

Privacy Policy of BÉTx Financial Ltd.

6 May 2026

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I. Introduction

It is a key objective of BÉTx Pénzügyi Zrt. (BÉTx Financial Ltd., hereinafter referred to as “BÉTx”) to protect the personal data of natural persons and respect their right to informational self-determination. Throughout its data processing, BÉTx pays particular attention to the compliance with the privacy regulations in force, in particular 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: General Data Protection Regulation or GDPR).

If you have any comments about this policy, please inform us via info@betx.hu and our colleagues will contact you. BÉTx implements appropriate technical and organizational measures to ensure lawful and secure data processing.

II. Contact and identity details of BÉTx as data controller

Registered Seat: HU-1013 Budapest, Krisztina körút 55., 6th floor

Contact: Phone: +36 30 304 9488 (available on workdays between 9 a.m. and 5. p.m.)
Email: info@betx.hu
Mail: HU-1013 Budapest, Krisztina körút 55., 6th floor

III. Data processing by BÉTx

1. Cookies of the www.betx.hu (Website)

We use cookies to operate our Website. Cookies are small data files stored by the Website on your device suitable for web browsing, and later the cookies may be read from there.

We use ‘persistent’ cookies making the use of the Website convenient. You may delete the cookies from your device, or you may disable cookies in the Privacy/History/Personal settings menu of the Tools/Settings menu of your browser.

Please note that if Cookies are disabled, certain features of the Website may not or not operate properly or as intended, and it may make the Website display incorrectly.

‘Persistent’ cookies store information about your device and browser in order to ensure the proper operation of the Website’s functions.

The use of ‘persistent’ cookies is in the legitimate interest of BÉTx, since BÉTx pays particular attention to that any investor, issuer and trader be able to access the information displayed on the Website in a readily structured form, and by these means the control of ‘persistent’ cookies also serve the visitors’ interests. You cannot be identified by the data read from the ‘persistent’ cookies.

The ‘persistent’ cookies are erased after use, when the browser is closed.

2. Clients and partners, ultimate beneficial owners

BÉTx processes the following personal data of clients using its services, and in the case of non-natural persons, of their representatives, and of those entitled to dispose of the services (and for the purpose of preventing money laundering and terrorist financing, of the beneficial owners), for the purposes indicated below.

Scope	Purpose	Legal Basis	Duration
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identification data (name, birth name, address, place and date of birth, mother's name, tax ID, nationality)	a) Reception, transmission and execution of orders b) Preventing anti-money laundering and countering the financing of terrorism	a) GDPR Article 6 Senction 1 Paragraph f) legitimate interest, BÉTx is unable to provide its services and contractual and legal obligations in the absence of the processing of the above data b) GDPR Article 6 Senction 1 Paragraph c) legal obligation	a) Bszt. ¹ 86. § five years from the performance or termination of the contract b) 8 years from the end of the business relationship
copy and details of a document proving identity (identity card, proof of address - except for the personal identification number on the back of the card -, passport);	Preventing anti-money laundering and countering the financing of terrorism	GDPR Article 6 Senction 1 Paragraph c) legal obligation	8 years from the end of the business relationship
contact details (telephone number, e-mail address, electronic access) and electronic messages during contact	Reception, transmission and execution of orders; performing statutory obligations to provide information and to cooperate	GDPR Article 6 Senction 1 Paragraph f) legitimate interest, BÉTx is unable to provide its services and contractual and legal obligations in the absence of the processing of the above data	Limitations period according to the Civil Code, i.e. 5 years
generated personal code and legal identifier (e.g. client code, MiFID identifier)	Reception, transmission and execution of orders	GDPR Article 6 Senction 1 Paragraph f) legitimate interest, BÉTx is unable to provide its services and contractual and legal obligations in the absence of the processing of the above data	Bszt. ¹ 86. § five years from the performance or termination of the contract
orders and related data (e.g. date, financial instrument involved, execution data, receipts, etc.)	Reception, transmission and execution of orders	GDPR Article 6 Senction 1 Paragraph f) legitimate interest, BÉTx is unable to provide its services and contractual and legal obligations in the absence	Bszt. ² 86. § five years from the performance or

¹ Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities

² Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities

		of the processing of the above data	termination of the contract
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The processing of the above data is processed on the one hand out of legitimate interest, to perform BÉTx's services and contracts, on the other hand to fulfill its legal obligations. Based on the relevant sectoral legislation (Bsz.²) and the contracts concluded with clients, in the absence of the above data processing, BÉTx services may not be used. Some of the above data may also be classified as securities secrets, to which Sections 117 - 120/A. of the Bsz.² apply. The processed personal data necessarily restricts the data subject's right to informational self-determination and restricts the data subject's privacy, given that the data subject cannot dispose of their personal data without restriction. The data controller cannot ensure the purpose of the data processing in any other way, since these data must be recorded due to the provisions of Bsz.², and are essential for the subsequent, accurate traceability of the performance of the service contracts. The processed data are essential for the performance of contracts, and in view of BÉTx's strict confidentiality obligation and data protection solutions, they only marginally restrict the rights of the data subject. Based on the above, the interest in data processing exceeds the interests of the data subject, it is necessary and proportionate, and therefore the legitimate interest of the employer is well-founded.

3. Data processing of contact persons and representatives of business partners

BÉTx stores the personal data of its business partners' representatives and persons authorised desposing BÉTx services, for the purposes of keeping in touch and for identification.

BÉTx processes the contact persons' name, title, and e-mail address.

BÉTx processes the data used for contact purposes on the basis of its legitimate interests. Data processing is essential in order to BÉTx and its business partners meet their co-operation obligations based on the legal relationships existing between them. The processed personal data are at a low risk for data subjects, as these are the data needed for everyday communication.

4. Contacting BÉTx

If you contact BÉTx, your personal data provided by you in your e-mail or letter will be processed by BÉTx on your consent. The purpose of data processing is to keep in touch with you. Such personal data are in particular your contact details, such as your email address, address and name. BÉTx will erase such personal data when your consent is withdrawn or after 31 January of the year following the lapse of the limitation period (generally 5 years).

5. Contact Initiated by BÉTx

BÉTx processes the names, positions, e-mail addresses and possibly phone numbers of officers of BÉTx's potential partners in order to initiate contact with them. Information on potential partners are collected from public databases (especially Opten's corporate information) or from the public websites of the partners or other service providers. The data stored for this purpose will be erased by the BÉTx, if no contact is made for at least two years after the data has been recorded. BÉTx shall delete such data at latest at 31 January of the year following the expiration of this two-year term.

6. Data processing related to job applications

Personal data contained in job applications submitted to the BÉTx will be processed by the BÉTx on your consent. BÉTx processes the job applications after giving consent to it until 31 January of the year following the closing of the given job application, in order to use the application materials in such a case if the BÉTx is looking for new applicants for a similar position.

BÉTx may submit the applicant's data to the Hungarian Central Bank (Magyar Nemzeti Bank Zrt., registered seat: 9 Szabadság tér, Budapest 1054) for information purposes.

BÉTx processes the personal data given by the applicant in the course of contacting BÉTx or in their application for the purpose of evaluating the application. BÉTx processes the data of the applicants in particular: name, e-mail address, address, phone number, qualification and professional experience.

7. Handling complaints

If you file a complaint, the personal information you provide and the complaint itself will be processed by BÉTx for the purpose of handling the complaint and contacting you. In the course of handling complaints, in particular, the name, address, mailing address and telephone number of the complainant are processed by the BÉTx.

The personal data provided during the handling of the complaint is processed by the BÉTx on the basis of its legitimate interests as the detection and investigation of the complaint is utterly important for BÉTx to provide its services at the highest possible level.

BÉTx pays particular attention to the confidentiality of complaints and makes all reasonable efforts to make any complaints available only to those who take part in its examination.

The personal data provided through the course of handling the complaint is erased by BÉTx by 31 January of the year following the lapse of the limitation period (general limitation period: 5 years). If justified, BÉTx may transmit the data to the competent authorities.

8. Data processing regarding whistleblowing

The whistleblowing system provides the opportunity to report to BÉTx any breach of law by persons employed by BÉTx with any legal relationship. The purpose of the data processing is to detect, eliminate and prevent any abuse by BÉTx employees. The data processing is necessary to comply with BÉTx's legal obligations set forth in Act CLXV of 2013 on complaints and public reports.

The personal data of the whistleblowers may not be disclosed without their explicit consent. If a report of public interest is made maliciously which contains material and false information and this report causes damage or the circumstances indicating commitment of a criminal offense or a misdemeanor, the personal data of the whistleblower will be transmitted to the competent authorities.

The content of the report may be disclosed solely to the internal auditor of BÉTx and to the persons involved in the investigation appointed by the internal auditor. The internal auditor stores data, facts and documents separate from their record keeping system, in a password-protected, separate register.

Any special categories of personal data and data of third parties not involved in the report provided by the whistleblower which are not required for the investigation and data that may not be processed under the applicable law, will be deleted by BÉTx without delay.

If the report is not well grounded or no further action is required based on the outcome of the investigation, the data contained in the report will be deleted within 60 days of the completion of the investigation, otherwise BÉTx will process the data until the finalization of the procedures initiated by the notification.

9. Other data processing

BÉTx will inform the data subjects directly of any other data processing not listed in this statement under the applicable laws. BÉTx may transfer the processed personal data in cases specified by law.

IV. General data transfers

BÉTx transfers the processed personal data – in addition to the cases specified above – to the following persons:

1. Budapest Stock Exchange Plc.

BÉTx uses several IT services of its parent company, the Budapest Stock Exchange Plc (1013 Budapest, Krisztina körút 55., floor VI) under an outsourcing framework agreement. When using the services, data processing operations are partly carried out on the infrastructure operated by the

Budapest Stock Exchange Plc., therefore, the Budapest Stock Exchange Plc. acts as the data processor of BÉTx. The Budapest Stock Exchange Plc., as a stock exchange, is subject to strict data protection requirements equivalent to the prudential requirements applicable to BÉTx.

2. Third Parties in Order Execution

In order to execute orders, personal data may be transferred to third-party investment firms, or to the clearing provider KELER Central Securities Depository Zrt. (registered office: 1074 Budapest, Rákóczi út 70-72.) and KELER KSZF Central Counterparty Zrt. (1074 Budapest, Rákóczi út 70-72.). As financial institutions, the above organizations are subject to strict requirements in terms of data protection equivalent to the prudential requirements applicable to BÉTx.

3. Forrai Law Firm

BÉTx's general agent is Forrai Law Firm in legal and compliance affairs, therefore, personal information may be transferred to the Forrai Law Firm in order to perform its duties regarding legal affairs and tasks as head of compliance.

Registered seat of Forrai Law Firm: HU-1024 Budapest, Fény utca 15. mezzazine floor 4.

4. Bótor Anikó

BÉTx is the general agent of BÉTx with regard to internal audit activities. In the course of performing her duties, the internal auditor has unlimited access to the data managed by BÉTx, therefore, BÉTx may transfer personal data to her for the performance of her internal audit duties. The internal auditor can be contacted through BÉTx's contact details.

V. Rights of the data subjects

You have the right – as data subject – to request the erasure, restriction or rectification of your personal data, to receive information about or access to your personal data, to object to the data processing or request the transfer of data. The rights of the data subjects may be exercised by written requests sent to BÉTx's contact address specified in Section II. BÉTx provides information on the data subjects in the same manner the request was made by them. In case of any request regarding the rights of data subjects, BÉTx shall take actions and provide information on the request and the measures taken within one month of the request, which deadline may be extended by 2 months, if necessary, due to the complexity or the large number of requests. BÉTx will respond free of charge to data subjects' requests, unless the request is manifestly unfounded or excessive (e.g. a mass request for the same data), in which case the BÉTx may charge a reasonable fee or refuse to act on the request.

1. Right to be informed

BÉTx ensures to inform the data subjects about the process of personal data specified in Article 13 of the GDPR in the manner specified in the regulation (in a concise, transparent, intelligible and easily accessible form, using clear and plain language).

2. Right to access

The data subject shall have the right to obtain confirmation from the controller as to whether or not personal data concerning him or her are being processed, and, access to 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 personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- 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 information for at least about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
- j) providing a copy of the processed personal data for the data subject.

3. Right to rectification

The data subject has the right that upon his or her request BÉT_x rectify or complete the inaccurate or incomplete personal data concerning the data subject.

4. Right to erasure

The data subject has the right that upon his or her request the data controller erase the personal data concerning him or her without undue delay, if one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes specified hereinabove;
- b) the data subject withdraws consent on which the processing is based and where 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;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with the applicable laws;
- f) the personal data have been collected in relation to the offer of information society services.

5. Right to restriction of processing

The data subject has the right that upon his or her request the data controller restricts the processing personal data concerning him or her, if one of the following grounds applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller 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 defense of legal claims and the data subject requests the restriction of processing; or
- d) the data subject has objected to processing not based on his or her consent; in which case the restriction shall last until the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

6. Right to data portability

The data subject has the right that upon his or her request the data controller transmits the processed personal data concerning him or her to another data controller (specifying the contact data of the other controller) in Microsoft Excel file format.

7. Right to withdrawal

The data subject has the right to withdraw his or her consent regarding the process of personal data at any time, however, the withdrawal shall not affect the lawfulness of the data processing prior to such revocation.

8. Right to object to the processing of personal data

The data subject has the right to object to the processing of personal data, if such processing is based on other legal grounds than the data subject's consent or performing contractual obligations.

If the objection is justified, the controller shall no longer process the personal data and erase the data or upon the data subject's request restrict their processing unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, upon objection, BÉTx shall no longer process the data involved in the objection.

9. Damages

Data subjects are eligible for compensation who suffer damages as a result of an infringement of the relevant laws by the data controller or processor and it is imputable to the infringing person.

10. Right to remedy

If you have any comments or concerns regarding the data processing of BÉTx, please contact the Data Protection Officer specified in Section II with confidence.

In the event of infringement of the data subject's rights, the person concerned is entitled to file a high priority case at court.

In addition to the above, you can file a complaint at the National Privacy and Information Authority (registered seat: HU-1055 Budapest, Falk Miksa utca 9-11, postal address: HU-1363 Budapest, P.O. BOX 9, phone: +36 (1) 391-1400, e-mail: ugyfelszolgalat@naih.hu) as well.