

Privacy Notice

on the processing of personal data in connection with contract management concerning the natural-person contact persons, representatives and signatories of contracting partners and contracting parties who are natural persons, and with the review of contracts using artificial intelligence

The **CLT-UFA S.A. HBD** (registered office: L-1543 Luxembourg, 43 Boulevard Pierre Frieden; hereinafter: the Controller) uses a contract management system to prepare and review its own contracts and supports this activity through the use of artificial intelligence. The processing involving the use of artificial intelligence relates exclusively to contracts concluded with contracting parties that are not natural persons and therefore does not extend to the review of contracts with contracting parties who are natural persons, employment contracts, or contracts concerning minors or vulnerable data subjects.

This Notice provides the information required under Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR).

I. Contact details of the Controller:

CLT-UFA S.A. HBD

L-1543 Luxembourg, 43 Boulevard Pierre Frieden

E-mail address of the data protection officer: adatvedelem@rtl.hu

II. Purposes of processing:

1. The purpose of processing in connection with contract management is the electronic recording and tracking of the preparation, review, approval and signature of contracts; the electronic registration, management and storage of contractual documentation; and ensuring the performance of contractual obligations, legal compliance, evidentiary support and operational efficiency.
2. The purpose of processing in connection with the review of contracts using artificial intelligence is to support the Controller's contract-preparation, contract-review and contract-administration tasks relating to its own contracts. Based on a submitted contract or contract excerpt, the system may produce a summary, comparison, structured data, risk alert, draft text or clause, list of questions or checklist, and may identify omissions and discrepancies. It is not intended to formulate a final legal opinion, make a decision producing legal effects, or replace review by a legal professional.

III. Legal basis for processing:

For natural-person contact persons, representatives and signatories of contracting partners, the legal basis for processing is the legitimate interest pursued pursuant to Article 6(1)(f) GDPR. The Controller's legitimate interest is the efficient, secure and readily retrievable management of contracts and the proper management of contractual relationships. For contracting parties who are natural persons, the legal basis is processing necessary for entering into and performing a contract pursuant to Article 6(1)(b) GDPR and, where necessary to comply with applicable accounting, tax or other statutory obligations, Article 6(1)(c) GDPR.

The legal basis for processing in connection with contract review using artificial intelligence is the legitimate interest pursued pursuant to Article 6(1)(f) GDPR. The Controller's legitimate interest is the efficient and consistent legal analysis of its own contracts using artificial intelligence and the timely identification of contractual risks.

The data subject may object at any time, on grounds relating to their particular situation, to processing based on legitimate interests by sending an e-mail to adatvedelem@rtl.hu.

IV. Categories of personal data processed:

During contract management, in relation to natural-person contact persons, representatives and signatories of contracting partners, the Controller may process their name, job title, organisational role, the name of the partner they represent, e-mail address, telephone number, the fact and time of signature, the signature in the case of a handwritten signature, and the fact and time of actions taken in the contracting process, such as review or approval. In the case of contracting parties who are natural persons, the Controller may process their name, home address, contact details,

other personal data necessary to enter into and perform the contract, data concerning actions taken during the contracting process, and the fact and time of signature and, in the case of a handwritten signature, the signature. During contract review using artificial intelligence, only personal data appearing in a contract, annex, offer, negotiation material or related correspondence connected with the Controller's contracting parties that are not natural persons may be processed, including in particular: name; job title, organisational role and employer; signature; postal and electronic contact details; registration, tax, bank-account, payment or remuneration data; contractual rights, obligations, performance and liability data; information relating to intellectual property, personality rights or rights of use; professional experience and qualifications; data concerning a complaint, claim, dispute or breach of contract; inferences concerning the data subject that may be drawn from free text; and any analysis or suggested text generated from such data that contains personal data. The data are obtained from the data subject, the contracting partner, the Controller's contract owner, legal function or another lawful source, or are generated during the contracting or analysis process. The use of artificial intelligence does not extend to the Controller's employees, contracting partners acting as natural persons, minors or vulnerable data subjects, and does not involve the processing of special categories of personal data, data relating to criminal convictions and offences, or high-risk identifiers.

V. Method of processing:

During contract management, contractual documentation and related personal data are recorded, stored, tracked and organised in an electronic contract management system.

The artificial intelligence tool used to review contracts is the Legal Contract Analyzer custom GPT (hereinafter: the custom GPT), operating within the ChatGPT Enterprise system operated by OpenAI Ireland Ltd. A legal professional compares the system output with the source text and applicable law, corrects it where necessary, and only the version approved by a human is used.

No contract or file containing personal data is uploaded to the custom GPT's persistent Knowledge repository. Personal data are not transferred to any external application or through any browsing or web function, and the conversation is not shared publicly. OpenAI does not use content entered into the custom GPT to train its models. The custom GPT does not carry out profiling and does not make a decision within the meaning of Article 22 GDPR that is based solely on automated processing and produces legal effects concerning the data subject or similarly significantly affects them.

VI. Duration of processing:

Within the contract management system, personal data are processed together with the documentation relating to the relevant contract, as a rule, until the end of the general five-year limitation period following termination of the contract; where an accounting retention obligation applies, for eight years following the year in which the contract terminated or expired; and, in the event of legal proceedings, until those proceedings have been finally and conclusively concluded. Upon expiry of the retention period, documentation and personal data that are no longer necessary for further processing are deleted.

The retention period in the custom GPT for the original contract and the analysis approved by a human is determined by the rules applicable to the underlying contract-related processing. The prompt, conversation, uploaded file and output processed in the custom GPT are retained until expiry of the general limitation period for claims arising from the related contract. The service provider deletes conversations deleted by the Controller from its systems within thirty days of deletion.

VII. Recipients and persons authorised to access the data:

Personal data may be accessed by those employees of the Controller whose responsibilities include the preparation, review, approval, signature, performance, record-keeping or oversight of the relevant contract. Where required to comply with a legal obligation or for the establishment, exercise or defence of legal claims, the competent authority or court may also be a recipient. No data are transferred from the contract management system to any other external party.

A conversation conducted in the custom GPT may be accessed by the authorised user who initiated it and, to the extent necessary to perform or supervise the task, by authorised employees of the Controller. The builder of the custom GPT and other workspace users do not automatically have access to individual conversations. OpenAI Ireland Ltd. and its approved sub-processors may also be recipients in their capacity as processors.

VIII. Processors:

To operate the contract management system and perform contract-review tasks, the Controller engages M-RTL Zrt. (1068 Budapest, Dózsa György út 84/A.) as a processor. The custom GPT operates within OpenAI Ireland Ltd.'s ChatGPT Enterprise service; accordingly, OpenAI Ireland Ltd. acts as a processor. Processing carried out with the involvement of OpenAI and its sub-processors is not necessarily limited to the territory of the European Union or the European Economic Area. For transfers outside the EU/EEA, OpenAI applies appropriate transfer mechanisms in accordance with Chapter V GDPR, including the European Commission's standard contractual clauses and, where necessary, supplementary safeguards and a transfer impact assessment. The current list of sub-processors is available here: <https://openai.com/hu-HU/policies/sub-processor-list/>

In the course of the processing activities it performs, the processor acts in accordance with the Controller's instructions, provides sufficient guarantees that the processing will meet the applicable statutory requirements, and implements appropriate technical and organisational measures to ensure the protection of data subjects' rights.

IX. Data security:

The Controller ensures that personal data are processed only for specified purposes and that access to the data is restricted and protected by security measures. It implements appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration or unauthorised disclosure, or unauthorised access to the data.

X. Rights of the data subject:

The data subject may request information about the processing of their personal data and access to the data processed about them; request rectification of inaccurate data, erasure of the data or restriction of their processing; exercise the right to data portability where the conditions of the GDPR are met; and object, on grounds relating to their particular situation, to processing based on legitimate interests. A request for access, rectification, erasure or restriction may also cover relevant AI output containing personal data, subject to the rights of other data subjects, trade secrets and protected legal positions. Data subjects may exercise their rights by e-mailing adatvedelem@rtl.hu. The Controller assesses the request without undue delay and, as a rule, within one month of receipt. Where an objection relating to the use of the custom GPT is well founded, the Controller will, where necessary, analyse the contract concerning the data subject without using the custom GPT, by means of manual legal review. No profiling or decision-making based solely on automated processing within the meaning of Article 22 GDPR takes place in the processing described in this Notice.

XI. Remedies:

If the data subject considers that the processing of personal data relating to them infringes their rights, they may contact the Controller or the data protection officer by e-mail at adatvedelem@rtl.hu, lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (registered office: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, P.O. Box 9; telephone: +36 (1) 391-1400; e-mail: ugyfelszolgalat@naih.hu; website: <https://naih.hu/>), and, at their option, may also bring proceedings before the competent court of their place of residence or temporary residence. A list of regional courts is available at the following link: <https://birosag.hu/ugyfeleknek/birosagok/torvenyszekek>

This Privacy Notice is effective from 11 September 2026.