<div align="center">**DATA PROCESSING NOTICE**</div>

1. PURPOSE OF THE DATA PROCESSING NOTICE

Caladrius-Med Ltd. (Registered Office: 1139 Budapest, Teve utca 24-28, Company Registration Number: 01-09-330378, Tax Number: 26527206-2-41, Represented by: Dr. Vass Anna Zsófia, Managing Director, hereinafter referred to as the Provider, Data Controller) as the data controller complies with data protection laws and guidelines and considers the contents of this legal notice binding upon itself.

This Notice is adopted for the purpose of providing all essential information and explanations in a concise, transparent, understandable, and easily accessible form, clearly and in plain language, to natural persons and legal persons' representatives (hereinafter referred to as "Users") who use our services, and to assist Users in exercising their rights.

Our obligation to inform is based on Article 12 of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), which has been applicable since May 25, 2018, Section 16 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Info Act), and Section 4 of Act CVIII of 2001 on Electronic Commerce Services and Certain Issues Related to Information Society Services.

This Notice has been prepared taking into account the GDPR, the Info Act, and other relevant legislation concerning specific data processing activities.
In the design and implementation of this Notice, we have acted in accordance with the recommendations on data protection requirements for prior information issued by the National Authority for Data Protection and Freedom of Information, as well as in the spirit of accountability as set out in Article 5(2) of the GDPR.

We also monitor the European Union's practices regarding the protection of personal data; accordingly, we incorporate the guidelines on transparency issued by the Article 29 Working Party of the European Commission into our data processing practices.

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2. DATA CONTROLLER INFORMATION

Caladrius-Med Ltd.
(Registered Office: 1139 Budapest, Teve utca 24-28, Company Registration Number: 01-09-330378, Tax Number: 26527206-2-41, Represented by: Dr. Vass Anna Zsófia, Managing Director.)

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3. SCOPE OF THE PROCESSED PERSONAL DATA

For some of our services, a separate, specific data processing notice is provided, which, together with this general Data Processing Notice, is applicable.

3.1. TECHNICAL DATA

In managing personal data during the provision of our services, the Data Controller selects and operates the IT equipment in such a way that the processed data:

- Is accessible to those entitled to access it (availability);
- Has ensured authenticity and authentication (integrity of data processing);
- Has verifiable unaltered state (data integrity);
- Is protected against unauthorized access (data confidentiality).

The Data Controller protects the data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as accidental loss.

The Data Controller ensures the security of data processing with technical, organizational, and administrative measures that provide a level of protection appropriate to the risks associated with the data processing.

During data processing, the Data Controller maintains confidentiality: protecting the information so that only authorized persons have access; ensuring integrity: safeguarding the accuracy and completeness of the information and the processing methods; and ensuring availability: making sure that when an authorized user needs access, the desired information is available, along with the necessary tools to access it.

3.2. COOKIES

3.2.1. FUNCTION OF COOKIES

Cookies collect information about visitors and their devices; they remember the visitors' individual settings, which can be used, for example, during online transactions so that users do not have to re-enter them; they facilitate the use of the website; and they provide a quality user experience.

For personalized service, a small data package known as a cookie is placed on the user's computer and is read back during subsequent visits. If the browser sends back a cookie previously stored, the service provider managing the cookie may link the user's current visit with past visits, but solely with regard to its own content.

3.2.2. SESSION COOKIES (ESSENTIAL COOKIES)

The purpose of these cookies is to ensure that visitors can navigate the www.caladrius.hu website completely and smoothly, use its functions, and access the services available on the site. These types of cookies remain valid until the end of the session (browsing), and are automatically deleted from the computer or any other device used for browsing when the browser is closed.

3.2.3. THIRD-PARTY COOKIES (ANALYTICS)

The www.caladrius.hu website also utilizes cookies from third parties, such as Google Analytics. By using the statistical service Google Analytics, www.caladrius.hu collects information regarding how visitors use the website. The data is used for the purpose of website development and improving the user experience.

These cookies remain on the visitor's computer or in the browser of any other device used for browsing until they expire or until the visitor deletes them.

3.2.4. LIST OF COOKIES USED ON THE DATA CONTROLLER'S WEBSITES

Name Provider Detailed Description Expiration Type

Name	Domain	Expiry	Type
cookiefirst-consent **Purpose:** This cookie saves your cookie preferences for this website. You can change these or withdraw your consent easily.	caladrius.hu	12 months	Cookie
cookiefirst-consent **Purpose:** This cookie saves your cookie preferences for this website. You can change these or withdraw your consent easily.	caladrius.hu	Persistent	Local storage
cookiefirst-id **Purpose:** This cookie contains your unique ID so CookieFirst can identify unique visitors to this website.	caladrius.hu	Persistent	Local storage
laravel_session `new` **Purpose:** Laravel Session cookie	caladrius.hu	1 hour 59 minutes 57 seconds	Cookie

Name	Domain	Expiry	Type
XSRF-TOKEN `new` **Purpose:** This cookie is written to help with site security in preventing Cross-Site Request Forgery attacks.	caladrius.hu	1 hour 59 minutes 57 seconds	Cookie

Performance

Name	Domain	Expiry	Type
_ga new **Purpose:** Registers a unique ID for a website visitor to track how the visitor uses the website. The data is used for statistics. Data transfer to third countries: USA. Google LLC. is certified under the Data Privacy Framework, indicating that your rights as a data subject can be guaranteed.	.caladrius.hu	2 years 4 days 23 hours 59 minutes 57 seconds	Cookie
_ga_******** new **Purpose:** This cookie stores a unique ID for a website visitor and tracks how the visitor uses the website. The data is used for statistics. Data transfer. to third countries: USA. Google LLC. is certified under the Data Privacy Framework, indicating that your rights as a data subject can be guaranteed.	.caladrius.hu	2 years 4 days 23 hours 59 minutes 57 seconds	Cookie

Name	Domain	Expiry	Type
_gat_UA-**** `new` **Purpose:** The _gat_UA cookie is a variation of the Google Analytics _gat cookie. It is used to limit the collection of data on high-traffic websites. The cookie is set by the Google Analytics tracking code and it contains the unique ID of the tracking account or website to which it relates. The _gat_UA cookie is typically used to throttle the request rate, which means it limits the amount of data that Google Analytics can collect from the website.	.caladrius.hu	56 seconds	Cookie
_gid `new` **Purpose:** Registers a unique ID for a website visitor to track how the visitor uses the website. The data is used for statistics. Data transfer to third countries: USA. Google LLC. is certified under the Data Privacy Framework, indicating that your rights as a data subject can be guaranteed.	.caladrius.hu	23 hours 59 minutes 57 seconds	Cookie

Advertising

Name	Domain	Expiry	Type
_fbp `new` **Purpose:** This cookie is used by Facebook for advertising purposes and conversion tracking.	.caladrius.hu	2 months 4 weeks 1 day 23 hours 59 minutes 57 seconds	Cookie

Name	Domain	Expiry	Type
_gcl_au new **Purpose:** This cookie is set by Google Adsense for experiments with 'cross-website' advertising.	.caladrius.hu	2 months 4 weeks 1 day 23 hours 59 minutes 57 seconds	Cookie
lastExternalReferrer new **Purpose:** This item is used to determine the origin of your visit.		Persistent	Local storage
lastExternalReferrerTime new **Purpose:** This item is used for visitor evaluation		Persistent	Local storage

4. GENERAL DATA PROCESSING POLICY

The data processing activities of the Data Controller are based on various legal grounds and, in all cases, comply with EU legal regulations, namely Regulation 679/2016 (GDPR), which must be applied in Hungary with the modifications set forth in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info Act).

In cases where data processing is based on voluntary consent, data subjects may withdraw their consent at any stage of the processing.

4.1 DATA RELATED TO ONLINE ORDERS

Through the website, it is possible to order services and make appointments. During this process, the following personal data are requested:

- Name
- Email address
- Phone number
- Residential address
- Animal's name, breed, and sex

For certain services, such as website maintenance, additional personal data may also be provided.

Purpose of the data processing, intended use of the processed data:
The data are used for fulfilling the order.

Legal basis for the data processing:
Contract (GDPR Article 6(1)(b)).

Retention period:
Duration of the business relationship plus an additional 5 years.

4.2 DATA RELATED TO ONLINE INQUIRIES

The personal data requested during contact are:

- Name
- Email address
- Phone number
- Residential address
- Animal's name, breed, and sex

Purpose of the data processing, intended use of the processed data:
The data are used for contacting and fulfilling the order.

Legal basis for the data processing:
Voluntary consent.

Retention period:
Duration of the business relationship plus 5 years; if no business relationship is established: withdrawal of consent shall trigger a deletion request.

4.3 DATA RELATED TO TELEPHONE INQUIRIES

The personal data requested during contact are:

- Name
- Email address
- Phone number
- Residential address
- Animal's name, breed, and sex

Intended use of the processed data:
The data are used for contacting and fulfilling the order.

Purpose of the data processing, intended use of the processed data:
The data are used for contacting and fulfilling the order.

Legal basis for the data processing:
Contract.

Retention period:
Duration of the business relationship, or until a deletion request is received.

4.4 DATA RELATED TO THE NEWSLETTER

The personal data requested during newsletter subscription are:

- Name
- Email address
- Phone number
- Animal's name, breed, and sex

Subscription to the newsletter is available after reviewing and accepting the Data Processing Policy. Acceptance is made by checking a pre-filled mandatory checkbox.

After subscription, the subscriber receives an email notification regarding the subscription, which must be confirmed; the subscription becomes effective thereafter.

During all related processes, the client retains the possibility to unsubscribe. Every newsletter includes an unsubscribe link that can be easily accessed with a single click.

Since the newsletter contains the company's name and website contact details, it qualifies as advertising.

Purpose of the data processing, intended use of the processed data:
The data are used for sending out a newsletter that includes advertising. The newsletter contains the website address, thereby qualifying it as advertising.

Legal basis for the data processing:
Voluntary consent.

Retention period:
Until unsubscription.

4.5 CLIENT CONTACT DATA

- Name
- Email address
- Phone number
- Residential address
- Animal's name, breed, and sex

Purpose of the data processing, intended use of the processed data:
The data are used for contacting and maintaining communication.

Legal basis for the data processing:
The legitimate interest of the Data Controller.

Retention period:
Duration of the business relationship plus 5 years.

4.6 DATA RELATED TO INVOICING
When entering into a contract for the services ordered with its clients, the Data Controller stores the following data:

- Name
- Email address
- Residential address
- Animal's name, chip number

Purpose of the data processing, intended use of the processed data:
Invoicing.

Legal basis for the data processing:
Statutory requirement.

Retention period:
According to statutory requirements: the current year plus 5 years.

4.7 OWNER INFORMATION (CHIP)

For certain animals, the Data Controller is obligated to process data in an official register for tracking vaccination status and other reasons, and, in the case of stray animals, to maintain the notification address and phone number.

Data collected include:

- Owner's name
- Animal data
- Email address
- Residential address
- Phone number

Purpose of the data processing:
Rabies prevention, tracking, and care of stray animals.

Legal basis for the data processing:
Legitimate interest and statutory requirement.

Retention period:
According to statutory requirements, for the lifetime of the animal.

5. PHYSICAL STORAGE LOCATIONS OF THE DATA

Your personal data (i.e., data that can be associated with you personally) may enter our processing in the following ways:

- On one hand, technical data related to the internet connection maintained by your computer, browser, IP address, and visited pages are automatically generated in our computer system.
- On the other hand, you may also provide your name, contact details, or other data when you wish to get in touch with us during the use of the website.

The technical data recorded during the operation of the system include those data of the user's computer that are automatically logged by the systems of www.caladrius.hu as a result of technical processes.

The automatically recorded data is logged by the system automatically at login and logout, without any additional declaration or action by the user.

6. DATA PROCESSORS

6.1. In connection with the operation of the website

For personal data provided during the use of the website, the hosting provider, as the data processor, is entitled to access such data.
NGROUP Ltd. / 1134 Budapest, Lehel utca 9. A., 2nd floor, door 3.

6.3. In connection with social media platforms

Our website is present on several social media platforms (e.g., Facebook, LinkedIn, Twitter, Google+, Instagram, YouTube); thus, for example, if a User "likes" our page on Facebook or "follows" us on Twitter, we obtain all personal data associated with their profile that is publicly available. Relevant information regarding data processing on these platforms can be found in the respective provider's own Data Processing Policy.

6.4. In connection with invoicing

In connection with invoicing, the tax authority is entitled to access the personal data provided by Users for this purpose during its operations. The data of the tax authority:

- National Tax and Customs Administration
  Website, contact details: https://www.nav.gov.hu/nav/kapcsolat
- Adóreform Ltd. / 2330 Dunaharaszti Fő út 250.

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7. RIGHTS OF THE DATA SUBJECTS AND REMEDIES

We place great importance on ensuring that our data processing complies with the principles of fairness, lawfulness, and transparency. In this section, we briefly outline the individual rights of data subjects.

Our Users may request free information regarding the processing of their personal data, and, in cases defined by law, request the rectification, deletion, blocking, or restriction of processing, and object to the processing of such personal data. Requests for information and the applications mentioned in this section can be addressed to: info@caladrius.hu.

Right of Access

Users may receive feedback from us regarding the processing of their personal data and access those personal data, as well as details of their processing.

Right to Rectification

Upon request, we will promptly correct any inaccurate personal data relating to the User, without undue delay. The User is also entitled to request the supplementation of incomplete personal data – including via an additional statement.

Right to Erasure

Upon request, we will delete the personal data relating to the User if they are no longer required for processing, or if the User withdraws their consent, or objects to the data processing, or if the processing is unlawful.

Right to be Forgotten

Upon the User's request for erasure – if applicable – we will endeavor to notify all recipients to whom the User's personal data may have been disclosed or become known.

Right to Restriction of Processing

Upon the User's request, we will restrict the processing of personal data if the accuracy of the data is disputed, if the processing is unlawful, if the User objects to the processing, or if we no longer require the data.

Right to Data Portability

Users may receive the personal data they have provided in a structured, commonly used, and machine-readable format, and may transmit those data to another data controller.

Right to Object

Users are entitled to object at any time, on grounds relating to their particular situation, to the processing of their personal data based on legitimate interest. In such cases, the personal data may no longer be processed for that purpose unless we can demonstrate that the processing is justified by compelling legitimate reasons that override the User's interests, rights, and freedoms, or that are related to the establishment, exercise, or defense of legal claims. In the event of an objection, the personal data will not be further processed for that purpose.

Response to Requests

We will examine requests within the shortest possible time, but in any case within 30 days – or 15 days in the case of an objection – from receipt of the request, and will decide on its merits. We will inform the applicant in writing of our decision. If we do not comply with the User's request, our decision will include the factual and legal reasons for the rejection.

Legal Remedies

We place great importance on the protection of personal data while respecting Users' right to informational self-determination; therefore, we strive to respond to every request in a fair manner and within the stipulated deadlines. Accordingly, we kindly ask Users to contact us to resolve any conflicts amicably before resorting to administrative or judicial enforcement.

If the inquiry does not yield a result, the User may:

- Assert their rights before a court under Act V of 2013 on the Civil Code (the case may also be initiated before a court competent based on the User's place of residence or stay; a list of the courts and their contact details can be viewed via the following link: http://birosag.hu/torvenyszekek), and
- File a complaint with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11; phone: +36-1-391-1400; fax: +36-1-391-1410; email: ugyfelszolgalat@naih.hu; website: https://www.naih.hu; hereinafter: NAIH) as provided by the Info Act.

Procedure Related to Requests for Exercising Rights

Notification of Recipients

In cases of rectification, deletion, or restriction of processing, we will notify the recipients with whom or to whom the User's personal data have been disclosed, unless this proves impossible or requires disproportionate effort. Upon request, we will provide the User with information about these recipients.

Method and Deadline of Notification

We will provide electronic notification of the measures taken in response to requests within one month from receipt of the request – unless the User requests otherwise. This deadline may be extended by an additional two months if necessary, taking into account the complexity of the request or the number of requests. We will inform the User of any extension, including the reasons for it, within one month of receiving the request.

Upon request, oral information may also be provided, provided that the User can otherwise verify their identity.

If we do not take action in response to the request, we will notify the User of the reasons for this within one month of receipt of the request, and inform them that they may file a complaint with the NAIH and exercise their right to judicial remedy.

Verification

In exceptional cases, if we have justified doubts about the identity of the natural person submitting the request, we will ask for further information necessary to confirm their identity. This measure is required in order to enhance the confidentiality of the data processing, i.e. to prevent unauthorized access to personal data, as stipulated in Article 5(1)(f) of the GDPR.

Costs for Information and Measures

The information provided in response to requests, as well as any measures taken, are provided free of charge. If the User's request is clearly unfounded or – particularly due to its repetitive nature – excessive, considering the administrative costs associated with providing the requested information or taking the requested measures, we may charge a reasonable fee or refuse to take action based on the request.

Data Protection Incident

A data protection incident is any breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, the processed personal data. In the event of a data protection incident, we are obliged to act in accordance with Articles 33 and 34 of the GDPR. We record data protection incidents, detailing the facts related to the incident, its effects, and the measures taken to remedy it.

We reserve the right to unilaterally modify this Notice at any time.

Budapest, 2025.03.28.
Caladrius-Med Ltd.
Data Controller