

1. Introduction

This Privacy Policy ("**Policy**") provides information on the personal data processing by BYD Electric Bus & Truck Hungary Kft. in Hungary, a private company with limited liability established under Hungarian law, having its statutory seat in Hungary, and its registered office at 8 Puskás Tivadar, Komárom, Hungary (hereinafter individually and collectively referred to as: "**BYD Hungary**")

BYD Hungary can be reached via the following contact details:

BYD Electric Bus & Truck Hungary Kft.

8 Puskás Tivadar, Komárom

2903 Hungary

Telephone number: +3634540840

Email address: privacy.hu@byd.com

BYD Hungary is part of the global group of companies of BYD Company Limited with its headquarters in Shenzhen, China.

This Policy applies for all personal data processed by BYD Hungary and/or on behalf of BYD Hungary, which identify or may identify a person ("**Personal Data**"). These persons involved are hereinafter collectively referred to as data subjects ("**Data Subjects**").

BYD Hungary reserves the right to review and/or alter the Policy periodically, in order to comply with (local and/or Hungarian) legislation, and for any other purpose deemed reasonably necessary by BYD Hungary.

For queries and inquiries about this Policy, please contact: privacy.hu@byd.com.

2. Handling of Personal Data

This Policy sets out the elements necessary for BYD Hungary's compliance with applicable privacy legislation, principles and practice, including but not limited to the General Data Protection Regulation (GDPR) ("**Applicable Laws**").

The Policy is an external policy, and is directed towards Data Subjects who's Personal Data are being processed by BYD Hungary for the purpose of producing and delivering products and services. This Policy applies to the processing of Personal Data, in which BYD Hungary acts as the data controller within the meaning of the Applicable Laws. This is the case when BYD Hungary determines the purpose for and the means for the processing of Personal Data of Data Subjects within the purposes of this policy.

For business purposes, Data Subjects may be asked to provide their Personal Data. If this is the case, BYD Hungary and its partners shall be required to keep such information confidential.

3. Personal Data

Personal Data mentioned herein and defined by BYD Hungary refers to information of all kinds related to each Data Subject -- their name, email address, telephone number, and so on -- that are transmitted to BYD Hungary by Data Subjects.

The categories of Personal Data BYD Hungary processes are:

- name;
- last name;
- email address;
- telephone number (business and private);
- ID card;
- profession;
- attendance data;
- title;
- digital pictures of natural persons;
- signature;
- transferred amount;
- SAP code;
- bank account of suppliers.

4. Purpose and legal basis of data processing

The purposes of the processing of Personal Data by BYD Hungary are:

- payment of invoice and debt management;
- relationship management;
- maintaining contact with (potential) business partners/customers;
- handling purchase orders;
- safety and security purposes: physical safety of individuals, protection of property and against intrusion;
- contract management.

Legal grounds

BYD Hungary is obligated to process the Personal Data in accordance with these purposes and in compliance with the Applicable Laws. The data processing by BYD Hungary is necessary for the operation of activities, for which the Data Subject has given its explicit consent, or for the performance of a contract between BYD Hungary and the Data Subject, or for the performance of a legal obligation, or is necessary for the purposes of a legitimate interest pursued by BYD Hungary. The Data Subjects have the right to withdraw consent at any time. Also, when the processing is necessary for the performance of the contract between BYD Hungary and the Data Subject, the Personal Data processed is necessary to enter into a contract. Without providing the Personal Data, the contract cannot be made. The legitimate interests for which BYD Hungary processes Personal Data are: relationship management, marketing and PR activities contact form for offers and orders, and safeguarding the security of customers, visitors and property.

Retention period

BYD Hungary will not use and store Personal Data longer than necessary to fulfil the abovementioned purposes, and shall remove the collected Personal Data after the necessary period to achieve the purposes described in this Policy has passed, or to comply with contractual obligations or as permitted or required by the Applicable Laws. The retention period for Personal Data for the purposes of payment of invoice and debt management is 5 years and for the physical security 3 days.

5. Purpose limitation

The Personal Data may only be processed to the extent necessary for the described purposes. Personal Data may in principle not be processed for other purposes other than that for which the Personal Data were collected. If there is a necessity or need to process Personal Data for other purposes, it shall be investigated by BYD Hungary whether the purposes of the intended data processing is compatible with the original purposes. BYD Hungary shall provide the Data Subject prior to that further processing with information on that other purpose.

6. Security of Personal Data

BYD Hungary handles Personal Data carefully and confidentially, and uses all suitable physical, managerial, and technical safeguards to preserve the integrity and security of your Personal Data.

7. Transfer of Personal Data

Personal Data is being accessed or transferred by BYD Hungary and other third parties such as accounting companies, auditors, payroll company (SAP), data storage servers and security service companies.

In all cases, BYD Hungary will expressly state why such information is necessary, so that Data Subjects may provide the information at their own discretion. BYD Hungary will not disclose Personal Data provided by Data Subjects to any party, other than BYD Hungary itself, without prior permission from the Data Subjects.

BYD Hungary discloses Personal Data in case such disclosure is mandatory under Applicable Laws or is reasonably judged to be essential in order to protect and safeguard the rights, property and safety of other parties, BYD Hungary itself, and/or BYD Hungary's affiliates.

Circumstances may arise where, whether for strategic or other business reasons, BYD Hungary decides to sell, buy, merge or otherwise reorganize businesses. Such a transaction may involve the disclosure of

Personal Data to prospective or actual purchasers, or receiving it from sellers. It is BYD Hungary's practice to seek appropriate protection for information in these types of transactions.

BYD Hungary may transfer Personal Data to a third country or international organisations outside of the European Union/European Economic Area ("EU/EEA"), such as to Shenzhen, China, which shall take place only in compliance with the Applicable Laws, and where appropriate safeguards are in place that ensure the level of protection of Data Subjects as required by the Applicable Laws (e.g. transfers on the basis of an adequacy decision or standard EU Model clauses).

In certain circumstances, it is possible that Personal Data may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders.

8. Rights in relation to Personal Data

Data Subjects have the right of information, access, rectification, addition and erasure of Personal Data, and the right to object against or restrict the processing of Personal Data (or withdraw an earlier given consent), as well as the right to data portability. The procedure of BYD Hungary that enable Data Subjects to exercise these rights, is described below.

Data Subjects may file a request for access with BYD Hungary, and BYD Hungary shall respond as soon as possible, and in any event within one (1) month, about:

- a) whether BYD Hungary holds any Personal Data relating to the respective Data Subject; and,
- b) if so, information is provided on the purposes of the processing, the categories, the recipients (if applicable), the envisaged period for which the Personal Data will be stored, or the criteria used, the existence of the right to request rectification, erasure, restriction or to object to such processing, the right to lodge a complaint with a supervisory authority, the existence of automated decision-making, where the data is transferred to a third country, the appropriate safeguards and the source(s) of the Personal Data.

After a Data Subject has accessed the Personal Data, he/she may request BYD Hungary to correct, restrict, amend, add, erase and/or transport the Personal Data. BYD Hungary informs the Data Subject within one (1) month after receiving the request whether the request shall be complied with (in time), and if not, accompanied with the reasons for the delay or rejection.

Information provided shall be free of charge. Data Subjects can exercise these rights at reasonable intervals. Data Subjects can exercise their rights by contacting BYD Hungary (see address above) or send an e-mail to: privacy.hu@byd.com

BYD Hungary will comply with a legitimate request of a Data Subject for correction, restriction or erasure, if the Personal Data are factually incorrect, incomplete, or irrelevant for the purpose(s) of the data processing, or otherwise processed in violation with the Applicable Laws.

With regard to a request to erase Personal Data, it should be taken into account that BYD Hungary shall not comply with such request, if it is incompatible with any legal obligations of BYD Hungary.

If a request is allowed, BYD Hungary shall execute the decision to correct, amend, erase and/or transport the Personal Data as soon as possible.

In the event of concerns about the handling of Personal Data, Data Subjects also have the right to lodge a complaint with a local supervisory authority (in Hungary: the Hungarian Data Protection Authority, NAIH – Nemzeti Adatvédelmi Hatóság)).

9. Questions and inquiries

For queries and inquiries about this Policy of BYD Hungary, please contact: privacy.hu@byd.com

Annex 1: purposes of processing, legal grounds and retention periods.

Purpose of processing	Legal ground	Retention period
Camera surveillance; safety purposes	Legitimate interest	30 days
Contract data, daily communication, issue order, requests for quotations, business communication	Necessary for the performance of a contract/order	At least for the duration of the agreement, until the end of the warranty and/or claim period
Financial database; bookkeeping	Necessary for compliance with a legal obligation	10 years
Supplier database; pay invoices and receive credits	Necessary for the performance of a contract/order	10 years after the termination of supplier agreement