

UNDERGUIDE

Data Management & Information Security Policy

1. Purpose

UNDERGUIDE is committed to safeguarding confidential and personal data, ensuring compliance with international and local data protection regulations. This policy outlines our approach to responsible information management and the security measures we implement to protect data from unauthorized access, loss, or misuse.

2. Scope

This policy applies to all employees, contractors, and third parties handling data on behalf of UNDERGUIDE. It governs all types of data processing, including collection, storage, transmission, and deletion.

3. Commitments & Principles

3.1 Confidentiality

Employees must ensure that all sensitive company and client data are protected from unauthorized disclosure.

3.2 Data Collection & Processing

Data must be collected only for legitimate business purposes, and processing must comply with **Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Info Act)**.¹ Unnecessary data retention is strictly prohibited.

3.3 Access Control

Strict access controls will be implemented to ensure that only authorized personnel can handle sensitive information. Multi-factor authentication and encryption will be enforced where necessary.

¹ Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Hungary). Available at: <https://www.naih.hu/>

3.4 Compliance with Regulations

UNDERGUIDE commits to staying updated with evolving data protection laws and ensuring company-wide compliance through policies and periodic reviews. The company adheres to the requirements of the **Info Act**² and thus fully complies with the **General Data Protection Regulation (GDPR)**³ to ensure the protection of personal data and uphold privacy rights.

3.5 Incident Response

In the event of a data breach or security incident, employees must report the issue immediately.

4. Implementation & Training

4.1 Employee Training

All employees handling personal or business data must undergo cybersecurity and data protection training annually.

4.2 Data Security Measures

Secure storage, encryption, and regular backups will be enforced to safeguard sensitive information.

4.3 Compliance Audits

Regular internal and external audits will be conducted to assess data security effectiveness and compliance.

5. Quantitative Targets

5.1 Data Protection Training Goal

Achieve 100% employee training completion on data protection by 2025.

5.2 Security Audits

Conduct comprehensive annual security audits to identify and mitigate risks.

² *ibid.*

³ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (General Data Protection Regulation) [2016] OJ L119/1.

By implementing these extensive policies, UNDERGUIDE reinforces its commitment to ethical business practices, anti-corruption efforts, and data security. These policies will be reviewed periodically and updated as necessary to align with evolving regulations and industry standards.