

We are pleased that you are visiting our website at www.adkex.io and our Software as a Service ("SaaS") Solution.

Data protection and data security when using our website and SaaS are very important to us. We would therefore like to inform you which of your personal data we collect when you visit our website and use our SaaS, and for what purposes it is used.

WHO IS RESPONSIBLE?

The person responsible in the sense of Hungary's Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (the "Data Protection Act") and the EU's General Data Protection Regulation ("GDPR") is AdKex.io Ltd, 1163 Budapest, Jászhalom utca 11., Hungary ("AdKex.io", "we", "us", "our").

If you have any questions about this policy or our data protection practices, please contact us using hello@adkex.io.

PRINCIPLES OF DATA PROCESSING

Personal data

Personal data is any information relating to an identified or identifiable natural person. This includes, for example, information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behavior.

Processing

The processing of personal data (e.g. collection, retrieval, use, storage or transmission) always requires a legal basis.

Legal basis

In accordance with Hungary's Data Protection Act and the GDPR, we have to have at least one of the following legal bases to process your Personal Data: i) you have given your consent, ii) the data is necessary for the fulfillment of a contract / pre-contractual measures, iii) the data is necessary for the fulfillment of a legal obligation, or iv) the data is necessary to protect our legitimate interests, provided that your interests are not overridden.

Retention

Processed personal data will be deleted as soon as the purpose of the processing has been achieved and there are no longer any legally required retention obligations.

DATA WE COLLECT

Provision and use of the website

When you call up and use our website, we collect the personal data that your browser automatically transmits to our server. This is technically necessary for us to display our website and to ensure its stability and security. In this sense, we collect the following data: i) IP address of the requesting computer, ii) Date and time of access, iii) name and URL of the file accessed, iv) website from which the access was made (referrer URL), v) browser used and, if applicable, the operating system of your computer as well as the name of your access provider. The legal basis is our legitimate interest.

Hosting



We use Firebase (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, Google Privacy Policy) for hosting our website. All data collected is processed on their servers. The legal basis for processing is our legitimate interest.

Data management and customer support

For optimal customer support, we use first name, last name, email address, and the data related to your contract with us. Your data may be stored on our website and/or our customer relationship management system ("CRM system") provided by Freshsales (Freshworks Inc., 2950 S. Delaware Street, Suite 201, San Mateo, CA 94403, USA, <u>Freshworks Privacy Notice</u>). This data processing is based on our legitimate interest in providing our customer service.

Google reCAPTCHA

We use Google reCAPTCHA on our website to ensure data security and to prevent automated access. This service helps us determine whether data input on our website (e.g., in contact forms or newsletter sign-ups) is made by a human or by an automated program. reCAPTCHA analyzes various characteristics of the visitor. This analysis begins automatically as soon as the website visitor enters a part of the website with reCAPTCHA enabled. For the analysis, reCAPTCHA evaluates various information (e.g., IP address, time spent by the visitor on the website, or mouse movements made by the user). The data collected during the analysis is forwarded to Google. The legal basis for this processing is our legitimate interest in protecting our website from abusive automated crawling and spam.

Cookies

We use cookies on our website to ensure functionality and enhance your experience. These small files, stored on your device, can be either Essential (necessary for the site to work) or Non-essential (used for analytics or advertising). We require your consent for Non-essential Cookies, as per relevant Hungarian and EU regulations, we need to obtain consent for the use of Non-essential Cookies. For further information on the cookies we use, please refer to our Cookie Policy. The legal basis for processing is our legitimate interest and your consent.

Cookie consent

Our website uses a cookie consent tool to obtain and document your consent for cookie storage. When you visit, we collect your consent status, IP address, browser and device information, and time of visit. This processing is based on our legitimate interest.

Economic analyses and market research

For business and market research, we analyze internal data (transactions, contracts, browse behavior) to improve our services. These analyses are for our internal use only, are anonymized, and are not disclosed externally. We use Google Analytics for this purpose, based on our legitimate interest and your consent. More details can be found in our Cookie Policy. We also use Plerdy (Plerdy Privacy Policy) for analyzing user behavior on our website to optimize user experience, and Albacross (Albacross Nordic AB, Vasagatan 16, 111 20 Stockholm, Sweden, Albacross Privacy Policy) for account-based marketing to identify potential business clients. The legal basis for these activities is our legitimate interest and your consent, where applicable.

Newsletter Signup

When you sign up for our newsletter, we collect your email address. This data is used solely for the purpose of sending you our newsletter, which may include information about our services, promotions, and relevant news. We use Mailchimp (Intuit Inc., 2700 Coast Ave, Mountain View, CA



94043, USA, <u>Mailchimp Privacy Policy</u>) for our email marketing services. You can unsubscribe from the newsletter at any time by following the instructions provided in each email. The legal basis for this processing is your consent.

Contacting Us

We offer you the opportunity to contact us using various methods. We collect the data you submit such as your name, email address, telephone number and your message in order to process your enquiry and respond to you. The legal basis is both your consent and contract.

Contractual Services

We process the Personal Data involved when you enter into a contract with us in order to be able to provide our contractual services. This includes in particular our support, correspondence with you, invoicing, fulfillment of our contractual, accounting and tax obligations. Accordingly, the data is processed on the basis of fulfilling our contractual obligations and our legal obligations.

Our SaaS and Service Data

When you use our SaaS, we process the Personal Data involved in your use of our services ("Service Data") to provide our services, acknowledging your full ownership and control, including access, sharing via integrations, export, and deletion. As your Data Processor, we handle this data strictly according to your instructions. Employee access is restricted to a need-to-know basis. All Service Data is stored on Firebase and Supabase (Supabase Inc., 2443 Fillmore St #380-4014, San Francisco, CA 94115, USA, Supabase Privacy Policy) servers in Europe, secured with appropriate legal and technical measures. We do not store user information on our own infrastructure. We only collect data on behalf of our clients, and when they give consent. With their consent we can make deeper analyses into their data.

Our SaaS functions include:

- *List Building:* We process data to identify advertisers, access contact information (names, emails, phone numbers, social media profiles), and enable downloading of contact lists as CSV files.
- Sales Presentation: We process data to assess competitor ads and help create ad strategies.
- *Onboarding:* We process data to reveal market and competitor insights and showcase tailored opportunities.
- *Retention:* We process data to upgrade monthly reporting and highlight changes in your client's market and competitor strategies, including refining destination URLs.
- Search: We process data from keywords to obtain localized ad data, and to customize targeting for locations and devices, and schedule new searches.
- *Analyze:* We process data to analyze ads, market trends, and competitor insights, including reviewing and searching through ads, tracking changes, and analyzing ad destination URLs.
- *Build:* We process data to find advertiser contact details, including names, emails, phone numbers, and social media accounts, and enable downloading of contact lists. We plan to incorporate manual checks by our team for accuracy of verified contact information.

The legal basis for this processing is our contractual service.

Google User Data

AdKex.io uses Google APIs to access and process your data within our services, including our SaaS, only with your explicit consent. This access is limited to necessary scopes like Google Analytics and Google Ads. We only use this data to provide and improve features visible in our user interface. This



includes generating analytics reports, offering recommendations based on Google Analytics, and syncing campaign performance from Google Ads. We do not use your Google user data for personalized advertising, advertising outside our services, or building user profiles for resale. All Google user data is stored securely on Google Workspace servers in Europe and is encrypted both in transit and at rest. Access is strictly limited to authorized personnel on a need-to-know basis. No human has access unless you give explicit permission, it's for security, or legally required. We do not sell Google user data. Data may only be shared with subprocessors who assist us and are bound by data protection agreements, or if legally required or with your explicit consent for a specific case. We retain Google user data only as long as necessary for the outlined purposes. You can request access, export, or deletion at any time by contacting hello@adkex.io. Data unrelated to your direct use of our services is not retained and is securely deleted when no longer needed. Our use of Google user data strictly adheres to Google's API Services User Data Policy, including its Limited Use requirements. We regularly review our practices to ensure full compliance.

Support ticket

When you create a support ticket, we request personal and non-personal data (like your name, email, and order details) to process and handle your inquiry. This data is not shared with third parties. Our employees may access data you share for technical support or import purposes, with strict privacy and security guidelines in place. The legal basis for this processing is our contractual obligation and/or our legitimate interest.

Administration, financial accounting, office organization, contact management

We process data in the context of administrative tasks as well as organization of our business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

Payment Data

If you make a purchase your payment will be processed via our payment service provider Stripe (Stripe, Inc., 354 Oyster Point Blvd, South San Francisco, CA 94080, USA, <u>Stripe Privacy Policy</u>). Payment data will solely be processed through Stripe, and we have no access to any Payment Data you may submit. The legal basis for the provision of a payment system is the establishment and implementation of the contract.

Promotional use of your data

We use your data within the legally permissible scope for marketing purposes, e.g., to draw your attention to special promotions and discount offers. In addition, we may draw your attention to comparable offers by email, e.g., we may inform you about exclusive sales, promotions, or special events. The legal basis for processing is our legitimate interest.

DATA SECURITY

We protect your Personal Data and Service Data confidentially using extensive, regularly updated technical and organizational security measures, including encryption (SSL/TLS). However, due to internet structure, we cannot guarantee against actions outside our control; users are responsible for protecting their own data.

MARKETING

We may contact you for marketing and advertising purposes, via consented communication channels, based on your explicit or implied consent (from interactions or contractual relationships). Marketing is



typically by email, but may use other channels, managed by us or service providers. All direct marketing includes an opt-out option.

SOCIAL MEDIA

We maintain a social media presence based on our legitimate interest. If you interact with us on these platforms, we and the social media platform are jointly responsible for processing your data (e.g., messages, comments, publicly viewable profile details). This data is used to handle your requests and for market research and advertising (e.g., creating usage profiles for tailored ads). The legal basis for this processing is typically our legitimate interest and your consent, with further details on advertising in our Cookie Policy. Your public profile data processed depends on your own social media privacy settings.

INTERNATIONAL TRANSFERS

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organizational measures to protect the Personal Data we transfer.

SHARING YOUR PERSONAL DATA

We may share your Personal Data with Business Partners to provide or customize services, but only with those who agree to protect and use the data solely for our specified purposes. We may also disclose data with your consent, for legal or fraud prevention purposes, or to protect our legitimate business interests. Otherwise, your Personal Data will not be disclosed without prior notice.

WHAT WE DO NOT DO

- We do not request Personal Data from minors and children;
- We do not use Automated decision-making including profiling; and
- We do not sell your Personal Data.

PRIVACY RIGHTS

Under Hungary's Data Protection Act and the GDPR, you can exercise the following rights:

- Right to information
- Right to rectification
- Right to deletion
- Right to data portability
- Right of objection
- Right to withdraw consent
- Right to complain to a supervisory authority
- Right not to be subject to a decision based solely on automated processing.

If you have any questions about the nature of the Personal Data we hold about you, or if you wish to exercise any of your rights, please contact us.

UPDATING YOUR INFORMATION AND WITHDRAWING YOUR CONSENT

We will assist you if you believe your information is inaccurate or if you wish to rectify, delete, object to its processing, or withdraw consent. Please contact us for such requests.

ACCESS REQUEST



If you wish to make a Data Subject Access Request, please inform us in writing. We will respond to requests for access and correction as soon as reasonably possible. If we cannot respond within thirty (30) days, we will inform you of the delay and the reason. If we are unable to provide data or make a requested correction, we will explain why.

COMPLAINT TO A SUPERVISORY AUTHORITY

You have the right to complain about our data processing to a supervisory authority. In Hungary, this is the Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information, www.naih.hu). We would appreciate the chance to address your concerns first.

HELP AND COMPLAINTS

If you have any questions about this policy or the information we hold about you, please contact us at hello@adkex.io and we will do our best to address your concerns.

CHANGES

This policy is effective as of 09/07/2025. Any prior versions are invalid, and if we make changes to this policy, we will revise the effective date.