Privacy Policy

Effective: 23 September 2026

Disclaimer: This is an unofficial English translation of our Hungarian Privacy Policy. In case of any legal questions or disputes, the original Hungarian version is the authoritative document.

We present our data processing procedures below.

1. Name and Contact Information of the Data Controller

Company Name: STRT Invest Zrt.
Registered Office: 1024 Budapest, Lövőház utca 39. földszint
Company Registration Number: 01-10-143011
CEO: Péter Zoltán Balogh
Website: https://strtinvest.com/
E-mail: adatkezeles@strt.hu

hereinafter referred to as "**STRT**" or "**Data Controller**"

2. Specific Data Processing Activities

2.1. Data Processing related to Newsletter Subscription

On the Website, you have the option to subscribe to our newsletter to stay informed about news and information concerning STRT Invest.

Processed Data	Purpose of Processing	Legal Basis	Retention Period
Name, e-mail address.	Sending email newsletters to interested parties.	The data subject's consent (Article 6(1)(a) of the GDPR).	Until you withdraw your consent to receive the newsletter.

Individuals authorized to access the Data: The Data Controller's colleagues in sales, education, and marketing.

Our Data Processors:

a) For the purpose of recording and storing data provided during newsletter subscriptions, as well as for sending newsletters and information, the Data Controller uses the systems of the following companies:

- Active Campaign database: Active Campaign LLC (registered office: 1 North Dearborn Street, 5th Floor, Chicago, Illinois 60602, USA)
- Airtable database: Formagrid Inc. (registered office: 799 Market Street, 8th Floor, San Francisco, California 94103, USA)
- MiniCRM: MiniCRM Zrt. (registered office: 1075 Budapest, Madách Imre út 13-14.)

2.2. Data Processing related to Investment Application

On the Website, you have the option to send your pitch deck.

Processed Data	Purpose of Processing	Legal Basis	Retention Period
Name, company name, email, information related to the business concept.	Making an investment decision.	The data subject's consent (Article 6(1)(a) of the GDPR).	Until the end of the 2nd month following the investment decision.

Individuals authorized to access the Data: The Data Controller's colleagues handling investments.

Our Data Processor:

a) For the purpose of recording and storing data provided during the investment application, as well as for sending information related to the decision, the Data Controller uses the system of the following company:

- Google LLC (registered office: 1600 Amphitheatre Parkway, Mountain View, California 94043, USA)

3. Data Security

STRT pays close attention to the protection of personal data and handles it in accordance with the highest security standards. Personal data is stored on our own or our data processors' highly protected servers, and access is only possible based on strictly controlled authorizations. To protect the servers and systems, we use multi-factor authentication, firewalls, and modern encryption procedures to prevent unauthorized access. In addition to physical and technical protection, STRT employees also receive regular data security training, ensuring that they act in accordance with the latest regulations and guidelines related to data management and protection. We ensure the confidentiality, integrity, and availability of personal data by continuously monitoring and logging data management operations and access.

4. Recipients of Personal Data, Categories of Recipients

Your personal data is accessed by the STRT colleagues specified in section 2 above, data processors, and, in the case of data transfer, the other independent data controllers specified therein. We would like to draw your attention to the fact that during data processing, STRT also provides access to the data to certain employees of the following companies belonging to its group of companies, as joint data controllers, if the activities of these employees are necessary for the proper provision of the services offered by STRT:

- STRT Holding Nyrt. (registered office: 1024 Budapest, Lövőház utca 39. földszint; company registration number: 01-10-142074)
- STRT Management Kft. (registered office: 1024 Budapest, Lövőház utca 39. földszint; company registration number: 01-09-427488)
- STRT Alapkezelő Zrt. (registered office: 1024 Budapest, Lövőház utca 39. földszint; company registration number: 01-10-143115)
- DJ SPV Kft. (registered office: 1024 Budapest, Lövőház utca 39. földszint; company registration number: 01-09-412063)

5. Processing of Special Categories of Data

The Data Controller does not process special categories of data in the course of this data processing and does not process the data of individuals under 18 years of age.

6. Other Information Related to Data Processing

STRT will always inform you about data processing activities not covered in this policy when the data is collected. We also inform you that courts, prosecutors, investigative authorities, misdemeanor authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information (NAIH, Nemzeti Adatvédelmi és Információszabadság Hatóság), or other bodies may contact STRT based on legal authorization to provide information, disclose or transfer data, or make documents available. In such cases, STRT will only provide the authorities with as much data as is necessary to achieve the purpose of the request—provided that the authorities have specified the exact purpose and scope of the data—and as required by law.

7. Accuracy of Data and Your Responsibility

STRT does not verify the accuracy of the data provided, so you are responsible for its correctness. If you provide personal data of a third party in connection with any data processing you are obligated to obtain the consent of the data subject.

8. Data Subject Rights in Relation to Data Processing

8.1. Right to Access

You can request information from us at any time about what data STRT processes about you. This includes the purpose of the data processing, the recipients to whom we have forwarded your data, the source of the data, the retention period, and your rights related to data processing. You are also entitled to request a copy of the data. Requesting a copy must not adversely affect the rights and freedoms of others. If a recording is made of you and others are also identifiable on it, STRT will use technical solutions (e.g., masking or distortion) to protect the rights of third parties. If your request is excessive or clearly unfounded, STRT may charge a fee or refuse to fulfill the request. If the legal basis for data processing is STRT's legitimate interest, you can request the results of the balancing test at any time.

8.2. Right to Rectification

STRT will rectify or supplement the personal data you provide upon your request if it is inaccurate.

8.3. Right to Erasure (Right to be Forgotten)

STRT will erase your personal data without undue delay if it is no longer needed for processing, if the data processing is unlawful, or if you withdraw your consent and there is no other legal basis for the data processing. Erasure cannot take place if the data processing is necessary for the freedom of expression, compliance with a legal obligation, or the enforcement of legal claims.

8.4. Right to Restriction of Processing

You have the right to request that STRT restrict the data processing if it is unlawful but you do not want us to erase the data, or if the purpose of the data processing has ceased, but you still require the data to enforce your legal claims.

8.5. Right to Data Portability

You are entitled to receive the personal data you provided that is processed by STRT, and to request that we transmit it to another data controller if the legal basis for the data processing was your consent.

8.6. Right to Object

If the legal basis for the data processing is the legitimate interest of STRT or a third party, you have the right to object to the data processing. STRT will only refuse the objection if it can demonstrate compelling legitimate grounds for the data processing which override your interests, rights, and freedoms, or if the data processing is necessary for the establishment, exercise or defense of legal claims.

8.7. Right to Complain and Right to Legal Remedy

If you believe that STRT is violating your data processing rights, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH).
NAIH's contact information:

- **Website:** http://naih.hu/
- **Postal address: 1363 Budapest, Pf.: 9.**
- **Address: 1055 Budapest, Falk Miksa utca 9-11.**
- **Phone: +36 (1) 391-1400**
- **Fax: +36 (1) 391-1410**
- **E-mail: ugyfelszolgalat@naih.hu**

Furthermore, you can turn to a court in accordance with the rules of the GDPR and the Info tv.. Your detailed rights and legal remedies are contained in Chapters III and VIII of the GDPR and Section 23 of the Info tv..

8.8. Response to Data Subject Request

STRT ensures that if you contact us to exercise your rights, we will respond to your request without undue delay, but no later than within 30 days, and we will take all necessary measures to ensure that your rights can be properly exercised. Please send any questions or comments related to this Policy, or requests to exercise your data subject rights, to the email address or postal address specified in section 1.