PRIVACY AND DATA PROCESSING NOTICE

W5 INFORMATIKAI KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG
(7678 Abaliget, Kossuth Lajos utca 12., Hungary)

Abaliget, 10 November 2026

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I.THE DATA CONTROLLER

W5 Informatikai Korlátolt Felelősségű Társaság (hereinafter: the Company, the Data Controller or "We") has adopted the following privacy notice in order to ensure the lawfulness of its internal data processing operations and the rights of data subjects.

Name of the Data Controller:**W5 Informatikai Korlátolt Felelősségű Társaság**
Brand name of the Data Controller:**W5labs**
Company registration number:**Cg. 02-09-072933**
Registered office:**7678 Abaliget, Kossuth Lajos utca 12., Hungary**
Office:**Batthyány u. 2–4., Pécs, Hungary**
Tax number:**14432945-2-02**
Electronic contact address:**privacy@w5labs.com**
Representative of the Data Controller:**Zoltán Csepregi, Managing Director**

The Data Controller is not obliged to designate a data protection officer and has therefore not designated one. For data protection matters, it can be reached at the electronic address above.

Our Company processes personal data in accordance with all applicable legislation, and primarily with the provisions of the following laws:

- Act CXII of 2011 on the Right to Informational Self-Determination and on Freedom of Information (hereinafter: Info Act),
- 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 (General Data Protection Regulation) (hereinafter: the Regulation or GDPR),
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (hereinafter: Grt.).

Our Company treats personal data confidentially and takes all IT, technical and organisational measures related to data storage and processing that support secure data processing in order to safeguard the data.

Our Company has drawn up this notice in order to present the purposes and characteristics of the processing of personal data in connection with visits to the https://w5labs.com website, the use of the services provided on the site, events organised by the Company or held with its participation, and client relationships, and to inform data subjects accordingly.

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II.DEFINITIONS

Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data (unless otherwise indicated, in this Privacy Notice the controller means W5 Informatikai Kft.);

Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Recipient: a natural or legal person, public authority, agency or other body to which the controller discloses the personal data it processes;

Data subject: the natural person whose personal data the controller uses (i.e. carries out processing activities on; including, among others, prospective clients, clients and participants of our events);

Consent of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

Supervisory authority or NAIH: the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság);

Third party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

Third country: a state outside the European Economic Area;

Profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

Personal data: any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, e-mail address, telephone number, postal address, billing address or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Special categories of personal data: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health and data concerning a natural person's sex life or sexual orientation;

Client: any person who expresses interest in the controller's products and services in person, on the website, by telephone, at an event or in any other way, as well as any person who enters into a contract or legal relationship with the controller.

III.CHARACTERISTICS OF THE INDIVIDUAL PROCESSING PURPOSES

1. Use of cookies on the website

We use cookies in order to maintain and develop the services of the https://w5labs.com website and to enhance the user experience.

What is a cookie?

Cookies are small text files placed on the user's device by the browser that serve identification and information-gathering purposes. A cookie consists of a unique string of numbers and is primarily used to distinguish between the computers and other devices that download the website. Cookies

have several functions: among other things, they collect information, remember user settings and enable the website owner to learn about user habits in order to improve the user experience. We use cookies on our website for the following purposes:

- providing the basic functions necessary for the operation of the website (session, remembering cookie settings),
- spam protection,
- visitor measurement and web analytics on how visitors use the website,
- developing our pages and improving the user experience.

What cookies does the website use?

We provide the following information about the cookies used by the website:

Cookie name	**Data processed by the cookie**	**Cookie lifetime**	**Function of the cookie, purpose of processing**
Strictly necessary cookies (session, cookie consent)	Technical identifier, cookie settings	session – 1 year	Providing the basic functions of the website and remembering the visitor's cookie settings.
Google Analytics _ga	Random identifier used to distinguish users	2 years	Distinguishing visitors for traffic statistics.
Google Analytics _ga_[identifier]	Data relating to the session state	2 years	Preserving the session state for visitor measurement.

Further information on third-party cookies is available at the following link:

Google Analytics: https://support.google.com/analytics/answer/11397207?hl=en

The website does not sell, rent or otherwise disclose the information collected by cookies to third parties in any way other than as described in the cookie manager, except to the extent necessary to provide services to which the data subject has given prior and voluntary consent.

What is the legal basis for processing by cookies?

We use cookies that are essential for the operation and use of the site on the basis of our legitimate interest under Article 6(1)(f) GDPR; the legal basis for the use of other cookies is the consent of the data subject [Article 6(1)(a) GDPR], which can be given via the cookie manager.

How can you check and disable cookies?

Consent previously given can be withdrawn at any time via the consent manager.

In addition, all modern browsers allow cookie settings to be changed. Most browsers accept cookies automatically by default, but this can usually be changed to prevent automatic acceptance and to offer you the choice each time whether or not to allow cookies.

Since the purpose of cookies is to facilitate or enable the usability and processes of the website, preventing or deleting cookies may mean that users are unable to use all functions of the website or that the website will work differently than intended in their browser.

Information on the cookie settings of the most popular browsers is available at the following links:

Google Chrome
https://support.google.com/chrome/answer/95647?hl=en

Firefox
https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences

Microsoft Edge
https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09

Opera
https://help.opera.com/en/latest/web-preferences/#cookies

Safari
https://support.apple.com/en-us/guide/safari/sfri11471/mac

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2. Sending a LinkedIn profile

Through our Careers subpage, we give our visitors the opportunity to send us their LinkedIn profile. In the course of electronic communication with the data subject, we process their personal data as set out in this notice.

Purpose of processing

The purpose of processing is to learn about the professional background of the interested person on the basis of the LinkedIn profile they have sent. The Data Controller does not store the data provided on LinkedIn; such data are subject to LinkedIn's privacy rules (for more information: https://www.linkedin.com/legal/privacy-policy).

Personal data processed

Name, e-mail address and any other information that the data subject considers relevant in the course of the contact initiated by them. The data subject may voluntarily provide their telephone number if they wish us to contact them directly by telephone.

Legal basis for processing

The legal basis for processing personal data is Article 6(1)(b) of the Regulation, i.e. processing is necessary in order to take steps at the request of the data subject prior to entering into a contract. The Data Controller considers communication with the data subject to be preliminary processing related to an employment contract (agreement) that may be concluded at a later date.

In addition, Article 6(1)(f) of the Regulation (legitimate interest) also provides a legal basis for the Data Controller's processing. The Data Controller has a legitimate interest in processing the personal data necessary to respond when it is contacted on any matter.

Source of personal data

The personal data are provided to the Data Controller directly by the data subject.

Recipients of the personal data provided

Only those employees of the Data Controller are entitled to process the personal data who have the authority to make proposals or decisions in relation to the message sent by the data subject or the handling of matters arising from it.

Transfer of personal data to a third country or an international organisation

We do not transfer personal data to any third country or international organisation.

Duration of processing

The Data Controller deletes the data subject's message after the communication has been closed, but no later than after 1 year, or at the data subject's request.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Processing the personal data is a condition for replying to the message and thus for communication between the data subject and the Data Controller.

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3. Data processing related to electronic communication

We communicate with our users, partners and clients primarily by electronic means. Anyone can contact our Company via the form on the website, by e-mail or by telephone, whether to request a quote, request information, ask technical questions or on any other topic.

Purpose of processing

Electronic communication and replying to enquiries. We process the data provided by the data subject solely for the purpose of communicating with them and handling the matters contained in their message.

Personal data processed

Name, e-mail address, company name and any other information that the data subject considers relevant to the matter they have initiated. When making contact or requesting a quote, the data subject may voluntarily provide their telephone number if they wish us to reply to them directly by telephone.

Legal basis for processing

The legal basis for processing personal data is Article 6(1)(b) of the Regulation, i.e. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

In addition, Article 6(1)(f) of the Regulation (legitimate interest) also provides a legal basis for the Data Controller's processing. The Data Controller has a legitimate interest in processing the personal data necessary to respond when it is contacted on any matter.

Source of personal data

The personal data are provided to the Data Controller directly by the data subject.

Recipients of the personal data provided

Only those employees of the Data Controller are entitled to access the personal data who have the authority to make proposals or decisions in relation to the message sent by the data subject or the handling of matters arising from it. The data processor named in Chapter IV (Google Ireland Limited) is involved in storing e-mail correspondence.

Transfer of personal data to a third country or an international organisation

Due to the use of Google Ireland Limited as a data processor, the data may be transferred to the United States of America. The transfer is based on the Commission's adequacy decision on the EU–US Data Privacy Framework and on the standard contractual clauses adopted by the European Commission.

Duration of processing

If a contract of any kind is concluded between the Data Controller and the data subject, we process the personal data obtained during the communication in connection with that contract, until the end of the limitation period (5 years) at the latest.

If no contract or agreement is concluded between the Data Controller and the data subject following pre-contractual processing, the Data Controller deletes the message(s) 1 year after the communication has been closed.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Processing the personal data is a condition for replying to the message and thus for communication between the data subject and the Data Controller.

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4. Requesting a free AI visibility snapshot

At our presentations and events, a free AI visibility snapshot can be requested via a form accessible by QR code. The snapshot shows how the requester's company appears in AI-based search engines and what improvement opportunities we see on its website.

Purpose of processing

The purpose of processing is to prepare and send the snapshot requested by the data subject, to send the related confirmation e-mail, and to send one follow-up e-mail asking questions about the snapshot.

To prepare the snapshot, we analyse the publicly available content of the website provided. We provide the AI-based tools used for the analysis only with the company name and website address, not with the requester's name or e-mail address.

Personal data processed

Name, e-mail address, company name, the company's website address, the time and source of submission (the event at which the form was completed), as well as data on the opening of the e-mails sent and on clicks on the links they contain.

Legal basis for processing

The legal basis for processing personal data is Article 6(1)(b) of the Regulation, i.e. processing is necessary for the performance of the service requested by the data subject (preparing and sending the snapshot).

Consent to marketing communications is independent of this and is not a condition for requesting the snapshot (see point 5).

Source of personal data

The personal data are provided to the Data Controller directly by the data subject.

Recipients of the personal data provided

Only those employees of the Data Controller are entitled to access the personal data who are involved in preparing and sending the snapshot and in the related communication. The Data Controller stores the data in its in-house developed customer relationship management system; the data processor Klaviyo, Inc. named in Chapter IV is involved in sending the e-mails.

Data provided when purchasing tickets for the event are processed by the event venue as an independent data controller, in accordance with its own privacy notice. The Data Controller only receives the data of those who complete the snapshot form themselves.

Transfer of personal data to a third country or an international organisation

Due to the use of Klaviyo, Inc. (USA) as a data processor, the personal data may be transferred to the United States of America. The transfer is based on the European Commission's adequacy decision of 10 July 2023 on the EU–US Data Privacy Framework, to which the provider has signed up, and on the standard contractual clauses adopted by the European Commission.

Duration of processing

We process the personal data for 1 year from sending the snapshot. If a contract is concluded during this period between the Data Controller and the data subject or their company, we continue to process the data as set out in point 3.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Providing the personal data is a condition for preparing and sending the snapshot. The snapshot cannot be prepared without the website address.

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5. Newsletter and marketing communications

In our newsletter and marketing communications, we inform those who have expressly consented to this about professional content, our events, and our services and offers.

Purpose of processing

The purpose of processing is to send newsletters, professional content, event invitations and offers relating to the Data Controller's services by e-mail, and to make related contact.

Personal data processed

Name, e-mail address, company name, the time and source of subscription (consent), as well as data on the opening of the e-mails sent and on clicks on the links they contain.

Legal basis for processing

The legal basis for processing personal data is the consent of the data subject under Article 6(1)(a) of the Regulation and Section 6(1) of the Grt.

Consent is voluntary. The consent checkbox is not pre-ticked, and giving consent is not a condition for using any other service (such as the snapshot). Consent may be withdrawn at any time without giving reasons via the unsubscribe link at the bottom of the e-mails or by e-mail to privacy@w5labs.com. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal.

Source of personal data

The personal data are provided to the Data Controller directly by the data subject.

Recipients of the personal data provided

Only those employees of the Data Controller are entitled to access the personal data who are involved in compiling and sending newsletters and communications. The data processor Klaviyo, Inc. is involved in sending the e-mails.

Transfer of personal data to a third country or an international organisation

Due to the use of Klaviyo, Inc. (USA) as a data processor, the personal data may be transferred to the United States of America. The transfer is based on the European Commission's adequacy decision of 10 July 2023 on the EU–US Data Privacy Framework, to which the provider has signed up, and on the standard contractual clauses adopted by the European Commission.

Duration of processing

We process the personal data until consent is withdrawn (unsubscription). We retain the fact and time of giving consent for 5 years from withdrawal in order to demonstrate the lawfulness of the consent.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Providing the personal data is voluntary. Without consent, we do not send newsletters or marketing communications.

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6. Records of client and partner relationships

Purpose of processing

The purpose of processing is to keep records of the contact persons of our clients, partners and prospective clients in a customer relationship management (CRM) system, to maintain business relationships, and to prepare and perform contracts.

Personal data processed

The contact person's name, position, business e-mail address and telephone number, and the history of contact (enquiries, quotes, discussions).

Legal basis for processing

The legal basis for processing personal data is legitimate interest under Article 6(1)(f) of the Regulation. The Data Controller has a legitimate interest in recording and maintaining its business relationships. In the case of a contractual relationship, the legal basis is Article 6(1)(b) of the Regulation.

Source of personal data

The personal data are provided to the Data Controller by the data subject or by the client or partner designating the data subject as a contact person, or they originate from publicly available company sources (e.g. the company's website).

Recipients of the personal data provided

Those employees of the Data Controller are entitled to access the personal data who perform tasks in the given client or partner relationship. The customer relationship management system has been developed and is operated by the Data Controller itself; no external provider has access to the data.

Transfer of personal data to a third country or an international organisation

We do not transfer personal data to any third country or international organisation.

Duration of processing

We process the personal data for 5 years from the termination of the business relationship.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Processing the personal data is a condition for maintaining the business relationship and performing the contract.

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7. Photographs taken at events

Photographs are taken at our presentations and events, which we publish on our website, our blog and our social media pages (e.g. LinkedIn). Participants are informed about photography at the event venue.

Purpose of processing

The purpose of processing is to present the event and the Company's professional activities.

Personal data processed

The image of the participants.

Legal basis for processing

For group photos and general atmosphere photos taken at the event, the legal basis is legitimate interest under Article 6(1)(f) of the Regulation. The Data Controller has a legitimate interest in presenting its events.

The legal basis for publishing portrait-style photographs featuring a single person is the consent of the data subject under Article 6(1)(a) of the Regulation.

Anyone who does not wish to appear in the photographs may inform the organisers at the event. Removal of a photograph that has already been published can be requested at privacy@w5labs.com.

Source of personal data

The photographs are taken by the Data Controller or on its behalf.

Recipients of the personal data provided

Only those employees of the Data Controller are entitled to access the personal data who need it to perform their duties.

Transfer of personal data to a third country or an international organisation

We do not transfer personal data to any third country or international organisation.

Duration of processing

We process the photographs until the purpose of publication ceases, or until the data subject objects or withdraws their consent.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Being photographed is not a condition for participating in the event.

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8. AI Advisor chatbot on the website

On our website, an AI-based chatbot (AI Advisor) helps visitors learn about our services. Please do not provide any personal data during the conversation that is not necessary to answer your question.

Purpose of processing

The purpose of processing is to answer the visitor's questions and, if the visitor so requests, to prepare for making contact.

Personal data processed

The text of the conversation and, if provided by the data subject: name, e-mail address, company name.

Legal basis for processing

The legal basis for processing personal data is Article 6(1)(b) of the Regulation (taking steps at the request of the data subject) and Article 6(1)(f) (the Data Controller's legitimate interest in responding to enquiries and developing the service).

Source of personal data

The personal data are provided to the Data Controller directly by the data subject.

Recipients of the personal data provided

The conversations may be accessed by those employees of the Data Controller who are involved in operating the chatbot and responding to enquiries. Soulances Kft., named in Chapter IV, and the sub-processors it engages are involved in operating the chatbot.

Transfer of personal data to a third country or an international organisation

The provider of the language model generating the answers (Anthropic PBC) and several of the sub-processors of Soulances Kft. operate in the United States of America, so the text of the conversations may be transferred there. The transfer is based on the standard contractual clauses adopted by the European Commission.

Duration of processing

Conversations are automatically deleted after 180 days.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Use of the chatbot is voluntary and is not a condition for using the website.

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9. Logging during the operation of the service

Purpose of processing

In operating IT systems, it is essential to ensure the security of the system and the smooth activity of users, and to this end we log events on the website and in the software. Further purposes are to ensure uninterrupted operation, to detect and prevent malicious attacks against the site and enable their subsequent investigation, and to help defend against further such incidents.

Personal data processed

The visitor's IP address, the time of the visit, the address of the page accessed, and technical data relating to the browser.

Legal basis for processing

The legal basis for processing personal data is legitimate interest under Article 6(1)(f) of the Regulation, as defined in the purpose of processing.

Source of personal data

The data subject.

Recipients of the personal data provided

Only those employees of the Data Controller are entitled to access the personal data who need it to perform their duties.

Transfer of personal data to a third country or an international organisation

We do not transfer personal data to any third country or international organisation.

Duration of processing

Log files are retained for 2 years.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Processing the personal data is a condition for visiting the website and using the service.

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10. Invoicing

Purpose of processing

The purpose of processing is to issue invoices for the consideration of services and to retain accounting documents as required by law.

Personal data processed

Data shown on the invoice: name, address, tax number, data relating to performance.

Legal basis for processing

The legal basis for processing personal data is compliance with a legal obligation under Article 6(1)(c) of the Regulation (Act CXXVII of 2007 on Value Added Tax and Act C of 2000 on Accounting).

Source of personal data

The personal data are provided to the Data Controller directly by the data subject.

Recipients of the personal data provided

The personal data may be accessed by the Data Controller's employees performing financial tasks and by the Company's accountant.

Transfer of personal data to a third country or an international organisation

We do not transfer personal data to any third country or international organisation.

Duration of processing

We retain accounting documents for 8 years pursuant to Section 169 of Act C of 2000 on Accounting.

Automated decision-making and profiling

Neither takes place during processing.

Provision of personal data

Processing the personal data is based on a legal obligation; providing them is a condition for issuing the invoice.

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IV.DATA PROCESSORS AND DATA SECURITY

The Data Controller operates the website, form submissions and the customer relationship management system on its own servers located in Hungary and does not use an external hosting provider for these. In addition, the Data Controller uses the following data processors for processing personal data. Data processors may process personal data solely in accordance with the Data Controller's instructions and to the extent necessary to perform their tasks. We do not sell personal data and do not disclose it to third parties for marketing purposes.

Data processor	Registered office	Task	Transfer to a third country
Klaviyo, Inc.	125 Summer Street, Boston, MA 02110, USA	Sending confirmation, follow-up and newsletter e-mails	EU–US Data Privacy Framework, standard contractual clauses
Google Ireland Limited	Gordon House, Barrow Street, Dublin 4, Ireland	E-mail and document management (Google Workspace), visitor measurement (Google Analytics)	EU–US Data Privacy Framework, standard contractual clauses
Soulances Kft. (AskBruxy)	2314 Halásztelek, Kisgyár u. 60., Hungary	Operation of the AI Advisor chatbot (with sub-processors, see below)	standard contractual clauses (for the sub-processors below)

Soulances Kft. engages the following sub-processors to operate the AI Advisor: Anthropic PBC (USA – generating answers with a language model), Voyage AI (USA – searching and ranking texts), Render Services, Inc. (USA, with servers in Frankfurt – hosting and runtime environment), Hetzner Online GmbH (Germany – file storage and backup), Functional Software, Inc. (Sentry, USA – error monitoring). Data transfers to the United States are based on the standard contractual clauses adopted by the European Commission.

The Data Controller discloses personal data at the request of authorities, courts and other entitled bodies only if required to do so by law.

The Data Controller stores personal data in password-protected systems with restricted access rights, the website operates over an encrypted (HTTPS) connection, and regular backups are made. Only those employees who need access to personal data to perform their duties have such access. In the event of a personal data breach, the Data Controller proceeds in accordance with Articles 33–34 of the Regulation.

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V.RIGHTS OF THE DATA SUBJECT IN RELATION TO DATA PROCESSING

Right to information

The data subject has the right to receive information about data processing, which the Data Controller fulfils by making this notice available.

Processing based on consent

Where the legal basis for any processing is the consent of the data subject, the data subject is entitled to withdraw their previously given consent at any time. However, please note that withdrawal of consent can only apply to data for which there is no other legal basis for processing. If there is no other legal basis for processing the personal data concerned, the personal data will be permanently and irretrievably deleted after the withdrawal of consent. Under the Regulation, withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right of access

At the data subject's request, the Data Controller will inform them at any time whether their personal data are being processed and, if so, will provide access to the personal data and the following information:

a) the purposes of the processing;
b) the categories of personal data concerned;
c) the recipients or categories of recipients to whom the Data Controller has disclosed or will disclose the personal data, including in particular recipients in third countries or international organisations;
d) the envisaged period for which the personal data will be stored or, if that is not possible, the criteria used to determine that period;
e) we also inform the data subject of their right to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning them, and to object to such processing;
f) the right to lodge a complaint with a supervisory authority and to initiate court proceedings;
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, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Right to rectification of personal data

The data subject has the right at any time to obtain from us without undue delay the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject also has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Please report any change in your personal data as soon as possible, thereby facilitating lawful processing and the exercise of your rights.

Right to erasure

The data subject has the right to obtain from the Data Controller the erasure of personal data concerning them 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;
b) in the case of processing based on consent, the data subject withdraws the consent on which the processing is based and 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, or the data subject objects to processing for direct marketing purposes;
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 personal data have been collected in relation to the offer of information society services.

Right to restriction of processing

The data subject has the right to obtain from the controller restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by the data subject, for a period enabling us 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 defence of legal claims; or
d) the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right to object

Where the legal basis for processing personal data is the legitimate interest of the Data Controller (Article 6(1)(f) of the Regulation), the data subject has the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data, including profiling based on those provisions.

Where the controller processes the data subject's personal data for direct marketing purposes (e.g. sending informational e-mails), the data subject has the right to object at any time to the processing of personal data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Legitimate interest assessment

Where the legal basis for processing personal data is the legitimate interest of the controller or a third party under Article 6(1)(f) of the Regulation, we prepare a written "legitimate interest assessment" pursuant to Recital (47) and Article 5(2), which the data subject may request by writing to privacy@w5labs.com.

Right to data portability

The data subject has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format, and has the right to have the Data Controller transmit those data to another controller, where:

a) the processing is based on the data subject's consent or on a contract pursuant to Article 6(1)(b) of the Regulation; and
b) the processing is carried out by automated means.

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VI.PROCEDURE FOR EXERCISING THE DATA SUBJECT'S RIGHTS

The data subject may exercise the above rights by e-mail sent to privacy@w5labs.com, by post sent to the Company's office (Batthyány u. 2–4., Pécs, Hungary) or registered office, or in person at the Company's office. Our Company begins examining and fulfilling the data subject's request without undue delay after its receipt. We inform the data subject of the measures taken on the basis of their request within one month of its receipt at the latest. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months, of which we will inform the data subject within one month, stating the reasons for the delay. If we are unable to fulfil the request, we will inform the data subject within one month of the reasons for refusal and of their rights to legal remedy. Before fulfilling the request, the Data Controller may verify the identity of the requester.

Within five years of the data subject's death, the rights to which the deceased was entitled during their lifetime as set out in this notice may be exercised by a person authorised by the data subject by means of an administrative instruction or by a declaration made to the Data Controller in a public deed or a private deed of full probative value (if the data subject made several declarations to one controller, the declaration made at the later date applies). If the data subject has not made such a declaration, their close relative under the Hungarian Civil Code is nevertheless entitled, within five years of the data subject's death, to exercise the rights to which the deceased was entitled during their lifetime under Articles 16 (right to rectification) and 21 (right to object) of the Regulation, and – if the processing was already unlawful during the data subject's lifetime or the purpose of processing ceased upon the data subject's death – under Articles 17 (right to erasure) and 18 (right to restriction of processing) of the Regulation. The close relative who first exercises this entitlement is entitled to exercise the data subject's rights under this paragraph.

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VII.RIGHT TO LEGAL REMEDY IN RELATION TO DATA PROCESSING

In order to exercise their right to judicial remedy, the data subject may bring an action before the court against our Company if they consider that our Company, or a data processor engaged by us or acting on our instructions, or a joint controller, is processing their personal data in breach of the requirements laid down in legislation on the processing of personal data or in a binding legal act of the European Union. The court shall handle the case as a matter of priority. The case falls within the jurisdiction of the regional court (törvényszék). At the data subject's choice, the action may also be brought before the regional court competent for the data subject's place of residence or stay, or for our Company's registered office (Pécs Regional Court).

Anyone may initiate an investigation against the Company by filing a notification with the National Authority for Data Protection and Freedom of Information (NAIH), alleging that an infringement has occurred in connection with the processing of personal data or that there is an imminent threat thereof, or that the Company restricts the exercise of their rights related to data processing or rejects their request to exercise those rights. The notification can be made using any of the following contact details:

Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH – Hungarian National Authority for Data Protection and Freedom of Information)
Postal address: 1363 Budapest, Pf.: 9., Hungary
Address: 1055 Budapest, Falk Miksa utca 9-11., Hungary

Telephone: +36 (1) 391-1400
E-mail: ugyfelszolgalat@naih.hu
URL: https://naih.hu

This notice enters into force on 10 November 2026 and replaces the notice that entered into force on 10 September 2021. If our data processing changes, we will update this notice and publish the current version on the website.

W5 Informatikai Kft.
Represented by: Zoltán Csepregi, Managing Director