1. **Who are Link Asset Services and Link Hungary?**

Link Asset Services ("Link") is a trading name of companies which offer a range of services, principally shareholder, treasury management, banking, debt, fund and corporate administration services. Please refer to the “Legal and Regulatory Status” page on the Link Asset Services website (https://www.linkassetservices.com/) for more details on the trading companies in the Link Asset Services division. All of the companies are wholly owned subsidiaries of Link Administration Holdings Limited ("Link Group"). For more information on Link Group, please visit www.linkgroup.com.

Link Hungary LLC ("Link Hungary") is a Hungarian company with a registered address at Dohány u 12, 1074 Budapest, Hungary and registered by the Hungarian Company Court under the registration number 01 09 685579 which provides mainly corporate administration services and operates under the trading name of Link Asset Services.

2. **What is this Privacy Policy?**

At Link Hungary we collect personal information about you and are committed to protecting this information and your privacy. Set out below is an explanation of how we use, collect and safeguard your personal information. This Privacy Policy applies where any company within Link (including Link Hungary) receives personal data through its website, or in connection with any services that we are engaged to provide to you ("Services").

3. **What personal information do we collect?**

You may provide us with your personal information where you enter your personal information via our website, engage with us in respect of our Services, or correspond with us by phone, email or otherwise. It is provided entirely voluntarily.

Depending on the Services or information you request from us, we may ask you to provide the following personal information:

- Name, birth name, citizenship, address, mother’s maiden name, date and place of birth, ID and address card copy (or passport copy), email address, telephone number and other contact details.

We may keep a record of any correspondence you have with us, including certain telephone calls which we may be legally required to record (but we will inform you at the beginning of the telephone conversation if recording will be necessary).

With regard to each of your visits to our website we may automatically collect technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

We may, from time to time, receive information about you from other companies in the Link Group or our network, or from publically available sources. We may use this information in connection with our marketing activities (subject to section 11 below).

4. **Why do we collect your information?**

We collect this information in order for you to use our website, to provide any Services to you, and to carry out our marketing activities (subject to section 11 below). Our use of your information is based on a legitimate business interest we have in being able to provide the services.

In addition, we are required by law to obtain “know your client” information as detailed in our standard identification document (KYC form) and this includes certain personal information.

5. **How we use your personal information?**

We will use the information we hold about you for the following purposes:
In connection with a CONTRACT for Services with you

We will use and process your personal information where we have supplied you (or continue to supply you) with Services, where we have arranged for the supply of another company’s Services to you, or where you are in discussions with us about any new service. We will use this information in connection with our contract with you for the supply of those Services, (or when it is needed to enter into the contract); and so that we can communicate with you in relation to those Services (including notifying you of any changes to our Services).

Where you have provided CONSENT

We may use and process your personal information where you have consented for us to do so in connection with our marketing activities (see section 11 below).

You may withdraw your consent for us to use your information in this way at any time. Please see Withdrawing your consent in section 9 for further details.

Where it is necessary to comply with a LEGAL OBLIGATION

We may use, store and share your information where we are under a legal obligation to do so. This may include use of your information:

- to verify your identity;
- in connection with any legal obligation on us to report any fraud or other criminal activity (including money laundering or tax avoidance schemes).

Where we have a LEGITIMATE INTEREST

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business, provided that your interests or fundamental rights and freedoms are not overriding in light of reasonable expectations based on your relationship with us, for the following purposes:

- analysis to inform our marketing strategy, and to enhance and personalise your client experience;
- for the detection and prevention of fraud and other criminal activities;
- marketing activities (other than where we rely on your consent to contact you by email or text with information about our products and services or share your details with third parties to do the same);
- to verify the accuracy of data that we hold about you and create a better understanding of you as a client;
- network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- assess and improve our service to clients through recordings of any calls; and
- management of queries, complaints, or claims.

6. Who we share personal information with?

We will only disclose your personal information in accordance with applicable laws and regulations. We will disclose your information to the following third parties:

- Any person with legal or regulatory power over us (such as the Hungarian Data Protection Authority, Hungarian Tax Authority, Police) that may require disclosure on legal grounds;
- Service providers engaged by us to help us run our business and perform the Services or our contract with you. Such service providers may include, for example, cloud or archive storage providers (engaged by us to provide electronic or physical storage facilities for our business data and your information), or providers of software or other IT resources;
- Any member of the Link Group which means our subsidiaries, our ultimate holding company and its subsidiaries (from time to time) as necessary to perform the Services or our contract with you.

Some of these third parties (including Link Group subsidiaries and service providers) may be outside of the European Economic Area (EEA). If we transfer your information outside of the EEA in this way, we will take steps to ensure that any such subsidiary or service provider has put in place appropriate security measures to ensure that your information is held securely and your privacy rights continue to be protected as outlined in this policy. By submitting your personal data, you agree to the transfer, storing and/or processing of your information by these subsidiaries or service providers.

7. How do we keep your information secure?
We store the information you provide about yourself in a secure database and take appropriate security measures to protect such information from unauthorised access. For example, we have adopted internal data protection procedures and trained our staff on them with a view to preventing breaches of security. All exchanges of information between you and our website go through encrypted channels in order to prevent interception of your information.

You recognise that your use of our website is entirely at your own risk. As Link websites are grouped to the internet, which is inherently insecure, Link cannot guarantee the information you supply will not be intercepted while being transmitted over the internet. Accordingly, Link has no responsibility or liability for the security of personal information transmitted via our website.

8. How long will we store your information for?

We generally hold your personal data on our systems for as long as is necessary to provide Services or perform our contract. This is ordinarily 8 years from the date you cease to use the Services or the termination of our Agreement in order to allow us to refer to your information in correspondence with you, or in connection with legal or regulatory proceedings.

At your request for the removal or deletion of your personal data from our systems, we will erase your personal data without undue delay. Please see Your rights in section 9 for further details.

9. Your rights

You have the following rights in relation to how we use your information. If you’d like to exercise these rights please contact us using the contact details listed at section “Who can you speak to at Link about this Privacy Policy?”

- Right of access – you have the right to know if we are using your information and, if so, the right to access it and information about how we are using it.
- Right of rectification – you have the right to require us to rectify any errors in the information we hold about you.
- Right to erasure – you have the right to require us to delete your information if our continued use is not justified.
- Right to restrict processing - in some circumstances, although you may not be entitled to require us to erase your information, but may be entitled to limit the purposes for which we can use your information.
- Right of data portability – you have the right to require us to provide you with a copy of your information in a commonly used machine-readable format or to transfer your information directly to another controller (e.g. a third party offering services competing with ours).

Where we rely on your consent as the legal basis for processing your personal information, as set out under section 5, you may withdraw your consent at any time. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our Unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

10. How do Link websites use my Internet Protocol (IP) address and collect cookies?

Each time you use our websites, we will automatically collect certain technical information, including the type of browser you use, the Internet Protocol (IP) address used to connect your computer to the internet, and information about your visit, including the full Uniform Resource Locations (URL), clickstream to, through and from our sites, traffic data and other communication data, the resources that you access, and the information derived from the cookies we place on your mobile device and/or computer. In order to improve the quality of our website and services, we may from time to time send your computer a “cookie”. Cookies are text files that identify your computer to our server and are stored on your device. Cookies in themselves do not identify the individual user, just the computer used. Cookies enable us to improve your user experience by avoiding the need for you to enter the same information more than once. They also allow us to analyse user behaviour to improve the functionality and performance of our website.

We comply with the EU cookie regulations as introduced in the UK on 25 May 2011 through the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011. There are two types of cookies that can be stored on your device:

- "session cookies", which only last for the duration of your visit to our website and are automatically deleted from your device when you close your browser; and
- "persistent cookies", which remain on your device after you have visited our website and are not deleted when you close your browser. Persistent cookies are sent back to our server every time you visit our website.

We make use of session cookies, which are essential to maintain security throughout the site, and are not used for tracking purposes. Session cookies are used to help us remember your movements from page to page, avoiding the need for you to re-enter the same information. Session cookies are held in memory and expire when you leave our website.
In addition, in order to develop our site in line with customers’ needs, Link use an analytics and optimization service provided by WT EMEA Acquisitions Ltd (WebTrends) to track and analyse how parts of the site are used. We use this information to help improve the site. The data collected by WebTrends will be stored exclusively for analytical purposes and does not result in any personally identifiable data being collected or stored. WebTrends will send your computer a persistent cookie in order to evaluate your use of this site. WebTrends store the information collected by the persistent cookie on servers in the United States, European Union Member States and other countries. WebTrends may also transfer this information to third parties where required to do so by law, or where such third parties process the information on WebTrends’ behalf. WebTrends will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. WebTrends will not associate your IP address with any other data held by WebTrends. Link uses WebTrends to optimise this site and improve the service we provide to our visitors. This ensures that the website is fully functional and optimised to create the best possible user experience.

We never gather other information from your disk or computer. We will collect a copy of the data held by the cookie from inclusion in any analysis. We use full SSL protocols when collecting visitor information on secure pages; this ensures that the site’s security is not compromised. We encrypt all transmitted visitor information (even from non-secure pages), so no-one else can read the information we gather. None of the cookies used on our websites collect, record or store personally identifiable information about you.

By continuing to use this website, you are consenting to us placing session cookies on your device for the purposes detailed above. Most users will be able to adjust their internet settings to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these, of course, means that certain personalised services cannot then be provided to that user. Please note that the websites to which this site may be linked may also make use of their own cookies. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

11. Marketing

We respect your privacy and ensure we carry out our direct marketing activities in accordance with applicable laws and guidance.

We may contact you with marketing information by post or by telephone or with targeted advertising delivered online through social media and platforms operated by other companies, unless and until you object.

If you are a corporate entity and have engaged us for Services, we may also contact you with marketing information by email or other electronic means unless and until you object. If you are an individual or a member of an unincorporated entity (and except where the following paragraph applies) we will only contact you by email or electronic means with marketing information where you have given us your consent.

Where we have obtained your email address in connection with our contract with you for any Services, or where you have made a positive enquiry about any of our services, we may also contact you with marketing information about similar services by email or other electronic means unless and until you object.

We will only share your data with our recommended third party partners for them to contact you with marketing information about their products and services where you have indicated that you would like us to do so. Please use the link on the page requesting your consent to find out more about these third parties. Once shared, the relevant third party’s privacy policy will apply to their processing of your personal information, not ours. If you’d like to opt-out of receiving marketing from a third party after providing your consent, you can do so at any time by contacting the relevant third party directly.

From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you consent to continue receiving marketing information from us.

You have the right to opt-out of our use of your personal information to provide marketing to you by informing us (if we call you by telephone), or by clicking the “unsubscribe link” on any marketing email that we send to you, or by contacting us as set out in section 14 below.

12. Following links from our websites

Our website may contain links to other sites. Such other sites may also make use of their own cookies and will have their own privacy policies. You should carefully review the privacy policies and practices of other sites, as we cannot control or be responsible for their privacy practices. We do not accept any liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

13. Changes to this Privacy Policy

Please note that this policy will be reviewed and may be changed from time to time so please check the page on our website at www.linkgroup.com occasionally to ensure that you are happy with any changes. This policy was last updated on 16 May 2018.
14. **Who can you speak to at Link about this Privacy Policy?**

Questions, comments and the exercise of your rights regarding this Privacy Policy and your information are welcomed and should be addressed to the Data Privacy Manager by email at Operations@linkgrouphungary.eu or by post at Dohany utca 12, 1074 Budapest, Hungary.

If you wish to make a complaint on how we have handled your personal information, you can contact our Data Privacy Manager. If you are not satisfied with our response or believe we are processing your personal information not in accordance with the law you can complain to the supervisory authority in Hungary responsible for the implementation and enforcement data protection law: Hungarian National Authority for Data Protection and Freedom of Information ("NAIH"). You have the right to complain to NAIH about our collection and use of your information. You can contact NAIH via their website – http://www.naih.hu - or by calling their phone at +36-1-391-1400