

MIRR•TR•N

THE WORLD OF NEUTRON

GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

MIRROTRON LTD.

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1. INTRODUCTION

Mirrotron Ltd. processes personal data relating to clients, employees, contractors, and suppliers in the course of its business activities.

We are committed to handling personal data responsibly and in compliance with applicable data protection legislation, including the Regulation (EU) 2016/679 of the European Parliament and of the Council (EU GDPR) as well as the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

Mirrotron Ltd. ensures full compliance with both the EU & UK General Data Protection Regulation and is committed to protecting the rights of data subjects by ensuring the following:

- The confidentiality, integrity, availability, and resilience of processing systems, and services;
- Compliance with the rights of data subjects to receive privacy information, and to exercise rights of access, rectification, deletion, and portability of personal data;
- That any consent-based processing meets the standards of active, informed consent, and that such consents are recorded and auditable;
- That legal safeguards are in place to legitimise transfers of personal data outside the UK (where applicable);
- The maintenance of records of personal data processing activities; and
- The regular testing, assessment, and evaluation of the effectiveness of the above measures.

We are accountable for our processing and must be able to demonstrate compliance with these principles.

This policy outlines how Mirrotron Ltd. ensures the lawful, fair, and transparent processing of personal data.

2. SCOPE

This policy applies to all employees, and contractors of Mirrotron Ltd. who process personal data as part of their work. It covers all systems, projects, and activities involving personal data, whether the data relates to clients or business contacts. This policy does not apply to external organisations or third-party partners acting as independent data controllers; however, where they act as data processors on our behalf, appropriate contractual agreements will be in place.

3. KEY TERMS

- Data Subject: The individual whose personal data is being processed.
- Personal Data: Information that identifies or could identify a living individual, directly or indirectly (e.g. name, contact details, identification number, online identifier).
- Special Category Personal Data: Sensitive personal information requiring additional protection — including data concerning race, ethnicity, religion, health, biometric data, sexual orientation, or political opinions.
- Processing: Any operation performed on personal data, including collection, storage, analysis, sharing, or deletion.
- Controller: Mirrotron Ltd., which determines the purposes and means of processing personal data.
- Processor: A third party engaged by Mirrotron Ltd. to process data on its behalf, under written contract.

4. DATA PROTECTION PRINCIPLES

1. LAWFUL, FAIR AND TRANSPARENT

Personal data is processed only where there is a lawful basis, and individuals are informed how their data is used.

2. PURPOSE LIMITATION

Personal data is collected only for specified, explicit, and legitimate purposes.

3. DATA MINIMISATION

The collection of personal data is limited to what is necessary for those purposes.

4. ACCURACY

All personal data is kept accurate and up to date.

5. STORAGE LIMITATION

Collected personal data is retained only as long as necessary.

6. INTEGRITY AND CONFIDENTIALITY

Personal data is processed securely to protect against unauthorised or unlawful processing, loss, or damage.

5. INDIVIDUAL RIGHTS

We respect the rights of all individuals regarding their personal data and will respond promptly to any valid request under the EU GDPR and the UK GDPR. These rights include:

1. THE RIGHT TO BE INFORMED

Data Subjects may ask us to show them the personal information we manage.

2. THE RIGHT TO RECTIFICATION

Data Subjects may request the modification of any personal data we use if they believe it is inaccurate.

3. THE RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)

Data Subjects may request the deletion of personal data we use.

4. THE RIGHT TO RESTRICT PROCESSING

Data subject may request that their data be only stored and not otherwise processed.

5. THE RIGHT TO DATA PORTABILITY

Data subjects may ask to receive their personal data and transmit it to another controller in a commonly used format.

6. THE RIGHT TO OBJECT

Data Subjects may refuse the processing of their personal data and may lodge a complaint about how their personal information is managed.

Requests can be made by emailing Mirrotron Ltd.: neutron@mirrotron.com

6. RESPONSIBILITIES

1. ALL STAFF AND CONTRACTORS

All employees, researchers, and contractors must:

- Handle personal data securely and only for authorised purposes.
- Ensure data accuracy and report any inaccuracies or breaches immediately.
- Follow this policy and any supporting procedures (e.g. retention schedules, IT security).

2. MANAGEMENT

Managers must ensure their teams understand and comply with this policy, maintain records of processing activities (ROPA), and ensure that personal data within their projects is handled lawfully and proportionately.

7. SECURITY AND DATA RETENTION

We use appropriate technical and organisational measures to safeguard personal data, including encryption, access control, secure backups, and staff training.

Mirrotron Ltd. stores the personal data of the Data Subjects electronically on its own server with restricted access, and paper-based documents are stored physically in locked facilities.

The IT systems are equipped with appropriate protection (such as antivirus software and firewalls).

In addition, as a general principle, the Mirrotron Ltd. ensures the security of data processing by applying technical, organisational, and administrative measures appropriate to the current state of technology, providing a level of protection proportionate to the risks associated with data processing.

Personal data will only be kept for as long as is necessary for the purpose it was collected.

8. DATA BREACHES

Mirrotron Ltd. keeps records of any data protection incidents, including the facts related to the incident, its effects, and the corrective measures taken. The Management reports any data protection incident to the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) without undue delay (where feasible, no later than 72 hours after becoming aware of the incident) — except where the incident is unlikely to pose a risk to the rights and freedoms of natural persons.

9. THIRD-PARTY PROCESSORS

Where Mirrotron Ltd. uses third-party service providers (e.g. cloud platforms, research partners, consultants), we will ensure:

- Appropriate due diligence is carried out before engagement.
- Data processing agreements are in place.
- Processors meet equivalent data protection standards.

10. FURTHER INFORMATION AND COMPLAINTS

In case of questions, concerns, or wish to exercise your rights, please contact:

neutron@mirrotron.com

11. FINAL PROVISIONS

This General Data Protection Regulation Policy is publicly available at our website at mirrotron.com and continuously communicated, internally and externally.

Mirrotron's COOs are responsible for reviewing the GDPR Policy on an annual basis and may amend or supplement the policy as necessary.

The policy is valid from October 22, 2022. and remains in effect until withdrawal.