

## DATA MANAGEMENT POLICY

**Boxelence Innovation Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság** (registered office: 4200 Hajdúszoboszló, Rákóczi utca 188., company registration number: Cg.09-09-036512, tax number: 32690765-2-09, statistical number: 32690765-4755-113-09, represented by: László Dános, managing director , hereinafter: Data Controller) establishes the following Data Management Policy (hereinafter: Policy) with regard to the mobile application called Boxelence (hereinafter: application):

The application you have downloaded is operated and provided by the Data Controller.

In order to use the service, you, as a user, are required to provide us with certain personal data. We treat this data confidentially, 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 (EU Regulation), and we process it solely for the purpose of providing the application service and operating the application.

Downloading and using the application, as well as providing the personal data necessary to use Boxelence Automata, is voluntary in all cases, and you are solely responsible for providing this data and for downloading and using the application.

The person providing the data is solely responsible for its accuracy. In view of this responsibility, the Data Controller shall not be held liable for any inaccuracy in the content of the data provided.

The purpose of data processing: the use of the application's services by you as a user.

The application is part of the Data Controller's management system, to which it is integrated. You receive information/notifications from the application and can manage the Boxelence Automat purchased from the Data Controller through the application, as well as initiate administrative processes related to the Boxelence Automat.

Legal basis for data processing: the user's consent pursuant to Section 5 (1) a) of Act CXII of 2011 on the right to self-determination in information and freedom of information, and Section 13/A (3) of Act CVIII of 2001 on electronic commerce services and certain issues related to information society services (Eker.tv.) Section 13/A (3).

Scope of data processed: data from the mobile devices of users who log in, which is generated during the use of the service. The data from these technical processes is recorded on the server operated by the Data Controller;

Your GPS coordinates as a user are not stored in the application, but we use them during the provision of the service to ensure the smooth operation of Boxelence Automat.  
The recordings made by the camera in Boxelence Automata are not stored in the application and are not used in the provision of the service.

By using the application in iOS and Android environments, you, as a user, consent to the Data Controller keeping anonymous statistics on the opening of certain functions of the application and the duration of their use. The User's data is displayed for the purpose of using the basic functions of the application, but we do not store this data.

Duration of data processing: We process the data for the duration of the registration and use of the application, as well as until the user's registration is deleted.

Access to data: Only our employees have access to the personal data processed, to the extent necessary for the operation of the application and the service.

The data is processed by the Data Controller; we do not grant access to third parties.

By downloading the application, you consent to the Data Controller analyzing the processed data for statistical and informational purposes in order to improve the efficiency of the system.

We do not publish the analyzed and evaluated data to third parties in any form; it is only accessible to our employees.

You may request information about the processing of your data, the manner, duration, time, and place of such processing, and any activity related to data processing at any time, and you may report any changes to your data at any time. Cancellation of registration means withdrawal of consent.

The Data Controller shall delete personal data if requested by-the User, if the purpose of data processing has ceased to exist, or if the statutory time limit for storing the data has expired, or if ordered by a court or other competent authority.

**B u d a p e s t**, May 12, 2025.

.....  
**Boxelence Innovation Kft.**  
represented by: László Dános, managing director  
**Data controller**