Data Processed by NETLOCK Kft.

Category of data subjects	Personal data processed	Purpose of the processing	Processing operations performed	Duration of the processing	Legal basis for the processing	Application supporting the processing / automated processing	Does data transfer or the engagement of a processor take place?	Purpose of the data transfer / the processor is engaged to perform the following tasks:	Name of the recipient or processor involved
customer	tax number	provision of the service, invoicing	collection / recording / gathering / storage / use	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract	shared electronic folders, SAP, OTRS, Gdrive	NO		
customer	tax number	record-keeping: storage of documents	use, retrieval	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	pursuit of a legitimate interest	shared electronic folders, data management software	NO		
customer	citizenship	provision of the service	collection / recording / gathering / storage / use	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from	compliance with a legal obligation, performance of a contract	shared electronic folders, data management software	NO		

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				the creation of the logged data					
customer	citizenship	record-keeping, storage of documents	use	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	pursuit of a legitimate interest	shared electronic folders	NO		
customer	mother's name	provision of the service, record-keeping: storage of documents	collection / recording / use / gathering, storage	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract, compliance with a legal obligation	shared electronic folders, Gdrive, OTRS, NCA, CAMS, SAP	NO		
customer	mother's name	provision of the service, record-keeping: identification of partners and distinguishing them from one another	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract	data management software	NO		
customer	bank account number	provision of the service, record-keeping: identification of partners and	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years	performance of a contract	data management software	NO		

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		distinguishing them from one another		- If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data					
customer	bank account number	invoicing, provision of the service	use	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract	Gdrive, OTRS, SAP	NO		
customer	e-mail address	provision of the service	collection / recording / use	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract, legitimate interest	shared electronic folders, data management software	NO		
interested party / potential customer	name, e-mail address, optionally telephone number, message (provided that the data subject can be identified from it, or it otherwise contains personal data)	booking a sales consultation appointment, confirming the booking, sending a reminder	collection / recording / storage / use / transfer / erasure	12 months from the booked appointment; in the event a contract is concluded, the duration of the contractual processing	taking steps at the request of the data subject prior to entering into a contract	Calendly, calendar synchronisation	YES	operating the appointment-booking service, storing the booking data, sending confirmation and reminder e-mails	Calendly, LLC (271 17th Street NW, 10th Floor, Atlanta, GA 30363, USA) https://calendly.com/ – transfer to the USA: on the basis of self-certification under the EU–U.S. Data Privacy Framework and standard contractual clauses under

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									Commission Decision 2021/914 (SCC, Module 2)
newsletter subscriber (customer, interested party)	e-mail address, name, the IP address at the time of subscription	marketing: sending electronic advertising messages / newsletters, proof of consent	collection / recording / storage / use / disclosure / erasure	until withdrawal of consent	consent	listmonk (self-hosted newsletter management tool)	NO	N/A	N/A
newsletter subscriber	e-mail address, and in connection with this, the fact and time of opening the newsletter, and the links clicked	measuring the effectiveness of newsletter campaigns	collection / recording / storage / retrieval / use for statistical purposes	12 months from sending; thereafter, aggregated statistics that do not permit identification	consent	listmonk (open- and click-tracking)	NO	N/A	N/A
newsletter subscriber / person who previously subscribed	e-mail address, and in connection with this, the time of unsubscription, and the fact, type and time of non-delivery (bounce)	fulfilling the unsubscribe request, preventing repeat contact, list hygiene	collection / recording / storage / retrieval / use	for as long as the newsletter service exists	legitimate interest (respecting the right to unsubscribe/object, and preventing repeated, unauthorised contact)	listmonk (suppression list, bounce processing)	NO	N/A	N/A
partner providing services (agent, contractor, etc.)	address, e-mail address	enforcement of legal claims	use	the duration of the enforcement of the claim	pursuit of a legitimate interest	data management software	NO except where an external legal representative or debt collector is engaged	enforcement of legal claims	if a processor is engaged in the given case, the data subject will be separately informed of this
contact person of the contractual partner	e-mail address	enforcement of legal claims	collection/storage	the duration of the enforcement of the claim	pursuit of a legitimate interest	shared electronic folders	NO except where an external legal representative or debt collector is engaged	enforcement of legal claims	if a processor is engaged in the given case, the data subject will be separately informed of this
contact person of the contractual partner	e-mail address	enforcement of legal claims	use	the duration of the enforcement of the claim	pursuit of a legitimate interest	shared electronic folders	NO except where an external legal representative or debt collector is engaged	enforcement of legal claims	if a processor is engaged in the given case, the data subject will be separately informed of this
contact person of the contractual partner	e-mail address	enforcement of legal claims	disclosure	the duration of the enforcement of the claim	pursuit of a legitimate interest	shared electronic folders	NO except where an external legal representative or debt collector is engaged	enforcement of legal claims	if a processor is engaged in the given case, the data subject will be separately informed of this
customer	home address	provision of the service	collection / recording / use / gathering, storage	- Termination of the contract (due to expiry	performance of a contract,	shared electronic folders, Gdrive, OTRS, NCA, CAMS, SAP	NO		

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				or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	compliance with a legal obligation				
customer	home address	provision of the service, record-keeping: identification of partners and distinguishing them from one another	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract	data management software	NO		
customer	postal address	provision of the service	collection / recording / gathering / storage / use	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	compliance with a legal obligation	Gdrive, OTRS, SAP	NO		
customer	name	provision of the service	collection / recording / use / gathering, storage	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal	performance of a contract, compliance with a legal obligation	shared electronic folders, Gdrive, OTRS, NCA, CAMS, SAP	NO		

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				- If the certificate application is discontinued for any reason, 10 years from the creation of the logged data					
customer	name	provision of the service, record-keeping: identification of partners and distinguishing them from one another	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract	data management software	NO		
customer	name	operation of the public certificate repository	use	until withdrawal of consent to the processing, or, failing that, until the certificate expires or is revoked	consent		NO		
customer	Permanent ID assigned to the certificate	identification of the subject of the certificate, i.e. the natural person assigned to the certificate	collection/storage/use	Termination of the contract (due to expiry or revocation of the certificate) + 10 years	performance of a contract		NO		
customer	logged data files containing personal data	business continuity, avoidance of data loss, ensuring IT security	collection/storage/use	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - for data logged outside of the certificate, 10 years from their creation	compliance with a legal obligation	data management software	NO		
customer	name, e-mail address	Official information relating to the service used by the customer.	use	termination of the contract + 6 months	pursuit of a legitimate interest	NOVU Cloud	YES	Uploading the e-mail address and, in some cases, the name to the newsletter system	Noti-Fire Apps Ltd. https://novu.co/
partner providing services (agent, contractor, etc.)	name	enforcement of legal claims	use	the duration of the enforcement of the claim	pursuit of a legitimate interest	data management software	NO except where an external legal representative or debt collector is engaged	enforcement of legal claims	if a processor is engaged in the given case, the data subject will be separately informed of this

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contractual partner / representative of the partner company using or providing the service	name	enforcement of legal claims	collection/storage/use	the duration of the enforcement of the claim	pursuit of a legitimate interest	shared electronic folders	NO except where an external legal representative or debt collector is engaged	enforcement of legal claims	if a processor is engaged in the given case, the data subject will be separately informed of this
contact person of the contractual partner	name	enforcement of legal claims	collection/storage/use	the duration of the enforcement of the claim	pursuit of a legitimate interest	shared electronic folders	NO except where an external legal representative or debt collector is engaged	enforcement of legal claims	if a processor is engaged in the given case, the data subject will be separately informed of this
customer - registrant (not concluding a service agreement)	name, e-mail address, home address, telephone number, ID card number, login name, password	customer registration on the website, customer records	collection / recording	15 days following receipt of the data subject's erasure request	consent	data management software	NO		
customer	online identifier	provision of the service, record-keeping: identification of partners and distinguishing them from one another	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract	data management software	NO		
customer	ID card number	provision of the service, record-keeping: identification of partners and distinguishing them from one another	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract	data management software	NO		
partner providing services (agent, contractor, etc.)	ID card number	enforcement of legal claims	use	the duration of the enforcement of the claim	pursuit of a legitimate interest	data management software	NO except where an external legal	enforcement of legal claims	if a processor is engaged in the given case, the data

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							representative or debt collector is engaged		subject will be separately informed of this
customer	ID card number	provision of the service	collection / recording / use / gathering, storage	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract, pursuit of a legitimate interest, compliance with a legal obligation	shared electronic folders, Gdrive, OTRS, NCA, CAMS, SAP	NO		
customer	ID card number	provision of the service	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract		NO		
customer	place and date of birth	provision of the service	collection / recording / use / gathering, storage	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract, legitimate interest, compliance with a legal obligation	shared electronic folders, Gdrive, OTRS, NCA, CAMS, SAP	NO		
customer	place and date of birth	provision of the service, record-keeping: identification of partners and	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years	performance of a contract	data management software	NO		

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		distinguishing them from one another		- If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data					
partner providing services (agent, contractor, etc.)	place and date of birth	enforcement of legal claims	use	the duration of the enforcement of the claim	pursuit of a legitimate interest	data management software	NO except where an external legal representative or debt collector is engaged	enforcement of legal claims	if a processor is engaged in the given case, the data subject will be separately informed of this
customer	name at birth	provision of the service	collection / recording / use / gathering, storage	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract	shared electronic folders, Gdrive, OTRS, NCA, CAMS, SAP	NO		
customer	place of residence	provision of the service	collection / recording / use / gathering, storage	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract, compliance with a legal obligation	shared electronic folders, Gdrive, OTRS, NCA, CAMS, SAP	NO		
customer	place of residence	provision of the service, record-keeping: identification of partners and	retrieval (e.g. querying the records)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years	performance of a contract	data management software	NO		

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		distinguishing them from one another		- If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data					
customer	telephone number	provision of the service	collection / recording / use / storage	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract, pursuit of a legitimate interest, compliance with a legal obligation	shared electronic folders, Gdrive, OTRS, NCA, TCTS, GLS, SAP	NO		
customer	passport number	provision of the service	collection / recording / use / gathering, storage	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	performance of a contract, compliance with a legal obligation, legitimate interest	shared electronic folders, Gdrive, OTRS, NCA, CAMS	NO		
customer	handwritten signature image	provision of the service	collection / recording / use / storage	until the uploaded image is deleted, or, failing that, until the contract (validity of the certificate) terminates	consent of the data subject		NO		
customer	telephone number	provision of the service; for the delivery of transactional and security push	use; the mobile application displays, as a push message, the so-called TOTP (Time-based One-Time Password) that serves as the second factor	Termination of the contract (due to expiry or revocation of the certificate) + 10 years	performance of a contract	Google Firebase Cloud Messaging service	YES, in respect of the unique identifier of the mobile device	to “address” the push messages, the NETLOCK mobile application sends the unique identifier of the mobile device running the mobile application	Google

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		messages by the NETLOCK mobile application; for the second-factor identification of the person initiating the signing transaction	required to identify the person initiating the signing transaction					to the Google Firebase Cloud Messaging service The process is described at https://firebase.google.com/docs/cloud-messaging	
customer	the audio recording of the telephone conversation with customer service, and the personal data contained therein	provision of the service	collection / recording / use / storage	5 years from the date of the call, except for calls relating to the suspension, reactivation and revocation of the certificate, for which the retention period is: termination of the contract (due to expiry or revocation of the certificate) + 10 years	legitimate interest		NO		
customer / applicant	video recording, photograph, sound recording, the data shown on the identity document (obtained via OCR), including biometric data derived from your facial image that is suitable for facial recognition and face matching (a special category of data under the GDPR)	identity verification (video-technology identification, with the support of artificial intelligence)	collection / recording / analysis (facial recognition and face matching, liveness detection, document recognition, OCR, voice-based verification)	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	compliance with a legal obligation; specific legal basis under Article 9(2) of the GDPR for processing special category data: point (a), the data subject's explicit consent	artificial intelligence-based solutions run exclusively within the Provider's own system (on-premise)	NO (the artificial intelligence-based processing takes place within the Provider's own system; no external AI service provider is engaged)		
customer	name, date of birth, home address, document number, telephone number	identity verification, sanctions list screening (KYC), quality assurance	transfer, retrieval	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	compliance with a legal obligation	external KYC service (not artificial intelligence-based)	YES	identity verification and sanctions list screening	Trulioo

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customer	document number, or name and date of birth → the full record and photograph held in the authentic public register	verification in an authentic public register	retrieval	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	compliance with a legal obligation	data management software	YES	verification of the authenticity and validity of the document data	Ministry of Interior (registering authority)
customer applying for an attorney's/legal counsel's certificate	bar association identification number	verification in an authentic public register	retrieval	- Termination of the contract (due to expiry or revocation of the certificate) + 10 years - If issuance of the certificate is refused, 10 years from the date of refusal - If the certificate application is discontinued for any reason, 10 years from the creation of the logged data	compliance with a legal obligation	data management software	YES	verification of the authenticity and validity of the document data	Hungarian Bar Association (registering authority)
customer (as the user uploading a document to the document-signing platform)	the full text of the uploaded document (all personal data contained in the document)	document analysis and preparation of a summary, categorisation, recognition of signature positions (AI-based document analysis)	analysis (artificial intelligence-based)	the same period as the document (deleted at the same time as the document is deleted)	pursuit of a legitimate interest (Article 6(1)(f) of the GDPR)	AI-based document analysis (DeepSeek language model, with the involvement of Amazon Web Services (AWS Bedrock))	YES	provision of the AI-based document analysis and summary-generation function	DeepSeek / Amazon Web Services (AWS Bedrock)
customer	website browsing data	assessing and analysing the use of the website, compiling reports on activities carried out on the website, and providing other services related to activities carried out on the website and to internet use	analysis, use	1 year	consent of the data subject		NO		

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customer	name, e-mail address, billing address, tax number, bank card data	invoicing, processing of payment	collection, transfer, use	the limitation period under the accounting rules in force at any given time	performance of a contract	Stripe, Billingo	YES	payment interface, processing of the payment process - Stripe invoicing - Billingo	Stripe LLC https://stripe.com/ Billingo Technologies Zrt. www.billingo.hu
contractual partner using the service, or its contact person	name, e-mail address, telephone number	concluding and performing contracts, and facilitating any communication between the Parties to the contractual relationship	collection / recording / use / storage	termination of the contract + 8 years	legitimate interest	shared electronic folders	NO		
natural persons applying for a position advertised by the Provider	name; e-mail address; telephone number; photograph; and any other personal data that the applicant includes in their curriculum vitae	recruitment	collection / recording / use / storage	until withdrawal of consent to the processing, or, failing that, 6 months from receipt of the application materials	consent of the data subject	shared electronic folders	NO		