

Privacy Notice

1. General Provisions

WeWifi Informatikai és Szolgáltató Korlátolt Felelősségű Társaság ("WeWifi", "Company", "we", "us" or "Data Controller") issues this Privacy Notice to explain how it processes personal data in connection with its websites, services, business relationships, professional communications, market research and other external-facing activities.

WeWifi is committed to processing personal data lawfully, fairly, transparently and securely, in accordance with Regulation (EU) 2016/679 ("GDPR"), Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Infotv."), and other applicable Hungarian and EU laws.

This Notice applies to personal data relating to natural persons, including website visitors, prospective and existing clients, suppliers and business partners, their representatives and employees, professional contacts, research invitees and research participants. It does not apply to data that have been irreversibly anonymised so that no natural person can reasonably be identified.

WeWifi processes only personal data that are adequate, relevant and limited to what is necessary for the stated purposes. Personal data are not sold.

2. Identity of the Data Controller

Company Name	WeWifi Informatikai és Szolgáltató Korlátolt Felelősségű Társaság
Registered Office / Mailing Address	1063 Budapest, Szinyei Merse utca 21. 1. em. 5.
Company Registration Number	Cg. 01-09-397254
Tax Number	27768808-2-42
EU Tax Number	HU27768808
Email Address	info@wewifi.hu
Phone Number	+36-20-367-9948

The Company has not appointed a data protection officer. The Data Controller is not a public authority or body, its activities do not involve operations that require regular and systematic large-scale monitoring of users, nor does it process special categories of data or

personal data relating to criminal convictions and offenses. Therefore, it is not required to designate a data protection officer.

3. How This Notice Works - Specific Processing Notices

This is WeWifi's general external Privacy Notice. For processing activities that require more detailed, project-specific information - for example a market research project, professional interview, audio recording, transcription or AI-assisted analysis - WeWifi may provide a separate specific privacy notice.

A specific notice supplements this Privacy Notice. If there is any inconsistency, the specific notice prevails for the processing activity it describes. The applicable specific notice will be provided or made available to the data subject no later than required under Articles 13 or 14 GDPR.

4. Key Definitions

Personal data	Any information relating to an identified or identifiable natural person.
Data subject	The natural person to whom personal data relate.
Processing	Any operation performed on personal data, such as collection, recording, storage, use, disclosure, analysis, restriction, erasure or destruction.
Controller	The person or organisation that determines the purposes and means of processing. For the activities described in this Notice, WeWifi is generally the controller.
Processor	A person or organisation that processes personal data on behalf of and under the instructions of the controller.
Consent	A freely given, specific, informed and unambiguous indication of the data subject's wishes by a statement or clear affirmative action.
Pseudonymisation	Processing personal data so that they cannot be attributed to a specific person without additional information kept separately.
Anonymisation	Irreversible processing that prevents a natural person from being identified by means reasonably likely to be used.

5. Website Operation and Technical Data

Data subjects	Visitors to www.wewifi.hu and www.wewifi.eu .
Data processed	IP address and other network identifiers, date and time, requested URL/page, referrer where available, browser/device and operating-system information, server response and security-related technical data.
Purpose	Operation, availability, troubleshooting, abuse prevention, cyber-security, incident investigation and protection of the websites and IT systems.
Legal basis	WeWifi's legitimate interests in operating and securing its websites and IT systems (GDPR Article 6(1)(f)).
Source	Automatically generated when the website is accessed.
Retention	For the period reasonably necessary for operation and security, according to hosting and security settings; longer only where necessary to investigate an incident, enforce a claim or comply with law.
Recipients	Authorised WeWifi personnel and contracted hosting / IT / security service providers.

6. Contact Forms, Enquiries and Business Communications

6.1 Contact form and incoming enquiries

Data subjects	Persons contacting WeWifi through the website, email, telephone, LinkedIn or other business channels.
Data processed	Name, employer, job title where relevant, email address, phone number where provided, message content, attachments, communication history, and technical metadata such as timestamp and IP address where generated by the website.
Purpose	Responding to enquiries, identifying the sender, maintaining communication, preparing quotations or proposals and taking requested pre-contractual steps.
Legal basis	GDPR Article 6(1)(b) where processing is necessary to take steps at the data subject's request before entering a contract; otherwise WeWifi's legitimate interest in handling business enquiries and communications (Article 6(1)(f)).
Source	The data subject or the organisation represented by the data subject.
Retention	Normally until the enquiry is resolved and for up to 24 months thereafter where reasonably necessary for follow-up, continuity and the establishment, exercise or defence of legal claims. If a contractual relationship is formed, the applicable contract and accounting retention rules apply.
Recipients	Authorised WeWifi personnel and contracted IT, hosting, email and communications service providers.

6.2 Client, supplier and business-partner contacts

Data subjects	Natural-person clients and the representatives, employees and contact persons of clients, suppliers, subcontractors and other business partners.
Data processed	Name, job title, employer, professional contact details, correspondence, meeting notes, project and service-related information, access/contact information necessary for service delivery, and where applicable invoicing or contract data.
Purpose	Contract administration, project delivery, technical support, coordination, invoicing, supplier management, service quality and protection of legal rights.
Legal basis	Performance of a contract or pre-contractual steps where the data subject is a party (Article 6(1)(b)); WeWifi's legitimate interest in managing B2B relationships where the data subject acts for an organisation (Article 6(1)(f)); and compliance with legal obligations where applicable (Article 6(1)(c)).
Source	The data subject, the represented organisation, project participants and business communications.
Retention	For the duration of the business relationship and thereafter for the applicable limitation period where necessary for legal claims. Accounting and tax records are retained for the period required by applicable law.
Recipients	Authorised WeWifi personnel, relevant subcontractors where necessary for service delivery, accountants and professional advisers, and contracted IT / communications providers.

7. B2B Professional Outreach and Networking

WeWifi may identify and contact professionals whose role is reasonably relevant to WeWifi's services, professional activities, partnerships or research. The aim is to conduct proportionate B2B communication, not to create profiles about individuals' private lives.

Data subjects	Business professionals and representatives of organisations.
Data processed	Name, employer, job title/function, publicly available professional profile, business contact details, source of the data, relevant professional context and communication history.
Purpose	Professional networking, identifying relevant business contacts, presenting or discussing potentially relevant B2B services, partnerships or technical topics.
Legal basis	WeWifi's legitimate interests in proportionate B2B business development, networking and professional communication (GDPR Article 6(1)(f)), subject to the data subject's reasonable expectations and right to object. Where a communication constitutes direct marketing, WeWifi also complies with the specific rules applicable to electronic and direct marketing communications and obtains prior consent where required by applicable law.
Sources	Public professional sources such as company websites, LinkedIn / LinkedIn Sales Navigator, professional directories, conference or event information, referrals and other publicly available business sources.
Retention	Until the contact is no longer relevant, the data subject objects, or normally no longer than 24 months after the last relevant interaction. Minimal suppression information may be retained where necessary to ensure that an objection or opt-out is respected.
Recipients	Authorised WeWifi personnel and contracted CRM, email, communications or professional-networking service providers.

Where personal data are obtained from public or third-party professional sources rather than directly from the data subject, WeWifi provides the information required by Article 14 GDPR within the applicable period and, where communication takes place earlier, at the latest at the time of the first communication.

8. Market Research and Professional Interviews

WeWifi may conduct limited B2B market research and professional interviews in fields related to its activities and professional expertise. Research participation is voluntary. Research outputs are published in aggregated or anonymised form by default.

8.1 Identifying and inviting research participants

Data processed	Name, employer, job title/function, public professional profile, business contact details, source of the data and invitation / scheduling history.
Purpose	Identifying relevant participants, sending a research invitation and arranging the interview.
Legal basis	WeWifi's legitimate interest in conducting a proportionate, targeted B2B research project (GDPR Article 6(1)(f)).
Sources	LinkedIn / Sales Navigator, company websites and other public professional sources.
Retention	Until objection, or normally no later than 90 days after the research project is closed, unless a separate business relationship or another legal basis applies.

8.2 Interview answers and research notes

Data processed	Professional answers, opinions, research notes, research code / identifier, and business or market information voluntarily provided during the interview.
Purpose	Understanding the market, analysing trends and preparing research findings and an aggregated professional report.
Legal basis	The participant's voluntary consent (GDPR Article 6(1)(a)), as described in the applicable specific research notice.
Retention	As stated in the applicable research notice. For the Hungarian Flex Office Market Research, the working research material is retained until 90 days after the final report is completed, but no longer than 9 months after the interview, after which it is erased or irreversibly anonymised unless another legal basis applies.

8.3 Audio recording and transcription

Where an interview is audio-recorded, the recording is used to capture the participant's answers accurately and to reduce errors caused by mishearing, incomplete note-taking or incorrect interpretation. A recording is made only after prior consent. If consent to recording is not given, the interview may be conducted using notes instead.

Data processed	Voice, audio recording, meeting metadata and transcript.
Purpose	Accurate recording of answers, preparation and verification of a transcript, and reliable research analysis.
Legal basis	Separate consent (GDPR Article 6(1)(a)); where Hungarian personality-right rules require consent for the making and use of a voice recording, such consent is also obtained.
Retention	The audio recording is deleted after the transcript has been checked, and in any event normally within 30 days. The transcript is retained for the period specified for research material in the applicable specific notice.
Recipients	Only authorised WeWifi personnel and, where used, contracted meeting / recording and transcription providers identified by category or name in the applicable specific notice.

8.4 AI-assisted analysis of research text

WeWifi may use an AI-assisted tool to support tasks such as thematic coding, summarisation, comparison of responses and identification of recurring patterns. AI is used as an analytical aid; a human reviews and finalises the research conclusions.

Data processed	Preferably pseudonymised transcript or extract, research code and the minimum context necessary for the analysis.
Purpose	Supporting structured qualitative analysis while reducing manual transcription and coding errors.
Legal basis	The participant's separate consent to AI-assisted analysis (GDPR Article 6(1)(a)), as described in the applicable specific research notice.

Safeguards	Direct identifiers and unnecessary third-party personal data are removed where reasonably possible before submission. WeWifi selects providers and settings intended to prevent use of submitted research material for unrelated purposes or model training, unless explicitly and separately agreed. No solely automated decision producing legal or similarly significant effects is made about a participant.
Retention	At WeWifi: the same period as the research transcript. At the service provider: the minimum retention technically and contractually available and described in the applicable specific notice / provider terms.

8.5 Publication and quotations

Research findings are normally published only in aggregated, anonymised or sufficiently generalised form. WeWifi does not attribute an individual statement to a named person or company unless separate permission has been obtained for that specific quotation or identifiable case example. Where a quotation is approved, the participant is informed of the intended wording and context before publication.

9. Cookies, Analytics and Similar Technologies

The WeWifi websites may use cookies and similar technologies. Strictly necessary technologies may be used to provide functions requested by the visitor and to maintain security and website operation. Non-essential analytics or other optional technologies are activated only where the required consent has been obtained.

Strictly necessary cookies / technologies	Purpose: basic website operation, security, session management and storing privacy preferences. Legal basis: the applicable legal basis for providing the requested website functionality and/or WeWifi's legitimate interests, together with the rules applicable to storing or accessing information on the user's device.
Analytics cookies / technologies (where enabled)	Purpose: measuring website use and improving content and performance. Legal basis: consent (GDPR Article 6(1)(a)) where required. These technologies remain disabled until consent where consent is required.
Cookie information	The exact cookies / technologies in use, provider, purpose and duration should be shown in the website cookie banner or cookie settings and kept consistent with the actual website configuration.

Visitors can change or withdraw non-essential cookie choices through the website cookie settings where available and can also manage cookies through their browser. Disabling strictly necessary technologies may prevent parts of the website from functioning correctly.

10. Data Processors, Recipients and Service Providers

WeWifi may use carefully selected service providers acting as processors. Processors may process personal data only on documented instructions from WeWifi and under a contract meeting the requirements of Article 28 GDPR. Depending on the activity, recipient categories may include hosting providers, IT support and cyber-security providers, email and communications platforms, CRM or professional-networking platforms, accountants, professional advisers, meeting / recording platforms, transcription services, cloud storage and AI-assisted analysis providers.

The website hosting provider identified in the current service setup is:

Provider	Incsb, LLC
Registered office	120 19th St N Ste 201 PMB, 88100, Birmingham, AL, US
Service	Website hosting and server services.
Privacy information	https://incsub.com/privacy-policy/

For project-specific processing such as recorded research interviews, the applicable specific privacy notice identifies or describes the relevant meeting, recording, transcription, storage and AI service providers and any material international-transfer arrangements. WeWifi may update service providers from time to time; the information provided to data subjects will reflect the providers or provider categories relevant to the processing at that time.

Personal data may also be disclosed where required by law, a binding authority decision or a court order, or where disclosure is necessary for the establishment, exercise or defence of legal claims.

11. Transfers Outside the European Economic Area

Where a service provider processes personal data outside the European Economic Area (EEA), WeWifi ensures that the transfer is based on a mechanism recognised by Chapter V GDPR, such as an adequacy decision, Standard Contractual Clauses or another applicable safeguard. Where necessary, WeWifi also assesses supplementary technical and organisational measures.

Information about a material international transfer relevant to a specific research or other project is provided in the applicable specific notice or on request.

12. Data Security

WeWifi applies technical and organisational measures appropriate to the risk, including access control, role-based authorisation, secure authentication, encryption where appropriate, secure storage, back-up and recovery procedures, confidentiality obligations, processor due diligence and incident-management procedures. Access to personal data is limited to persons who need it for an authorised purpose.

No method of transmission or storage can be guaranteed to be absolutely secure. WeWifi nevertheless takes reasonable measures to prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data.

13. Retention Principles

WeWifi does not retain personal data for longer than necessary for the purpose for which they were collected, unless a longer period is required or permitted by law. When determining a retention period, WeWifi considers the purpose of processing, the nature and sensitivity of the data, legal and contractual requirements, limitation periods, security needs, and whether the data can instead be anonymised.

Where a more specific retention period is stated in this Notice or in an activity-specific notice, that period applies. After expiry, personal data are erased, securely destroyed or irreversibly anonymised unless a new lawful basis requires further retention.

14. Rights of Data Subjects

Subject to the conditions and limitations of the GDPR, data subjects may exercise the following rights:

- Right of access: to obtain confirmation whether WeWifi processes personal data concerning them and to receive the information and a copy required by Article 15 GDPR.
- Right to rectification: to request correction of inaccurate personal data and completion of incomplete data.
- Right to erasure: to request deletion where the conditions of Article 17 GDPR are met.
- Right to restriction: to request restriction of processing in the cases listed in Article 18 GDPR.
- Right to data portability: where processing is based on consent or contract and carried out by automated means, to receive data provided by the data subject in a structured, commonly used and machine-readable format and, where technically feasible, transmit them to another controller.
- Right to object: to object at any time, on grounds relating to the data subject's particular situation, to processing based on legitimate interests. WeWifi will stop the processing unless it demonstrates compelling legitimate grounds overriding the interests, rights and freedoms of the data subject, or the processing is necessary for legal claims.

- Right to object to direct marketing: where personal data are processed for direct marketing, the data subject may object at any time; after an objection, WeWifi will no longer process the data for that purpose.
- Right to withdraw consent: where processing is based on consent, consent may be withdrawn at any time without affecting the lawfulness of processing carried out before withdrawal.
- Rights concerning automated decision-making: WeWifi does not use the activities described in this Notice to make solely automated decisions that produce legal effects or similarly significantly affect a person, unless separately disclosed and lawfully implemented.

Requests may be sent to info@wewifi.hu or to WeWifi's mailing address. WeWifi may ask for information reasonably necessary to verify the identity of the requester. WeWifi normally responds without undue delay and within one month, subject to the extensions permitted by Article 12 GDPR for complex or numerous requests.

15. Complaints and Judicial Remedies

If a data subject considers that the processing of personal data infringes the GDPR, they may contact WeWifi first at info@wewifi.hu and may also lodge a complaint with a competent supervisory authority. In Hungary, the supervisory authority is:

Authority	Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság - NAIH)
Address	1055 Budapest, Falk Miksa utca 9-11., Hungary
Mailing address	1363 Budapest, Pf. 9., Hungary
Email	ugyfelszolgalat@naih.hu
Website	https://www.naih.hu/
Telephone	+36 (1) 391-1400

Data subjects also have the right to seek a judicial remedy before a competent court in accordance with the GDPR and applicable national law.

16. Changes to This Privacy Notice

WeWifi may amend this Privacy Notice where its processing activities, service providers, technologies or legal requirements change. The current version is published on the WeWifi website. Where a change materially affects an ongoing processing activity and the GDPR requires additional notice or renewed consent, WeWifi will provide that information in an appropriate manner before the change takes effect for the relevant processing.