PRIVACY NOTICE

Public Information Notice on the Data Processing Practices of 3D MAP Ltd.



Prepared by: 3D MAP Ltd.

Document Version: 1.0

Document Identifier: 3D-SZAB-03/extract

Date: 1 September 2026

Classification: Public

Content

1. Purpose and Scope of this Notice....3
2. Data Controller Information....3
3. Our Data Processing Principles....3
4. Contact Requests and Requests for Quotations....4
5. Business Partner and Contractual Communications....5
6. Financial and Accounting Data Processing....6
7. Compliance and Reporting Data....6
8. Website, Technical, and Statistical Data....6
9. Data Processors and Recipients....7
10. International Data Transfers....7
11. Data Security....7
12. Rights of Data Subjects....8
13. Remedies and Contact Information....8
14. Effectiveness and Amendments....9

Important Notice

This English-language version is provided solely for information purposes.

In the event of any discrepancy, inconsistency, omission, or difference in interpretation between this English-language version and the original Hungarian document, the Hungarian-language version shall prevail.

The governing and binding version of this Privacy Notice is the original Hungarian-language document maintained by 3D MAP Ltd.

1. Purpose and Scope of this Notice

The purpose of this Notice is to present, in a clear and understandable manner, how 3D MAP Ltd. processes personal data that comes to its attention in the course of its operations.

This Notice is a publicly disclosable extract of the Company's internal Data Processing and Data Protection Policy.

This Notice applies in particular to individuals initiating contact through the website, e-mail, telephone, or other communication channels; contact persons of clients and business partners; natural persons identified in contracts and project-related communications; and individuals submitting compliance-related or other reports

Our Approach to Data Processing

3D MAP Ltd. does not maintain marketing databases, does not engage in commercial or large-scale collection of personal data, and does not use personal data for profiling purposes.

Personal data is processed solely for specific business, contractual, legal, financial and accounting, compliance-related, or communication purposes

2. Data Controller Information

DESCRIPTION	DETAILS
Data Controller	3D MAP Ltd.
Registered Office	1102 Budapest, Állomás utca 13.
Website	https://www.3dmap.hu
E-mail	adatkezeles@3dmap.hu
Privacy Contact	The Managing Director of the Company or a person designated by the Managing Director

3. Our Data Processing Principles

Lawfulness and Transparency

Personal data is processed on an appropriate legal basis and in a manner understandable to data subjects.

Purpose Limitation

Data is used exclusively for specified and lawful purposes.

Data Minimisation

We process only those categories of data that are necessary and proportionate for achieving the intended purpose.

Accuracy

We take into account material changes that come to our attention and initiate the correction of inaccurate data where necessary.

Storage Limitation

Data is retained only for as long as justified by the relevant purpose, contract, legal obligation, accounting requirement, warranty obligation, guarantee period, or legal claim.

Confidentiality

Access is restricted to those individuals who require it for the performance of their duties, projects, or system-related responsibilities, and appropriate technical and organisational measures are applied in proportion to the risks involved.

Where processing is necessary for the preparation or performance of a contract, separate consent is generally not required. In other cases, the legal basis for processing may be a legal obligation, legitimate interest, or the consent of the data subject.

4.Contact Requests and Requests for Quotations

A contact request includes, in particular, enquiries, questions, requests for quotations, or contact initiatives submitted through the website contact form, quotation request form, e-mail, telephone, or any other electronic communication channel.

PROCESSED DATA	INFORMATION
Contact and related data	Name, e-mail address, telephone number, organisation, area of interest, message content, and any additional information voluntarily provided by the individual.
Purpose	Establishing contact, responding to enquiries, understanding the request, preparing a quotation, and preparing a potential contractual relationship.
Legal Basis	Steps taken prior to entering into a contract and the Company's legitimate interest in responding and maintaining business communications.

PROCESSED DATA	INFORMATION
Access and Recipients	Employees involved in responding or preparing quotations and, where necessary, professionally engaged contributors bound by appropriate confidentiality obligations.
Retention Period	Until the purpose ceases to exist and for any justified follow-up, evidentiary, or legal enforcement period. If a contract is concluded, the data may continue to be processed as part of the contractual documentation.
Marketing Use	Enquiries are not used to create marketing lists, and the data is not used for advertising or profiling purposes.

5. Business Partner and Contractual Communications

The Company processes the personal data of contact persons, representatives, and project participants of clients and business partners for the purposes of contract preparation and performance, project-related communication, and supporting ongoing business cooperation.

DATA CATEGORY	PURPOSE AND PROCESSING
Contact and related data	Name, position, business e-mail address, telephone number, organisation, project role, and related communications.
Contractual documents	Personal data appearing in contracts, quotations, certificates of performance, meeting records, or other business documents may be processed as an integral part of such documentation.
Internal access	Access is limited to individuals who perform actual duties in relation to the relevant partner, contract, or project.
Retention period	Based on the duration justified by the business relationship, contractual documentation, warranty and guarantee periods, and legal enforcement requirements.

DATA CATEGORY	PURPOSE AND PROCESSING
Changes in contact persons	If a former contact person is no longer authorised to act, no further information is provided to that individual and the designation of a new contact person is initiated.

Personal data contained in project documentation is not automatically removed where such data is necessary for understanding the documentation, maintaining continuity of project history, or lawful retention purposes.

6. Financial and Accounting Data Processing

Invoices, supporting documents, payment information, and related records are processed for the purposes of contract performance, invoicing, accounting, financial reporting, and compliance with legal obligations.

Only data necessary for financial and accounting tasks is provided to the accounting function. Accountants normally have access only to invoices and required supporting documents. Where audit or verification needs arise, controlled access to the relevant contract or the necessary portion thereof may be provided.

The Company may use cloud-based invoicing, storage, and collaboration services in connection with financial data processing. Such service providers may process data only to the extent necessary for delivering their services.

7. Compliance and Reporting Data

The Company may process personal data in relation to compliance matters, conflicts of interest, third-party due diligence procedures, and whistleblowing reports. Depending on the nature of the case, the processed data may include information relating to reporters, affected persons, witnesses, contact persons, or business partners.

The purpose of such processing is to receive, assess, investigate, document, and resolve the matter, implement necessary measures, and fulfil applicable legal or contractual obligations.

Access to such data is restricted to the Managing Director, the designated Compliance Officer, and those contributors whose involvement is necessary for handling the case. The identity and data of reporters and affected individuals are treated confidentially.

8. Website, Technical, and Statistical Data

The Company's website does not provide newsletter subscriptions, marketing profiling, or commercial-scale collection of personal data. Processing of information voluntarily submitted through contact or quotation request functions is governed by the relevant sections of this Notice.

The operation of the website and information technology services may generate technical log data, including IP addresses, device or browser information, access timestamps, and security or error events. Such data is processed for operating, troubleshooting, protecting, and securing the services and preventing

misuse. Retention periods are determined by technical settings, security requirements, and any incident investigations that may arise.

The Company may use aggregated or partially anonymised visitor statistics to analyse and improve website performance. Where analytical or marketing technologies requiring consent are used, separate cookie information is provided to enable users to assess and provide any required consent.

9. Data Processors and Recipients

Depending on the nature of the activity, the Company may engage accounting, payroll, invoicing, e-mail, web hosting, cloud, storage, and information technology service providers. In certain projects, external experts, developers, or subcontractors may also participate where justified by the contract and project requirements.

Such service providers and contributors may access personal data only to the extent necessary for performing their duties and in accordance with applicable contractual, confidentiality, and data protection obligations.

Personal data is disclosed to public authorities or courts only where required by law or pursuant to a lawful request.

Up-to-Date Service Provider Information

The range of service providers used by the Company may change over time. Upon request, data subjects may obtain information regarding the specific recipients or processors involved in a particular processing activity.

10. International Data Transfers

In connection with international projects or the use of cloud services, personal data may become accessible to recipients or service environments located outside the European Economic Area (EEA).

Such transfers take place only on an appropriate legal basis and under conditions permitted by the GDPR. The Company takes into account the information security environment of the receiving country and partner, the communication channels used, and the sensitivity of the data.

Risk mitigation measures may include limiting the scope of transferred data, access controls, document protection measures, and enhanced project management oversight.

11. Data Security

The Company protects personal data, customer information, and confidential business information through technical and organisational measures proportionate to the scale of operations, project characteristics, and system environment.

Access rights are granted primarily on the basis of project involvement, system role, and job responsibility. Internal systems and those belonging to clients and partners are used in accordance with their applicable security and operational requirements. Passwords are handled confidentially, and multi-factor

authentication is used wherever available. When sharing documents, consideration is given to their sensitivity, the recipient's authorisation level, and the technical capabilities of the relevant partner.

If an employee gains access to information that is likely outside their authorised area of responsibility, such information must not be used and the responsible organisation or project representative must be notified.

In the event of a data protection or information security incident, immediate steps are taken to reduce risk and provide any necessary notifications.

12. Rights of Data Subjects

Subject to applicable legal requirements, data subjects may:

1. request information concerning the processing of their personal data;
2. request access to and copies of their personal data;
3. request the rectification of inaccurate personal data;
4. request the erasure of personal data concerning them or restriction of processing;
5. object to processing based on legitimate interests;
6. exercise their right to data portability where legal conditions are met;
7. withdraw consent at any time where processing is based on consent; and
8. lodge a complaint with the supervisory authority or seek judicial remedy.

The exercise of data subject rights does not automatically result in the deletion or modification of data. The Company assesses whether retention continues to be justified by legal requirements, contractual obligations, accounting requirements, warranty obligations, compliance matters, or legal claims.

Requests are generally answered within one month of receipt. Where the identity of the requester or the relevant data cannot be established with sufficient certainty, the Company may request additional information necessary for secure processing of the request.

13. Remedies and Contact Information

Questions, requests, or complaints relating to data processing may be submitted to: compliance@3dmap.hu.

The Company seeks to resolve issues directly, substantively, and proportionately whenever possible.

Data subjects may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

CONTACT INFORMATION	**DETAIL**
Authority	National Authority for Data Protection and Freedom of Information *Nemzeti Adatvédelmi és Információszabadság Hatóság*
Address	1055 Budapest, Falk Miksa utca 9-11.

CONTACT INFORMATION	DETAIL
Postal Address	1363 Budapest, Pf. 9.
Telephone	+36 (1) 391-1400
E-mail	ugyfelszolgalat@naih.hu
Website	https://www.naih.hu

Data subjects are also entitled to seek judicial remedy if they believe that their rights have been infringed in connection with the processing of their personal data.

14. Effectiveness and Amendments

This Privacy Notice is effective as of 1 September 2026. The Company reviews the Notice in the event of legislative changes, new processing activities or systems, significant changes in service providers, or material changes in data processing practices.

The current version is always available on the Company's website.

This Notice does not include detailed internal procedures, registers, incident management processes, or technical system configurations.