PRIVACY NOTICE

FOR PARTNERS AND ADVERTISERS

effective from: 15 August 2026

1 INTRODUCTION

Our company, Natív Hirdetés Kft., created the |related| intelligent content recommendation and native advertising system (hereinafter: System) to provide our contractual partners (hereinafter: Partner) with a solution for the efficient sale of unused inventory on their websites (hereinafter: Website) and to enable our advertisers (hereinafter: Advertiser) to publish their advertisements more simply and quickly and continuously monitor their performance.

When operating the System and when the services offered by us are used, processing certain personal data in connection with those activities is unavoidable. Throughout processing, we observe the principles of good faith, fairness, transparency, accuracy and accountability, while fully respecting and giving effect to our Partners' and Advertisers' rights relating to processing. Our processing arrangements have been designed in accordance with 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 (hereinafter: GDPR).

Our aim is to ensure that personal data is adequate and relevant to the purposes of processing and limited to what is necessary. During processing, we safeguard the confidentiality of the personal data we process and prevent unauthorised access.

2 CONTROLLER

name: Natív Hirdetés Korlátolt Felelősségű Társaság
registered office/mailing address: 1064 Budapest, Podmaniczky utca 57, 2nd floor, door 14.
website: www.related.hu
e-mail: office@nativhirdetes.hu

3 PROCESSOR

3.1. Our Company engages the following external company to perform tasks relating to the operation and development of the System and consequently to process personal data:

name: Mediadyn Korlátolt Felelősségű Társaság
registered office/mailing address: 9700 Szombathely, Váci Mihály utca 65, 4th floor, door 19.
e-mail: office@mediadyn.hu

3.2. Detailed information concerning the processor performing accounting activities for our Company is provided through the contact details in Section 2.

4 OUR PROCESSING ACTIVITIES

4.1 PROCESSING RELATED TO REGISTRATION

Both Partners and Advertisers must register - and thereby conclude a contract - in order to use the services of the System.

4.1.1 ADVERTISER REGISTRATION/CONCLUSION OF CONTRACT

CATEGORIES OF DATA PROCESSED	Our Company records and stores the metadata accompanying the request and confirmation processed on the registration interface, which also serves as the online contracting interface. Such data includes the name, address (registered office), tax number and name of the legal person's representative. Information concerning a legal person does not in itself constitute personal data; however, information capable of identifying the legal person's representative or contact person does constitute personal data and falls within the scope of the GDPR.
DATA SUBJECT	An Advertiser who is a natural person - including a sole trader - and the representative of an Advertiser that is a legal person.
PURPOSE OF PROCESSING	Making the System's services available and enabling advertisements to be published.
LEGAL BASIS	Processing of personal data is necessary for performance of the contract concluded with the Advertiser (Article 6(1)(b) GDPR).
RETENTION PERIOD	Having regard to Section 6:22(1) of Act V of 2013 on the Civil Code, the data is stored for the above purposes for five years after termination of the framework agreement.
POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA	The Advertiser cannot use the service provided by us.

4.1.2 PARTNER REGISTRATION/CONCLUSION OF CONTRACT

CATEGORIES OF DATA PROCESSED	Our Company records and stores the metadata accompanying the request and confirmation processed on the Registration Form as an online contracting interface. Such data includes the name, address (registered office), tax number, name of the account-holding financial institution, bank account number and name of the legal person's representative. Information concerning a legal person does not in itself constitute personal data; however, information capable of identifying the legal person's representative or contact person does constitute personal data and falls within the scope of the GDPR.
DATA SUBJECT	A Partner who is a natural person - including a sole trader - and the representative of a Partner that is a legal person.
PURPOSE OF PROCESSING	Making the System's services available and enabling advertisements to be published.

LEGAL BASIS	Processing of personal data is necessary for performance of the contract concluded with the Partner (Article 6(1)(b) GDPR).
RETENTION PERIOD	Having regard to Section 6:22(1) of Act V of 2013 on the Civil Code, the data is stored for the above purposes for five years after expiry or termination of the contract.
POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA	The Partner cannot use the service provided by us.

4.2 PROCESSING RELATED TO CONTRACTS CONCLUDED OUTSIDE THE SYSTEM

In certain cases, contracts with Partners and Advertisers concerning the publication of advertisements are concluded outside the System. In such cases, we carry out the following processing:

4.2.1 CONCLUSION OF CONTRACTS WITH ADVERTISERS

CATEGORIES OF DATA PROCESSED	Our Company records and stores the metadata accompanying the contract. Such data includes the name, address (registered office), tax number and, where the Advertiser is a legal person, the representative's name. Information concerning a legal person does not in itself constitute personal data; however, information capable of identifying the legal person's representative or contact person does constitute personal data and falls within the scope of the GDPR.
DATA SUBJECT	An Advertiser who is a natural person - including a sole trader - and the representative of an Advertiser that is a legal person.
PURPOSE OF PROCESSING	Use of our Company's services.
LEGAL BASIS	Processing of personal data is necessary for performance of the contract concluded with the Advertiser (Article 6(1)(b) GDPR).
RETENTION PERIOD	Having regard to Section 6:22(1) of Act V of 2013 on the Civil Code, the data is stored for the above purposes for five years after expiry or termination of the contract.
POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA	The Advertiser cannot use the service provided by us.

4.2.2 CONCLUSION OF CONTRACTS WITH PARTNERS

CATEGORIES OF DATA PROCESSED	Our Company records and stores the metadata accompanying the contract. Such data includes the name, address (registered office), tax number, name of the account-holding financial institution, bank account number and name of the legal person's representative. Information concerning a legal person does not in itself constitute personal data; however, information capable of identifying the legal person's representative or contact person does constitute personal data and falls within the scope of the GDPR.
DATA SUBJECT	A Partner who is a natural person - including a sole trader - and the representative of a Partner that is a legal person.
PURPOSE OF PROCESSING	Use of our Company's services.

LEGAL BASIS	Processing of personal data is necessary for performance of the Contract concluded with the Partner (Article 6(1)(b) GDPR).
RETENTION PERIOD	Having regard to Section 6:22(1) of Act V of 2013 on the Civil Code, the data is stored for the above purposes for five years after expiry or termination of the contract.
POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA	Our Partner cannot use the service provided by us.

4.3 PROCESSING OF CONTACT PERSONS' PERSONAL DATA

CATEGORIES OF DATA PROCESSED	Contact person's name, business telephone number and business e-mail address.
DATA SUBJECT	Contact person.
PURPOSE OF PROCESSING	Maintaining contact with business Partners, whether legal or natural persons, and Advertisers that have or establish a relationship with our Company; facilitating contract conclusion; and resolving questions and requests arising in connection with contract performance efficiently and quickly.
LEGAL BASIS	Our Company processes contact details on the basis of its legitimate interest (Article 6(1)(f) GDPR).
RETENTION PERIOD	Our Company processes the Contact Person's data until the date on which the Contact Person's employment ends or until the designation as contact person ends and, following expiry or termination of the contract, until the end of the limitation period under Act V of 2013 on the Civil Code, namely five years. If the Contact Person's employment ends, the Partner and Advertiser must notify our Company, and the Contact Person may also do so. Following notification, our Company shall delete the data without delay.
POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA	Failure to provide data may prevent conclusion of the contract or contact between the Partner or Advertiser and our Company.

4.4 PROCESSING RELATED TO ISSUING INVOICES

CATEGORIES OF DATA PROCESSED	Name, address (registered office), tax number.
DATA SUBJECT	An Advertiser who is a natural person, including a sole trader.
PURPOSE OF PROCESSING	Issuing an invoice and complying with accounting obligations.
LEGAL BASIS	Processing based on a legal obligation (Article 6(1)(c) GDPR, with regard to Sections 166(1)-(3) of Act C of 2000 on Accounting).
RETENTION PERIOD	Eight years after the accounting document is issued (Sections 166(6) and 169 of Act C of 2000 on Accounting).
PROCESSOR	The person performing the accounting activities. The Controller shall provide information identifying that person upon separate request.
RECIPIENT	Competent tax authority.

4.5 PROCESSING RELATED TO PAYMENT BY BANK TRANSFER

CATEGORIES OF DATA PROCESSED	Data relating to the transfer: name, bank account number, amount and date of transfer.
DATA SUBJECT	An Advertiser who is a natural person, including a sole trader.
PURPOSE OF PROCESSING	Payment of the fee for the service provided by our Company.
LEGAL BASIS	Processing is necessary for performance of a contract (Article 6(1)(b) GDPR).
RETENTION PERIOD	Eight years after the accounting document is issued (Sections 166(6) and 169 of Act C of 2000 on Accounting).
PROCESSOR	The person performing the accounting activities. The Controller shall provide information identifying that person upon separate request.
RECIPIENT	Competent authority. For payment by bank transfer, payment transaction data is processed by OTP Bank Nyrt.
POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA	The data subject cannot pay the invoice by bank transfer and cannot use our Company's service.

4.6 PROCESSING RELATED TO CONTACT REQUESTS

CATEGORIES OF DATA PROCESSED	We provide the opportunity to contact us both through our website and using the contact details in Section 2. Depending on the form of contact, a name, mailing address, e-mail address and/or telephone number is provided.
DATA SUBJECT	Person initiating contact.
PURPOSE OF PROCESSING	We need the data to respond to enquiries by telephone, letter or return e-mail. Apart from responding to enquiries, we do not use the data provided for any other purpose or for any subsequent contact.
LEGAL BASIS	Processing of personal data is based on freely given consent (Article 6(1)(a) GDPR).
RETENTION PERIOD	We process the personal data provided for no more than one year after sending the response to the request for information, or until consent is withdrawn.
POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA	If the personal data necessary for responding (depending on the method of contact: e-mail address, telephone number, name and address) is not provided, our Company will be unable to answer the question or problem raised.

4.7 PROCESSING RELATED TO SYSTEM SECURITY

CATEGORIES OF DATA PROCESSED	To ensure safe operation of the System, we log the following data: the IP address of the computer initiating access; the date and time of access/request; the type and version number of the browser used; and the type of operating system used (hereinafter collectively: log file data). We also place on the user's

	computer a cookie that is strictly necessary for operation.
DATA SUBJECT	User.
PURPOSE OF PROCESSING	We need the data to ensure safe operation of the System and prevent unauthorised access to the System and the data stored in it.
LEGAL BASIS	Our legitimate interests are to ensure lawful and secure operation of the System, filter out unlawful use, protect the site against external attacks and ensure proper operation of the site (Article 6(1)(f) GDPR).
RETENTION PERIOD	Log file data is stored for no more than 60 days after recording. This period is necessary to identify potential errors, fraud and unlawful use.
PROCESSOR	Operator and developer of the System.

4.8 PROCESSING RELATED TO NEWSLETTERS

CATEGORIES OF DATA PROCESSED	Name, e-mail address
DATA SUBJECT	Natural-person contact persons acting on behalf of legal persons and sole traders.
PURPOSE OF PROCESSING	Business contact, presenting our services, sending professional and commercial offers, and maintaining and developing business relationships.
LEGAL BASIS	Processing is based on the data subject's consent under Article 6(1)(a) GDPR.
RETENTION PERIOD	We process the data until consent is withdrawn.
PROCESSOR	Our Company uses the Mailchimp service [The Rocket Science Group LLC (405 N Angier Ave NE, Atlanta, GA 30308, USA)] to send electronic newsletters.
TRANSFER OF DATA TO A THIRD COUNTRY	Personal data may be transferred to a third country outside the European Union (United States). The transfer takes place on the basis of an adequacy decision of the European Commission.

4.9 PROCESSING RELATED TO COOKIES

Type of cookie used by us:

- *Session cookie: This cookie is nece*ssary for operation of the System, without which the Customer Portal would not function at all or would not function as intended. It may lawfully be used without the data subject's consent on the basis of our Company's legitimate interest.

When the Customer Portal, the part of the System accessible to Advertisers and Partners (hereinafter: Customer Portal), is visited, the following cookies are placed on your computer:

Cookie name	Source	Purpose and categories of data collected	Validity period	Legal basis
related_session	first party	Strictly necessary for operation of the Customer Portal. Without this cookie, the User could not log in or switch between pages without repeated authentication by the Customer Portal. Without the cookie, the Customer Portal would be practically unusable.	Two hours after the last activity.	The Customer Portal's operability and the provision of its basic functions constitute the Controller's legitimate interest (Article 6(1)(f) GDPR).

remember_web_*	first party	Persistent login identifier token intended to allow the User, by using the optional "Keep me signed in" function, to access the interface later without logging in again.	Automatically deleted from the User's device after no more than 14 days.	User consent (Article 6(1)(a) GDPR).

The cookie used is not suitable for profiling or displaying behaviour-based advertising. The technical solutions used are also not suitable for uniquely identifying users or tracking their behaviour over the long term.

Please note that cookies can be deleted or disabled in the browser, as most browsers support cookie management. If a data subject does not want cookies to be placed on their computer, they may configure the browser's "Options" or "Settings" menu to prevent cookies from being placed. Individual cookies may be manually deleted, stopped or completely blocked through those settings. The data subject may also allow cookies only on selected websites. Please note, however, that disabling cookies may make certain functions of the System unavailable.

The following links may assist with browser settings:

- Chrome: https://support.google.com/chrome/answer/95647
- Edge: https://support.microsoft.com/hu-hu/microsoft-edge/cookie-k-törlése-és-kezelése-a-microsoft-edge-ben-168dab11-0753-043d-7c16-ede5947fc64d
- Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer
- Safari: https://support.apple.com/hu-hu/guide/safari/sfri11471/mac

5 DATA TRANSFERS, PROCESSING AND PERSONS AUTHORISED TO ACCESS DATA

Our Company does not disclose personal data processed by it to third parties or authorities unless required by law or an official decision or the Partner or Advertiser has given prior consent. Before responding to any official request for data, we always examine whether the data may be lawfully transferred.

Our Company transfers data to a third country only in the cases specified in this Notice (particularly when using the newsletter service).

In addition to our Company's employees, Mediadyn Kft., as developer and operator of the System and Processor, has access to the data.

The natural or legal person performing the accounting activities, acting as Processor, has access to accounting documents and the associated personal data. Detailed information identifying the person engaged to perform the accounting activities may be requested from our Company using any of the contact details in Section 2.

Data may be transferred to processors without the data subjects' separate consent.

The servers storing the personal data processed are located in the data centres of Rackforest Kft. (1132 Budapest, Victor Hugo utca 11), a server hosting provider acting as an additional processor. Authorised employees of Rackforest Kft. have physical access to the machines.

When advertisements are displayed, only the technical data necessary for publication is transferred to Partners. Partners may process that data in accordance with their own privacy policies.

6 INFORMATION ON DATA SECURITY MEASURES

Both our Company and the processors identified in this Notice store and process data in a closed and continuously monitored IT environment in order to protect the personal data processed. They ensure that unauthorised persons cannot access, modify, remove or copy personal data. We also ensure that the processing system can be restored following a service disruption, remains operational, produces reports on errors occurring during operation and prevents stored personal data from being altered through incorrect operation of the system. Within this framework, we implement measures protecting against unauthorised access, including software and hardware protection and physical security (access controls and network security). Our computers are password-protected

and our systems are kept up to date. They are protected by firewalls against potential external attacks. Data files can be restored from regular backups. Paper documents are kept in locked filing cabinets. The System uses enhanced protection (HTTPS protocol).

7 DATA SUBJECTS' RIGHTS AND REMEDIES

RIGHT TO INFORMATION (Article 13 GDPR)	The data subject has the right to receive clear information from our Company about the material circumstances of our processing activities. This Privacy Notice gives effect to that right.
RIGHT OF ACCESS (ARticle 15 GDPR)	In addition to the information in this Notice, the data subject has the right to obtain confirmation from us as to whether we process personal data relating to or capable of being associated with them. If so, the data subject may access that data and learn the purposes of the related processing and its intended duration. The data subject may receive information about potential recipients, data transfers and other material circumstances of processing.
RIGHT TO RECTIFICATION (Article 16 GDPR)	The data subject may request that we correct their personal data and, within the purposes of processing, complete it if they find that it is inaccurate, incorrect or incomplete.
RIGHT TO ERASURE (Article 17 GDPR)	The data subject may request erasure of their personal data in the following cases (unless restricted by law): - where our Company no longer needs the data subject's personal data for the purpose for which it was collected or processed; - where processing was based on the data subject's consent, the data subject has withdrawn consent, and there is no other legal basis for processing; - where the data subject objects to processing and, following the balancing test, the data subject's interests are found to override our Company's interests; - where processing is carried out for direct marketing and the data subject objects to processing; - where the data subject's personal data has been processed unlawfully; - where required by law; - in the case of processing relating to the offer of information society services. The right to erasure is limited by the rights to freedom of expression and information (Article 17 GDPR). Where processing is based on consent under Article 6(1)(a) GDPR, the data subject may withdraw consent previously given to processing at any time. If there is no other legal basis for processing the personal data, we shall permanently and irreversibly delete it after consent is withdrawn. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
RIGHT TO RESTRICTION OF PROCESSING (Article 18 GDPR)	The data subject may restrict use of their personal data if they contest its accuracy, correctness or completeness. The data subject may also restrict use of their personal data where processing is unlawful and they oppose erasure of the data. Restriction may

	also be requested where our Company no longer needs the personal data for processing purposes but the data subject requires it for the establishment, exercise or defence of legal claims, or where the data subject has objected to processing. Where restriction relates to clarification of the accuracy of personal data, it may be maintained while our Company verifies that accuracy. Where the data subject has objected to processing, restriction may be maintained until it is established whether our Company's legitimate grounds override the data subject's interests.
RIGHT TO DATA PORTABILITY (Article 20 GDPR)	Where data has been provided to us on the basis of the data subject's freely given consent, or where processing is based on a contract, the data subject has the right to receive a copy of their data in a machine-readable (doc, docx or xml) and conventional format and to have that data transmitted to another controller without hindrance.
RIGHT TO OBJECT (ARticle 21 GDPR)	The data subject may object at any time, on grounds relating to their particular situation, to processing of their personal data where our Company has based processing on a legitimate interest. In that case, the data may be processed further only if we demonstrate compelling legitimate grounds for processing that override the data subject's interests, rights and freedoms, or grounds relating to the establishment, exercise or defence of legal claims.

Our Company shall notify every recipient to whom personal data has been disclosed of any rectification, erasure or restriction of processing carried out by us, unless this proves impossible or involves disproportionate effort. Upon request, we shall inform the data subject about those recipients.

8 TIME LIMIT FOR ACTION

A request relating to the exercise of a data subject's rights may be submitted in writing or electronically using any of the contact details in Section 2.

We shall decide on the request without undue delay and no later than within one month after receipt and shall inform the data subject of the action taken. Where necessary, this period may be extended by two months.

9 DATA SUBJECTS' RIGHTS RELATING TO PROCESSING

If a data subject believes that their rights relating to the protection of their personal data have been infringed, they are urged to contact us using any of the contact details in Section 2 so that the complaint can be investigated and any infringement remedied as quickly as possible.

Civil proceedings may be brought before the competent court to remedy a potential infringement. Such proceedings fall within the jurisdiction of a regional court and may also be commenced before the regional court with jurisdiction over the data subject's domicile or place of residence. The court shall hear the case as a matter of priority.
Further information and contact details for regional courts are available at: http://birosag.hu/torvenyszekek

The data subject may also lodge a complaint with the competent supervisory authority *(Hungarian National Authority for Data Protection and Freedom of Information; registered office: 1055 Budapest, Falk Miksa utca 9-11; mailing address: 1363 Budapest, Pf. 9; telephone: +36 (1) 391 1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu*).