

DATA PROCESSING NOTICE

Part I: Introduction

SUNRENT SOLUTIONS Private Limited Company (hereinafter referred to as the "Data Controller") issues this notice in order to comply with the following regulations. The aim is to ensure that all individuals concerned with the processing of personal data (partners of the Data Controller, hereinafter referred to as "data subjects") receive all relevant information and guidance in a concise, transparent, comprehensible, and easily accessible manner. Furthermore, this notice assists data subjects in exercising the rights outlined in this policy.

The Data Controller places great importance on protecting the personal data of the data subjects and respecting their informational self-determination rights. The Data Controller treats personal data confidentially and takes all necessary security, technical, and organizational measures to ensure the security of the data.

The processing of personal data is based on the following laws:

- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Infotv.)
- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)
- Act CVIII of 2001 on Electronic Commerce Services (Eker. tv.)
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising (Grt.)

Part II: Basic Information

1. Data Controller:

- Company name: SUNRENT SOLUTIONS Private Limited Company
- Headquarters: 1054 Budapest, Szabadság tér 7.
- Company registration number: 01-10-141595
- Registered by: Metropolitan Court of Budapest
- Tax number: 27480230-2-41
- Represented by: Kristóf Zoltán Horváth, CEO
- Email: rent@sunrent.io
- Website: <https://www.sunrent.io/contact>

2. Data Processor:

The Data Controller may use Data Processors in the course of its data processing activities outlined in this notice. If there is a change in the Data Processors, the Data Controller will inform the data subjects accordingly.

- **Data Processor Name:** GoDaddy Operating Company, LLC
- **Contact:** HQ@godaddy.com
- **Service Provided:** Hosting Services

3. **Amendments to This Notice:**

The Data Controller reserves the right to unilaterally change this notice without any time restrictions and will inform the data subjects of any changes in due time and in an appropriate manner. Amendments may be necessary primarily to comply with legislative requirements.

This notice is valid until revoked and applies to the Data Controller's officers, employees, and data protection officers (if applicable), as well as to all data subjects whose personal data is processed by the Data Controller.

4. **Definitions:**

The Data Controller uses the terms as defined in the Infotv. and GDPR in its data processing activities and in this notice.

Part III: Processing of Personal Data

1. **Newsletter and Marketing Communications:**

Visitors to the Data Controller's website can subscribe to newsletters to be informed about the latest promotions and offers.

- **Data Retention Period:** Personal data is processed for a maximum of 8 days after the data subject withdraws their consent or requests the deletion of their data.

2. **Data Processing During Contact:**

Data processing occurs when a question is directed to us via email, contact form, or phone regarding a product. Prior contact is not mandatory.

- **Data Processed:** Name, email address, other contact details as provided by the data subject.
- **Purpose:** To clarify questions during contact initiated by the data subject.
- **Legal Basis:** Consent of the data subject (GDPR Article 6(1)(a)).
- **Data Retention Period:** Personal data is processed for up to 8 days after the data subject withdraws consent or requests deletion. Personal data is deleted within 30 days after contact is concluded.

3. **Website Visits and Cookies:**

The Data Controller uses cookies on its website to store certain settings, facilitate website use, and gather relevant statistical information about visitors.

- **Legal Basis for Cookie Usage:** Consent under GDPR Article 6(1)(a).
- **Main Cookie Types Used:**
 - Strictly necessary cookies: Required for website functionality and limited to the session duration.
 - User experience improvement cookies: Collect anonymized information about website usage to improve performance.

Part IV: Other Data Processing Issues

1. **Right to Withdraw Consent:**

Data processing based on consent can only occur if the data subject gives voluntary, specific,

informed, and explicit consent through clear affirmative actions. Silence, pre-ticked boxes, or inactivity do not constitute consent. If the data subject withdraws consent, the withdrawal does not affect the legality of processing based on consent before its withdrawal.

2. Access to Data:

The Data Controller and its employees, as well as individuals engaged in providing services related to the Data Controller's operations, are authorized to access personal data solely for the purpose of fulfilling their duties.

3. Data Transfers:

The data of data subjects is only transferred within the legal framework, and data processors are bound by contractual conditions to ensure that personal data is not used contrary to the data subject's consent.

4. Data Security:

The Data Controller ensures the security of data subjects' data by implementing appropriate technical and organizational measures, including firewalls, encryption, and physical protection measures for locations where personal data is accessed.

Part V: Rights and Remedies for Data Subjects

1. Right to Access:

Data subjects have the right to request information from the Data Controller regarding whether their personal data is being processed. Upon request, the Data Controller must provide access to personal data and details on:

- The purposes of processing
- Categories of data processed
- The recipients of the data
- The data retention period

2. Right to Rectification:

Data subjects can request the modification or completion of their data. This must be addressed promptly, and confirmation must be provided within 30 days.

3. Right to Erasure ("Right to be Forgotten"):

Data subjects can request the deletion of their data if:

- The data is no longer needed for its original purpose
- Consent has been withdrawn
- The data was processed unlawfully

4. Right to Restriction of Processing:

Data subjects can request that processing be restricted under certain conditions, such as disputing the accuracy of data or if the data is needed for legal claims.

5. Right to Data Portability:

Data subjects can request the transfer of their personal data in a structured, machine-readable format to another Data Controller.

6. **Right to Object:**

Data subjects can object to the processing of their personal data based on legitimate interest.

Part VI: Legal Remedies for Data Processing Issues

1. Data subjects can lodge complaints with the Data Controller or directly with the National Authority for Data Protection and Freedom of Information (NAIH).
2. Data subjects may also file a civil lawsuit for unlawful data processing.
3. The Data Controller must provide information to the data subject within one month of receiving a request.