act C of 2000 on Accounting ("Accounting Act").

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

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1.7. Processing data of other merchants contracted with the Main Organiser Partner

For larger events, the Partner (main organiser) contracts HelloPay, who later settles with the other merchants who have a contract with the Partner. In such cases, HelloPay manages the merchants' data (e.g. contact details) in its admin system for the sole purpose of providing the service (e.g. troubleshooting).

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Merchant contact persons	name, address, number, e-mail, phone	From Partner	"In the case of event organisation, communication regarding organizational and performance issues related to service provision, and necessary troubleshooting.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	HelloPay retains the data for 5 years following the termination of the contract concluded with the Partner, under Section 6:22 (1) of the Civil Code.

The data subject has a right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

1.8. Operating the HelloPay App and registration to the HelloPay App

Once registered in the HelloPay App, the user can track their HelloPay card spending, HelloPay card balance.



Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
User registered to the HelloPay App	name, email address, phone number, gender, date of birth HelloPay card number, balance	From the data subject	Using the HelloPay App	Performance of the contract concluded between HelloPay and the card holder - GDPR Article 6 (1) b).	5 years following the deletion of the user profile, under Section 6:22 (1) of the Civil Code.

1.9. HelloPay card administration (registration, card order, card balance upload and retrieval)

The HelloPay card provides users with secure and efficient payment at HelloPay acceptance points. The purpose of data processing is to administer the transactions associated with the HelloPay card and to enable the user to order a HelloPay card and be informed of the balance on his HelloPay card.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
HelloPay cardholder	name, email address, phone number, date of birth, gender, HelloPay card number, time, place, amount of HelloPay card purchase and top-up transactions, HelloPay card balance, date of transaction.	From the data subject	Recording and tracking of HelloPay card transactions, and provision of queries by the HelloPay cardholder	Performance of the contract concluded between HelloPay and the card holder - GDPR Article 6 (1) b)	Until the deletion of the HelloPay user profile.

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1.10. Billing for natural person customers after top-up of HelloPay card

If the cardholder customer tops up the HelloPay card, there is a 2% fee for this top-up, which is charged to the user by HelloPay.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
HelloPay cardholder	address, city, country (optional), postcode, name, e-mail address, tax identification number (optional)	From the data subject	Compliance with legal obligation	<p>To comply with HelloPay's legal obligation under Article 6(1)(c) of the GDPR.</p> <p>The legal obligation: the obligations set out in Act CXXXVII of 2007 on Value Added Tax ("VAT Act") and the Accounting Act.</p>	<p>HelloPay retains data forming part of the accounting documents for 8 years under Section 169 (2) of the Accounting Act.</p> <p>HelloPay retains the documents under the scope of the VAT Act for 3 years following the issuing of the receipt under Section 179 of the VAT Act.</p>

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1.11. Checking eligibility eligibility for student discount

HelloPay offers discounts to students, which can be claimed after verification of eligibility.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Users wishing to claim the student discount	name, e-mail address, telephone number, date of birth, gender, student ID number, expiry date	From the data subject	Verification of eligibility	HelloPay's legitimate interest under Article 6(1)(f) GDPR	Until the deletion of the user profile, except for the student ID number, which is retained by HelloPay for 5 years following the deletion of the student ID number from the user profile, under Section 6:22 (1) of the Civil Code, or for 5 years following the deletion of the user profile.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

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1.12. Sending marketing messages

HelloPay sends marketing messages about its services to subscribers.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Users registered in the HelloPay App Contact details of contracted or potential Merchants	name, e-mail address, phone number for HelloPay App users, gender	From the data subject	Promote HelloPay services by sending direct marketing messages.	Consent of the data subject under GDPR Article 6 (1) a).	Until consent is withdrawn.

The data subject has the right to withdraw his/her consent at any time.

1.13 Data processing related to questionnaire surveys

HelloPay may organize questionnaire-based surveys in order to obtain opinions and feedback regarding HelloPay and the services provided by HelloPay, and in this context may (i) send questionnaires by e-mail to individuals using its services who have subscribed to receive direct marketing messages, including the contact persons and employees (waiters) of the Partners, or (ii) display questionnaires on the interfaces of the terminals provided by it. HelloPay processes the personal data of the data subjects in connection with the questionnaire survey and their responses in the following manner:

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Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Partner's contact person or employee of the Partner who subscribed to direct marketing messages	Name, email address, answers to questions in the questionnaire	From the data subject	Collecting opinions and feedback on HelloPay's services, sending gifts for participating in questionnaire surveys.	Article 6(1)(f) of the GDPR: the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.	The first day of the quarter following the year in which the questionnaire was completed (for example, the date of deletion for a request answered on January 1, 2024, would be April 1, 2024).

In the case of data processing based on legitimate interest, the data subject may object to the data processing at any time, in which case HelloPay will no longer process their data.

1.14. Data processing concerning prize games, promotional games

A	B	C	D	E	F
Subject	Data Category	Data origin	Purpose of data processing	Legal basis of data processing	Duration of data processing
Persons participating in the promotion	name	From Subject	Participation in a promotion or prize game, Communication, Notification of the participant about the result, Participant identification	If participation in the promotion is subject to an application or registration in the promotion: consent pursuant to Article 6(1)(a) of the GDPR	90 days after the draw date. In case of consent: until the withdrawal of consent, if sooner than the above processing period.
	e-mail address	From Subject	Participation in a promotion or prize game, Communication, Notification of the participant about the result,		

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			participant identification	If participation in the promotion is automatic by making a purchase and is not subject to a separate application or registration in the game: GDPR Article 6(1)(f): legitimate interest.	
	phone number	From Subject	Participation in a promotion or prize game Notification of the participant about the result, participant identification		
	Name of employer business*	From Subject	Participation in a promotion or prize game		

Data marked with * are mandatory to fill in only for waiters, without these data it is not possible to participate in the prize game, promotion. Data controller is Simple.

The participant may withdraw their consent at any time. In case of withdrawal of the consent, it is not possible to process their data in the game, therefore the player cannot take part in the game.

The Player (data subject) may object to the processing of data based on the above legitimate interest by sending an e-mail dpo@hellopay.hu.

Processing personal data of the winners

Beyond the mandatory data indicated in section 1.14 herein the winning participant must provide further data for the purpose of taking over of the prizes, of the payment and report of the taxes and other common charges as well as of issuing tax certificate:

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A	B	C	D	E	F
Subject	Data Category	Data origin	Purpose of data processing	Legal basis of data processing	Duration of data processing
Winner	Mailing address (if it differs from living address)	From Subject	Taking over of the prize	GDPR Article 6 (1) b) Fulfilment of a contract	After 5 years from the end of the promotion
	tax ID	From Subject	Fulfilment of taxation obligations	GDPR Article 6 (1) c) Legal obligation	If the data are necessary for the fulfilment of tax obligations, they will be stored for 5 years calculated from the last year from that calendar year in which the tax should have been reported or in the lack of reporting in which the tax should have been paid.
	Place and date of birth	From Subject	Taking over of the prize, identification of the winner	GDPR Article 6 (1) b) Fulfilment of a contract	
	Number of ID card	From Subject	a) Taking over of the prize, identification of the winner	GDPR Article 6 (1) b) Fulfilment of a contract	
	Mother's name	From Subject	a) Taking over of the prize, identification of the winner b) Fulfilment of taxation obligations	In case of data processing purpose in column D point a): GDPR Article 6 (1) b) Fulfilment of a contract In case of data processing purpose in column D point b): GDPR Article 6 (1) c) Legal obligation	If the data are necessary for the fulfilment of the accounting obligations, retention period is 8 years. In any other case the data shall be stored for 5 years after the termination of the registration (general term of statute of limitation).

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Winner	Video and sound recording	From Subject	Use for marketing purposes in order to promote the activity and services of HelloPay	GDPR Article 6 (1) a) - consent	Until withdrawal of consent
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Data marked with * are mandatory to fill in, without these data it is not possible to take over the prize, providing of those data is the condition of taking over of the prize.

HelloPay publishes the video and sound recording of the winner on the websites operated by HelloPay, which means www.simple.hu website, HelloPay's Facebook page and LinkedIn page. Consent covers taking the recordings and the use of the recordings according to this section.

The winner may withdraw their consent in an e-mail sent to dpo@hellopay.hu.

Data controller is HelloPay.

Processing the data in case of taking over of the prize by a proxy

A	B	C	D	E	F
Subject	Data Category	Data origin	Purpose of data processing	Legal basis of data processing	Duration of data processing
Winner	Name*	From Subject	Identification of the proxy taking over the prize	GDPR Article 6 (1) f) Legitimate interest	After 3 months from the end of the promotion
	Place and date of birth*	From Subject	Identification of the proxy taking over the prize	GDPR Article 6 (1) f) Legitimate interest	
	Number of ID card*	From Subject	Identification of the proxy taking over the prize	GDPR Article 6 (1) f) Legitimate interest	

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	Address*	From Subject	Identification of the proxy taking over the prize	GDPR Article 6 (1) f Legitimate interest	
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Data marked with * are mandatory to fill in, without these data it is not possible to take over the prize, providing of those data is the condition of taking over of the prize.

Presentation of legitimate interest: ensuring the lawful taking over of the prize to the proxy. Processing of the data of the proxy for taking over the prize is the legitimate interest of HelloPay and the winner. Categories of data processed is narrow, it covers just data necessary for identification, so the fundamental rights and freedoms of proxies are not violated.

Data controller is HelloPay.

The data subject is entitled to object to the data processing based on the aforementioned legitimate interest in an e-mail sent dpo@hellopay.hu.

The User is entitled to receive the legitimate interest balancing tests concerning the aforementioned data processing based on legitimate interest upon request by submitting their request in an e-mail to dpo@hellopay.hu.

Processing the data of the witnesses of the proxies

A	B	C	D	E	F
Subject	Data Category	Data origin	Purpose of data processing	Legal basis of data processing	Duration of data processing
Winner	Name*	From Subject	Identification of the proxy taking over the prize	GDPR Article 6 (1) f Legitimate interest	After 3 months from the end of the promotion
	Address*	From Subject	Identification of the proxy taking over the prize	GDPR Article 6 (1) f Legitimate interest	

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Data marked with * are mandatory to fill in, without these data it is not possible to take over the prize, providing of those data is the condition of taking over of the prize.

Presentation of legitimate interest: ensuring the lawful taking over of the prize to the proxy. Processing of the data of the proxy for taking over the prize is the legitimate interest of HelloPay, the proxy and the winner. Categories of data processed is narrow, it covers just data necessary for identification, so the fundamental rights and freedoms of witnesses are not violated.

Data controller is HelloPay.

The data subject is entitled to object to the data processing based on the aforementioned legitimate interest in an e-mail sent dpo@hellopay.hu.

The User is entitled to receive the legitimate interest balancing tests concerning the aforementioned data processing based on legitimate interest upon request by submitting their request in an e-mail to dpo@hellopay.hu.

1.15. Data processing related to the provision of the WeChat Pay service

In the course of providing the WeChat Pay service, HelloPay processes the personal data of merchants, sole proprietor merchants, and natural person buyers using the WeChat Pay service, as set out in this section.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Contracted or potential Merchants	name, address, number e-mail phone	From the data subject	Contact and administration related to the contract concerning the WeChat Pay Service.	Article 6(1)(f) of the GDPR: the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.	If the data is included in documents required for fulfilling tax obligations, it will be stored and retained for 5 years from the last day of the calendar year in which the tax return, data reporting, or

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Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
					notification should have been submitted, or-if no such submission was made-from the year in which the tax should have been paid.
Sole trader merchants contracted with HelloPay for the WeChat Pay Service	Name, registered address, email address, phone number, scope of activity (MCC classification), store address, category.	from the Data subject	Conclusion and performance of a contract, as well as the necessary related communication	Article 6(1)(b) of the GDPR: performance of a contract or steps prior to entering into a contract.	If the data is included in documents required for fulfilling tax obligations, it will be stored and retained for 5 years from the last day of the calendar year in which the tax return, data reporting, or notification should have been submitted, or-if no such submission was made-from the year in which the tax should have been paid.
	Mother's name, place and date of birth, sole trader registration number and tax number		Conclusion and performance of a contract,		
	Merchant ID	HelloPay	Settlement based on the contract and identification of the merchant		
	Mobile Device identifier	from the Data subject	Settlement based on the contract		
					If the data is included in the contract concluded with the contracted merchant, it will be retained and stored for 8 years from the termination of the contract for the purpose

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Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
					of fulfilling accounting obligations.

During the WeChat Pay payment made by the Buyer in the Merchant's store, HelloPay processes the transactional data provided by the Buyer and received from the Merchant as a data processor, based on a data processing agreement concluded with the Merchant. HelloPay, as a data processor, processes the following personal data of natural person buyers who pay via the WeChat Pay Service in connection with the payment:

Nature and Purpose of Data Processing Activity Category of Data Processed	Category of data processed
Execution of WeChat Pay payment transaction	Transaction amount
	Transaction date, time, and identifier
	Buyer's (bank account holder's) bank account number and name

With regard to the above data, the Merchant qualifies as the data controller, and the Merchant's privacy notice specifies the purposes, legal bases, and retention periods for which the Merchant uses such Buyer data. HelloPay processes the above data as a data processor, based on the instructions of the Merchant, for the purposes, on the legal bases, and for the duration determined by the Merchant, and does not use this data for its own purposes.

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1.16. Data processing related to AMEX card payments

1.16.1 In the case of payments made with an American Express (AMEX) bank card, HelloPay, as data controller, processes the following data in connection with customer identification and customer authentication of merchants and their representatives for AMEX, in accordance with anti-money laundering legislation:

Data subject	Type of data	Purpose of data processing	Legal basis of data processing	Duration of data processing
In the case of Merchants contracted for AMEX card acceptance: sole proprietors, individual companies, primary agricultural producers, VAT-registered private individuals, individual attorneys-at-law, notaries	family name and given name, family name and given name at birth, place and date of birth, mother's name at birth, type and number of identity document, address or place of residence, number of address card, citizenship, nature and extent of ownership interest, politically exposed person status, source of funds and wealth, tax number, main activity, registration number, signature, date and time of recording the data, the fact that an authority, court, prosecutor's office, supervisory authority or the data controller has submitted a notification of discrepancy from the data recorded in the beneficial ownership register Scope of data processed in relation to the source of funds and wealth:	Personal and customer identification, customer due diligence, making copies of documents presented for customer identification	Article 6(1)(f) of the GDPR: the processing is necessary for the purposes of the legitimate interests pursued by AMEX	10 years from the termination of the contract

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Data subject	Type of data	Purpose of data processing	Legal basis of data processing	Duration of data processing
<p>public, physicians with an independent practice right, representatives of companies, declarants of companies, beneficial owners of companies, persons authorised to sign on behalf of companies, proxies acting on behalf of companies and their witnesses, company contact</p>	<p>in the value of at least HUF 3 million, indicating separately for each defined asset group the magnitude categories corresponding to the aggregate value estimated by the customer: Ownership of real estate (including partial ownership) Motor vehicle Other high-value movable property Intangible assets and assets with proprietary value, including in particular the right to use intellectual property and leasehold rights Claims on credit institution accounts, securities, other funds and virtual currency Cash Estimated market value of ownership interest in a business association Statement on liabilities Statement on income Name and position of the person making the declaration and authorised to</p>			

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Data subject	Type of data	Purpose of data processing	Legal basis of data processing	Duration of data processing
persons, delivery agents	represent, in the case of a legal person or an organisation without legal personality			
	<p>In the case of a beneficial owner who is a politically exposed person, a close relative of a politically exposed person or a person known to be a close associate of a politically exposed person: whether the person qualifies as a politically exposed person, a close relative of a politically exposed person or a person known to be a close associate of a politically exposed person.</p> <p>If yes, the point of the AML Act under which the person qualifies as a politically exposed person.</p>	Determining whether the beneficial owner qualifies as a politically exposed person, a close relative of a politically exposed person or a person known to be a close associate of a politically exposed person, and recording a declaration	Article 6(1)(f) of the GDPR: the processing is necessary for the purposes of the legitimate interests pursued by AMEX	10 years from the termination of the contract

In the case of data processing based on legitimate interest, the data subject may object to the data processing at any time; in such case, HelloPay will no longer process their data.

Presentation of legitimate interest: The legitimate interest of American Express Payments Europe S.L. (AMEX), which performs AMEX card acceptance based on a payment services authorisation, is to comply with the customer identification and customer authentication obligations mandatorily imposed on it by the applicable European Union and Spanish laws on the prevention of money laundering and terrorist financing, including compliance with legal obligations relating to beneficial owners and politically exposed persons. AMEX is the direct addressee of these legal obligations and uses

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HelloPay for their fulfilment under the agency and payment services agreement concluded between AMEX and HelloPay for this purpose. HelloPay carries out the above data processing in the legitimate interest of AMEX.

1.16.2. Data processing relating to persons paying with an AMEX card

Data subject	Type of data	Purpose of data processing	Legal basis of data processing	Duration of data processing
AMEX cardholder, party paying with an AMEX card	<p>Cardholder's name (not processed in the case of POS transactions; processed in the case of MOTO transactions)</p> <p>Card number</p> <p>Card expiry date</p> <p>Service code</p> <p>Card CVV/CVC2 code</p> <p>Data stored on the card's magnetic stripe and chip</p> <p>Card PIN and PIN block</p>	Execution of card payment	Article 6(1)(f) of the GDPR: legitimate interests of AMEX, HelloPay and the Merchant	<p>If the data are included in documents required for fulfilling tax obligations, they will be stored and retained for 5 years from the last day of the calendar year in which the tax return, data reporting or notification should have been submitted or, in the absence of a tax return, data reporting or notification, in which the tax should have been paid.</p> <p>If the data are necessary for fulfilling accounting obligations, they will be</p>

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Data subject	Type of data	Purpose of data processing	Legal basis of data processing	Duration of data processing
				retained and stored for 8 years. In other cases, the data will be retained for 5 years (general civil law limitation period). Retention period for the card CVV/CVC2 code, data stored on the card's magnetic stripe and chip, card PIN and PIN block: until completion of the payment transaction.

In the case of data processing based on legitimate interest, the data subject may object to the data processing at any time; in such case, HelloPay will no longer process their data.

Presentation of legitimate interest: The legitimate interest of American Express Payments Europe S.L. (AMEX), which performs AMEX card acceptance based on a payment services authorisation, is that payment transactions initiated with an AMEX card are executed by AMEX using HelloPay. HelloPay's legitimate interest is to perform its contract concluded with AMEX by participating in the execution of these payment transactions. The Merchant's legitimate interest is to receive, through HelloPay, from AMEX the amount of payments initiated at the Merchant with an AMEX card.

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2. Data transfers

2.1. Data processors

For the processing and storage of personal data of contact persons and representatives, we use various companies with whom we have concluded a data processing agreements. The following processors process personal data:

Data processors' name and address	Data processing activity	Information regarding data transfers to abroad
Eldacon Kft. (registered seat: 1094 Budapest, Tűzoltó street 57.; e-mail: gdpr@eldacon.hu / support@eldacon.hu)	HelloPay Website operation	-
Amazon Web Services EMEA SARL (AWS) (registered seat: 38 Avenue John F. Kennedy, L-1855 Luxembourg; e-mail: aws-EU-privacy@amazon.com)	HelloPay Website hosting service	-
MiniCRM Kft. (registered seat: 1075 Budapest, Madách Imre way 14.; e-mail: help@minicrm.hu)	CRM database provision and management Sending newsletters, marketing messages Providing and managing forms for prize and promotional games	-
Progen Kft. (registered seat: 1118 Budapest, Homonna street 8/A ; e-mail: info@progen.hu)	Operating of a business management software	-
Microsoft Corporation (USA - One Microsoft Way Redmond, Washington 98052)	Office 365 service SharePoint Teams, Microsoft Forms	Yes, data is transferred to the USA. Legal basis of transfer: European Commission adequacy decision on the EU-US data protection framework.
SimplePay Plc. (1138 Budapest, Váci út 135-139. B. ép. 5. em.)	Supporting marketing activity, business activity and IT security	-

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OTP Bank Plc. (registered seat: 1051 Budapest, Nádor street 16.)	Accounting activity	-
Opennetworks Kft. (registered seat: 1125 Budapest, Kiss Áron street 9.; e-mail: info@opennet.hu)	Fixed telephony, virtual switchboard services, recording and storage of telephone conversations related to customer service activities	-
Brandocs Solutions Kft. (registered seat: 2030 Érd, Moha street 4., e-mail: https://brandocs.hu/home/kapcsolat/)	Operation of integrated bid management software, related support and tracking services	-
Nordhanger Kft. (registered seat: 1013 Budapest, Attila út 2. B. lház 5. em. 8. ajtó)	System administrator services, IT security services related to Microsoft O365 services.	-
Titanium Venture Kft. (registered seat: 1121 Budapest, Kútvölgyi út 101/A 1. em.)	Business development, business management and related IT consultancy services, commercial agency activities.	-
Evolution Consulting Kft. (registered seat: 3515 Miskolc-Egyetemváros, AFKI ép. 2. em.)	Operation of the HRMaster software for managing working time records, vacation planning, and facilitating remote work.	-
Udemx Kft. (registered seat: 6720 Szeged, Dugonics tér 11. 3. em 26. ajtó)	Providing access to download the WeChat Pay mobile application.	-

2.3. Other data transfer

HelloPay conducts the following data transfers:

Recipient of data transfer	Purpose of data transfer	Information regarding data transfers to abroad
Quantum Diákmunka Iskolaszövetkezet (2161 Csomád, Kossuth Lajos út 103.)	Provision of employment through a school cooperative.	-

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<p>SimplePay Plc. (1138 Budapest, Váci way 135-139. B. ép. 5. em.) OTP Bank Nyrt. (1051 Budapest, Nádor u. 16.)</p>	<p>HelloPay forwards to its parent company, SimplePay Plc.. and OTP Bank Nyrt. the listed information on the individual Merchant for the purpose of comparing it with the merchant data in its own portfolio, in order to exploit synergies of sales cooperation opportunities within the banking group.</p>	<p>-</p>
<p>Oktatási Hivatal (1055 Budapest, Szalay street 10-14.; e-mail: adatvedelem@oh.gov.hu / info@diakigazolva.ny.hu)</p>	<p>Check the validity period of your student card</p>	<p>-</p>
<p>WeChat Pay Europe B.V. (Buitenveldertselaan 5, 1082VA, Amsterdam, Netherlands)</p>	<p>Providing the WeChat Pay service</p>	<p>WeChat Pay Europe B.V. transfers the data to its parent company, Tenpay Payment Technology Co., Ltd., a payment service provider, and to Tencent Holdings Ltd., which provides the WeChat mobile application, in the People's Republic of China. Further details on the data transfer are available at: https://payapp.weixin.qq.com/summary/gdpr/home?lang=en&nobutton=1</p>
<p>Ernst & Young Könyvvizsgáló Kft. HU-1132 Budapest, Váci way 20.</p>	<p>Accounting activity</p>	<p>-</p>
<p>CMS Hungarian Branch Office and Ormai, Papp, Czike and Partners Cameron McKenna Nabarro Olswang LLP. Law Firm</p>	<p>Legal services</p>	<p>-</p>

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(1053 Budapest, Károlyi street 12.)		
American Express Payments Europe S.L. (Av. Del Partenón, 12-14 Campo de las Naciones, 28042 Madrid, Spain)	AMEX card acceptance	-

3. HelloPay App users under the age of 16

If a person under the age of 16 registers to use the HelloPay App, the consent of a legal guardian is required for registration.

4. Use of Cookies

For more information about cookies used on the HelloPay Website, please refer to the HelloPay Cookie Notice, available here: www.hellopay.hu.

5. Rights of the data subjects

The data subjects' rights and remedies are set out in detail in the relevant provisions of the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80 and 82 of the GDPR). The following summary sets out the most important provisions and the Data Controller provides information to data subjects on their rights and remedies in relation to data processing accordingly.

The information must be provided in writing or by other means, including electronic means where appropriate. Information may also be provided verbally at the request of the data subject, provided that the identity of the data subject has been verified by other means.

The Data Controller shall inform the data subject of the measures taken in response to his or her request without undue delay and in any event within one month of receipt of the data subject's request (see Articles 15 to 22 GDPR). If necessary and taking into account the complexity of the request and the number of requests, this period may be extended by a further two months. The Data Controller shall inform the data subject of the extension of the time limit, stating the reasons for the delay, within one month of receipt of the request. Where the data subject has made the request by electronic means, the information shall, where possible, be provided by electronic means, unless the data subject requests otherwise.

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If the Data Controller does not act on the data subject's request, the Data Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

5.1. The data subject's right of access

- (1) The data subject has the right to obtain confirmation from the Data Controller whether or not personal data concerning him/her are being processed. Where the case is such, then he/she is entitled to have access to the personal data concerned and 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 including especially recipients in third countries and/or international organisations;
 - 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 right of the data subject to request from the Data 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) whether automated decision making (Article 22 (1) and (4) of the GDPR) is applied including profiling, and in such case, at least information in comprehensible form about the applied logic and the significance of such data processing and the expectable consequences it may lead to for the data subject.
- (2) Where personal data are forwarded to a third country, the data subject is entitled to obtain information concerning the adequate guarantees of the data transfer.
- (3) The Data Controller provides a copy of the personal data undergoing processing to the data subject. The Data Controller may charge a reasonable fee based on administrative costs for requested further copies. Where the data subject submitted his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless otherwise requested by the data subject.



5.2. The right to rectification

The data subject shall have the right to obtain from the Data Controller, at the data subject's request and without undue delay, the rectification of inaccurate personal data relating to him or her. The data subject shall also have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

5.3. Right to erasure ('right to be forgotten')

- (1) The data subject has the right that when he/she so requests, the Data Controller erase the personal data concerning him/her 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 by the Data Controller;
 - b) the data subject withdraws consent on which the processing is based, and no other legal ground subsists for the processing;
 - c) the data subject objects to the processing of his / her personal data 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 a legal obligation in Union or Member State law to which the Data Controller is subject;
 - f) the collection of the personal data occurred in connection with offering services regarding the information society.

- (2) In case the Data Controller has made the personal data public and then it becomes obliged to delete it as aforesaid, then it will, taking into account the available technology and the costs of implementation, take reasonable steps including technical steps in order to inform processors who carry out processing that the data subject has initiated that the links leading to the personal data concerned or the copies or reproductions of these be deleted.

- (3) Paragraphs (1) and (2) shall not apply to the extent that processing is necessary, among other things, for:
 - a) exercising the right of freedom of expression and information;
 - b) compliance with a legal obligation which requires processing by Union or Member State law to which the Data Controller is subject;
 - c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or



- d) the establishment, exercise or defence of legal claims.

5.4. Right to restriction of processing

- (1) The data subject has the right to obtain a restriction of processing from the Data Controller where one of the following applies:
 - a) the accuracy of the 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 the data subject requires them for the establishment, exercise or defence of legal claims;
 - d) the data subject has objected to processing based on the legitimate interest of the Data Controller pending the verification whether the legitimate interests of the Data Controller override those of the data subject.
- (2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with the consent of the data subject 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.
- (3) The Data Controller informs the data subject whose request has served as grounds for the restriction based on the above, before the restriction of processing is lifted.

5.5. Obligation to notify the rectification or erasure of personal data or restriction of processing

The Data Controller shall inform each recipient to whom or with which it has disclosed the personal data of any rectification, erasure, or restriction of processing, unless this proves impossible or involves a disproportionate effort. Upon request, the Data Controller shall inform the data subject of these recipients.

5.6. Right to data portability

- (1) 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, machine-readable format and the right to transmit such data to another controller without hindrance from the Data Controller, where:



- a) the processing is based on consent or on a contract; and
 - b) the processing is carried out by automated means.
- (2) In exercising the right to data portability under paragraph 1, the data subject shall have the right to request, where technically feasible, the direct transfer of personal data between controllers (such as the Data Controller and other controllers).
- (3) The exercise of the right described above must be without prejudice to the provisions on the right to erasure ("right to be forgotten") and must not adversely affect the rights and freedoms of others.

5.7. Right to objection

- (1) The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of legitimate interest. In such a case, the Data Controller shall no longer process the personal data, unless the Data Controller can demonstrate 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.
- (2) Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject shall have the right to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

5.8. Right to lodge a complaint with a supervisory authority

The data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the provisions of the GDPR. In Hungary, the competent supervisory authority is the National Data Protection and Freedom of Information Authority (website: <http://naih.hu/>; address: 1055 Budapest, Falk Miksa u. 9-11; mailing address: 1363 Budapest, Pf.: 9.; phone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu).

5.9. Right to an effective judicial remedy against a supervisory authority

- (1) The data subject has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him or her.



- (2) The data subject has the right to an effective judicial remedy if the supervisory authority does not handle a complaint or does not inform the data subject within three months of the procedural developments or the outcome of the complaint.
- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

5.10. Right to an effective judicial remedy against the Data Controller or the data processor

- (1) Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, the data subject has the right to an effective judicial remedy where he/she considers that his/her rights under the GDPR have been infringed as a result of the processing of his/her personal data in non-compliance with the GDPR.
- (2) Proceedings against the Data Controller or a processor shall be brought before the courts of the Member State where the Data Controller or processor is established. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has habitual residence. In Hungary, such proceedings fall within the jurisdiction of the General Court (in Hungarian: Törvényszék). The data subject may initiate proceedings - at his/her choice - before the competent General Court according to his/her place of residence or place of habitual residence. You can find more information about the availabilities of the courts here: www.birosag.hu

Budapest, 29 April 2026.