

## DATA PROTECTION NOTICE

### about the "MOL GO" Application data processing operations

effective from 5th of September, 2018 until withdrawal

	Name and purpose of the data processing	Legal basis of the data processing	Scope of processed data and their source	Duration of data processing	Recipient of data transfers	Data processor and the data processing activity
I.	<p><b>Ensuring registration and contracting for MOL GO Application ("Application"), the operation of the Application, including keeping contact with Users, as well as providing Services under the GTC (General Terms and Conditions).</b></p> <p>General Terms and Conditions of using the Application are available at the following link: <a href="http://www.mol.hu/go/legal">www.mol.hu/go/legal</a></p> <p><b>Person under the age of 16 can not register into the Application</b> and can not claim entitlement of the services offered through it, and the advantages granted. After downloading the Application, declaration is required for the further use of the Application, i.e.</p>	Article 6. (1) b) of the GDPR (performance of the contract regarding the use of the Application).	Name, email address, the fact that the registrant has reached the age of 16 or not, password (password stored at the MOL hosted server in an encrypted form), date of registration, the fact of registration with a Facebook profile, the fact of registration with a Google profile, the fact of participating in the MOL Multipoint Program (if this information is voluntarily provided by the User), User's Multipoint balance, list of transactions from the past 90 days, details of each transaction (if the user volunteered to participate in the Multipoint Program), the fact that the user permits the Application to use the	During the use of the Application, and <b>5 years</b> after termination of use. Any contracting party may enforce a civil claim for that period against the other party in accordance with the 6:22 (1) of the Act V of 2013 on the Civil Code ("Civil Code").	<p>In case of a request from an authority - transferring the requested data to the authority.</p> <p>MOL Nyrt. and Multipont Program Zrt. are joint controllers, there is no other data transfer.</p>	<p><b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (1117 Budapest, Budafoki út 79.) – provides IT and server services closely related to the data processing.</p> <p><b>AutSoft Kft.</b> (1117 Budapest, Neumann János u. 1. Infopark A building, ground floor) – provides IT services closely related to the data processing (Application development).</p>

	that the person wishing to register has reached the age of 16 or not.		locating data of the mobile device (geolocation, GPS), the fact that which consents were granted by the user regarding to the use of the Application.  Source of data: taken from the data subject.			
II.	<b>Route planning and other convenience services</b>	<p>Article 6. (1) a) of the GDPR (the data subject's voluntary consent).</p> <p>Without the consent the location data (GPS) cannot be processed.</p> <p>The data subject may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal.</p>	<p>Name, email address, the User's phone location data (GPS), the data relating to the type of debit, credit, corporate or discount card provided by the User, the number of Multipoint Card.</p> <p>For example: with the location data, the Application can recommend the User the closest gas stations; if the User enters a geolocation zone – if he or she provided consent – the Application based on the location can offer different coupons, discounts.</p> <p>Users have the opportunity to select in the Application the types of cards that they own.</p>	Until the data subject withdraws his or her consent.	<p>In case of a request from an authority - transferring the requested data to the authority.</p> <p>MOL Nyrt. and Multipont Program Zrt. are joint controllers, there is no other data transfer.</p>	<p><b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (1117 Budapest, Budafoki út 79.) – provides IT and server services closely related to the data processing.</p> <p><b>AutSoft Kft.</b> (1117 Budapest, Neumann János u. 1. Infopark Infopark A building, ground floor) – provides IT services closely related to the data processing (Application development).</p>

			<p>User can indicate in the Application whether he or she has a given type of debit, credit, discount or corporate card. Based on the types of cards indicated by the User can the Application can make suggestions about the closest gas station where one can pay with a type of card that the User indicated.</p> <p>MOL Nyrt. has the right to change the scope of card types that can be indicated in the Application.</p> <p>After installing and opening the Application the Application requests the User in a pop-up window to allow using location. The search service can only be used and the User will only receive information about the offers and services from gas stations closest to his current location, if the User allows the above-mentioned use of location. The Application – in the absence of different User settings –only uses the User’s location as a default setting,</p>			
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			if the Application or some of its functions appear on the screen of the User's phone (see: it can be checked in the phone's location settings). The User has the opportunity to turn location functions off with regard to the Application, however in such case he/she cannot access the searching services.			
III.	<b>eDM: General marketing (advertisement) messages, promotional offers, sending coupons via e-mail or through the Application, if the User downloads it.</b>	<p>Article 6. (1) a) of the GDPR (the data subject's voluntary consent).</p> <p>Article 6. Section (1) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities – natural person user's clear, prior and express consent.</p> <p>Without the consent the data</p>	<p>Name, email address and Multipont Card number of the User, the User's phone location data (geolocation, GPS), data types of the card registered by the User in the Application (if provided by the user in the Application).</p> <p>Source of data: received from the data subject.</p> <p>From the data described above the GPS data is necessary to indicate the gas station closest to the User, which is necessary to create the most comfortable service for the User.</p> <p>For example: By using the location data the Application</p>	Until the data subject withdraws his or her consent.	In case of a request from an authority - transferring the requested data to the authority.	<p><b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (1117 Budapest, Budafoki út 79.) - provides IT and server services closely related to the data processing.</p> <p><b>AutSoft Kft.</b> (1117 Budapest, Neumann János u. 1. Infopark A building, ground floor) – providing IT services and e-mail sending services closely related to the</p>

		<p>controllers will not send the data subject general marketing (advertisement) messages, promotional offers and coupons.</p>	<p>can send the User offers, that are closest to his/her current location.</p> <p>The Application based on the card types indicated by the User can make suggestions about the closest gas station where one can pay with a card type that the User indicated.</p>			<p>data processing, the development of the Application.</p>
IV.	<p><b>Market research and satisfaction survey with regard to the Services available in the Application for the purpose of further development of those Services (e.g.: to make them even easier to use for Users).</b></p> <p>Registration of market research subjects, sending research invitations, conducting market research.</p>	<p>Article 6. (1) a) of the GDPR (the data subject's voluntary consent).</p> <p>Without the consent the data subject cannot participate in market research.</p>	<p>Name, address, e-mail address, Multipont Card number, card usage data, the User's phone location data (geolocation, GPS), the data obtained or created during the market research.</p> <p>MOL Nyrt. creates aggregated data, statistics from the obtained data for the purpose of developing the service.</p> <p>Source of data: received from the data subject.</p>	<p>Until the data subject withdraws his or her consent.</p>	<p>MOL Nyrt. and Multipont Program Zrt. are joint controllers, there is no other data transfer.</p>	<p><b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (1117 Budapest, Budafoki út 79.) - provides IT and server services closely related to the data processing.</p> <p>If other data processors are involved we indicate them at our website: <a href="http://www.mol.hu/go/legal">www.mol.hu/go/legal</a></p>
V.	<p><b>Prevention, detection and investigation of fraud and misuse in connection with the MOL GO</b></p>	<p>Article 6 (1) f) of the GDPR (data processing is</p>	<p>Name, e-mail address, data registered in the Application by the User, the data</p>	<p>The period of time necessary to conduct the</p>	<p>MOL Nyrt. and Multipont Program Zrt. are joint</p>	<p><b>MOL Magyarország Informatikai</b></p>

	<p><b>services provided through the Application</b></p> <p>The Ethical and Business Conduct Code, Business Partner Ethical Code, Ethical Council Procedural Rules („<b>Ethical Code</b>”) of MOL Group that is governing the prevention, detection and investigation of fraud and misuse are available here: <a href="https://mol.hu/hu/molrol/etika-es-megfeleles/etika/">https://mol.hu/hu/molrol/etika-es-megfeleles/etika/</a></p>	<p>needed to pursue the legitimate interests of the data controllers).</p> <p>Legitimate interest: the prevention, detection of infringements endangering the data controllers’ assets, trade secrets, intellectual property, business reputation; appropriate, respect-based, fear and retaliation free work environment and also the prosecution of liable persons for those infringements.</p> <p>The legitimate interest balancing test is available at:</p>	<p>produced while conducting the investigation. The data controllers are processing the data necessary to conduct the investigation and as long as the investigation requires, so that they can discover and investigate the possible misuse of the Application.</p>	<p>investigation, but at least as long as users are registered and also <b>5 years</b> after the termination of registration. This is the period of time during which any party can enforce its civil law claim against the other party based on section 6:22 of the Civil Code.</p>	<p>controllers, there is no other data transfer.</p>	<p><b>Szolgáltató Kft.</b> (1117 Budapest, Budafoki út 79.) - provides IT and server services closely related to the data processing.</p>
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VI.	<b>Complaint management in connection with the MOL GO Services (we provide separate information about this at: <a href="https://mol.hu/hu/kapcsolat/">https://mol.hu/hu/kapcsolat/</a>)</b>	The provisions laid down in the separate notice apply.	The provisions laid down in the separate notice apply.	The provisions laid down in the separate notice apply.	MOL Nyrt. and Multipont Program Zrt. are joint controllers, there is no other data transfer.	<b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (1117 Budapest, Budafoki út 79.) - provides IT and server services closely related to the data processing.
VII.	<b>Requesting Feedback regarding the Application; communication, answering question, data reconciliation with Users or those individuals who do not qualify as Users in writing or electronic mail (e-mail, message send via the Application); the operation of a “question-answer system” at AppStore and at Facebook fan page created to popularise the MOL GO service.</b>	Article 6. (1) a) of the GDPR the data subject’s voluntary consent, which the individual provides by requesting/asking questions/writing comments and sending the data contained in those to MOL Nyrt. in the scope that is necessary to answer the	The private data included in the User’s request or written or electronic mail (in e-mail, in the message sent via the Application, in the Applications’ AppStore review section or MOL GO’s Facebook page).  The data appearing on Apple AppStore’s special surface for reviews about the Application are the following: name, profile picture, version of the mobilephone, type of operational system and its version number, the data	Until the consent of the individual is withdrawn; in the absence of this, for <b>5 years</b> in accordance with section 6:22 of the Civil Code, due to Company’s possible enforcement of civil law claims, furthermore to defend itself against the individual’s civil law claims.	If the relevant data are necessary for MOL Nyrt. to enforce its civil law claims or to protect itself against civil law claims of the individual, then MOL Nyrt. is allowed to forward those data to the law firms that are legally representing the Company and that are under strict legal duty of confidentiality.	<b>MOL Magyarország Társasági Szolgáltatások Kft.</b> (1117 Budapest, Október huszonharmadik a utca 18.) – management of post correspondence  <b>MOL Magyarország Informatikai Szolgáltató Kft.</b>

		<p>question or handle the request (e.g.: providing information).</p> <p>Without the consent the data subject MOL Nyrt. is unable to answer the requests.</p> <p>The data subject may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal.</p>	<p>contained in the opinion.</p> <p>The User can express its opinion about the Service at MOL GO's Facebook fanpage. The data appearing on Facebook's surface: name, profile image, data contained in the opinion.</p> <p>In case of those individuals who do not qualify as Users: name, address, phone number, e-mail address, and the data included in the login.</p>	<p>In case of withdrawal of consent MOL Nyrt. will consider the meaning that the individual does not want to enforce any claims with regard to the request, the answer to it by MOL Nyrt., the related communication, data reconciliation</p>	<p>In case of a request from an authority - transferring the requested data to the authority.</p>	<p>(1117 Budapest, Budafoki út 79.) - provides IT and server services closely related to the data processing.</p>
VIII.	<p><b>Analytics: Google Analytics - <a href="https://marketingplatform.google.com/about/analytics/">https://marketingplatform.google.com/about/analytics/</a> - creates for MOL Nyrt. from anonym and aggregated data statistics regarding the use and operation of the Application. MOL Nyrt.</b></p>	<p>Article 6 (1) f) of the GDPR (data processing is needed to pursue the legitimate interests of MOL Nyrt.).</p>	<p><b>The analytics data appear at MOL Nyrt. only in an anonym, aggregated form.</b></p> <p>The Service Provider uses Google Analytics' services for website statistics, statistics regarding the</p>	<p>The data is stored for <b>5 years</b> from recording in accordance with section 6:22 of the Civil Code, due to Company's</p>	N/A	<p><b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (1117 Budapest, Budafoki út 79.) - provides IT and</p>



	<p><b>uses those anonym statistics to improve the Service.</b></p> <p>The Service Provider records the data of the people visiting to inspect and improve the operation of the service and also to ensure satisfactory service and prevent possible misuse.</p>	<p>The legitimate interest balancing test available at: <a href="http://www.mol.hu/go/legal">www.mol.hu/go/legal</a>.</p>	<p>Application, users' demographic data, interest and behaviour on the website and to be able to monitor the above mentioned.</p> <p>MOL Nyrt. sees for example the following anonym statistics: how many users have on a daily/monthly basis opened the Application, attendance data (desktop, mobile, tablet, etc.), where are the users that open the Application (e.g.: Hungary and the region within it), what kind of mobilephone they used (Apple, Samsung, Huawei, etc.), what language settings did they use, which mobile operator did they use, how long is the Application on the users' equipment open averagely, demographic trends (e.g.: x% of the users are of the following age), which windows did the Users open in the Application, etc.</p>	<p>possible enforcement of civil law claims, furthermore to defend itself against the individual's civil law claims.</p>		<p>server services closely related to the data processing.</p>
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			<p>To measure the attendance figure of the website and the Application the Service Provider uses the services of Google Analytics. As part of those services Google provides data that are not sufficient to establish the individual's identity.</p> <p>Google provides an opportunity to limit the use of analytic services. Visit Google's website to unsubscribe from Google Analytics using your data. <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a></p> <p>You can read about Google's data protection principles here: <a href="http://www.google.hu/policies/privacy/ads/">http://www.google.hu/policies/privacy/ads/</a></p> <p>The document called "How can Google use the data when you use one of partners' website of application" can be accessed at the following link: <a href="http://www.google.com/intl/hu/policies/privacy">http://www.google.com/intl/hu/policies/privacy</a></p>			
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			<p>/partners/</p> <p>The scope of data acquired by Google specifically include: individual identifiers, browser and settings, application and settings, device type and settings (the type of the used device, screen resolution, type of browser and language settings), operational system, mobile provider and the version number of the application, and what kind of interaction happens between Google and other applications, devices and browsers. The latter includes: the address of the visited website, the user's IP number, error notifications, operational actions, and also the date, time and relevant link of the request:</p> <p><a href="https://policies.google.com/privacy?hl=hu">https://policies.google.com/privacy?hl=hu</a>.</p>			
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**Data Controller(s) name, seat, phone number, website (where the data protection notices available) and the email address:**

- **MOL Nyrt.** (seat: 1117 Budapest, Október huszonharmadika u. 18., phone number: +36 1 886 5000, website: [www.mol.hu](http://www.mol.hu); email address: [ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu))
- **Multipont Program Zrt.** (seat:1117 Budapest, Budafoki út 79., phone number: +36 1 886 5000; website: [www.multipont.hu](http://www.multipont.hu); email address: [ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu))

MOL Nyrt. and the Multipont Program Zrt. are joint data controllers, in which the purpose and framework of the data processing are jointly defined and are jointly responsible for data processing. Data controllers have their own privacy notices.

- **Google LLC** (Google Data Protection Office 1600 Amphitheatre Pkwy Mountain View, California 94043; <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>) – Providing a Google Analytics service
- **Apple Inc.** - Providing for the use of applications reserved for this purpose in the Apple AppStore, use opinion sharing interface (seat: One Apple Park Way, Cupertino, California, USA,95014; <https://www.apple.com/legal/privacy/hu/>)
- **Facebook Ireland Ltd.** – Ensure the use of the MOL GO fan site on Facebook interface (seat: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland; <https://www.facebook.com/privacy/explanation> ).

Google, Apple and the Facebook act as independent data controllers which means that they may determine the purpose of data processing independently or jointly with others, make decisions and implement them, or have them implemented by a data processor engaged for that purpose. Data controllers have their own data protection notice.

**Contact person(s) of the Data Controller(s):**

- **MOL Kiskereskedelmi Ügyfélszolgálat**  
1117 Budapest, Október huszonharmadika u. 18  
+36 1 886 5000  
[ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu)

- **Google LLC** : <https://www.google.com/contact/>
- **Apple Inc.**: <https://www.apple.com/contact/>
- **Facebook Ireland Ltd.**: <https://www.facebook.com/help/?ref=pf>

**The Data Protection Officer(s) name and contact details in the Data Controller:**

- **MOL Nyrt.** - e-mail address: [dpo@mol.hu](mailto:dpo@mol.hu)
- **Multipont Program Zrt.** e-mail address: [dpo@mol.hu](mailto:dpo@mol.hu)

**Persons within the Data Controller who are authorised to have access to the personal data (per data processing purposes):**

- **MOL Nyrt.:** employees of Level Platforms and Integrated Solutions Group, counsels, IT members, managers, experts, employees of Corporate Analytics & Data Innovation and employees of Retail Loyalty.  
If MOL Nyrt. initiates an Ethics Review, members of the Ethics Council will have access to the data required for the investigation.
- If MOL Nyrt. initiates another procedure for preventing, detecting and investigating fraud and abuses, employees of the Regional Security, Group Security and Internal Audit organizations have access to the data required for the investigation.
- **Multipont Program Zrt.:** employees of Loyalty, managers, experts
- Employees of **Google LLC**
- Employees of **Apple Inc.**
- Employees of **Facebook Ireland Ltd.**

**Data Processor(s) and other data controller recipient(s) name, seat, phone number, website (where the data protection notices available) and the email address:**

**MOL Magyarország Informatikai Szolgáltató Kft.**

(seat: 1117 Budapest, Budafoki út 79.; phone number: +36-70-373-2005; website: <https://mol.hu/hu/molrol/mol-magyarorszag-szolgáltato-kozpont-kft/#it-szolgáltatások>; email address: [ITU@mol.hu](mailto:ITU@mol.hu))

**MOL Magyarország Társasági Szolgáltatások Kft.** (seat: 1117 Budapest, Október huszonharmadika u. 18.; phone number: [06-1-464-0464]; website: [www.mol.hu](http://www.mol.hu); email address: [taszus@mol.hu](mailto:taszus@mol.hu))

**MOL Magyarország Pénzügyi Szolgáltató Kft.** – (seat: 1039 Budapest, Szent István utca 14., phone number: +36 1 886 5000, website: <https://mol.hu/hu/molrol/mol-magyarorszag-szolgáltato-kozpont-kft/#penzugyi-szolgáltatások>; email address: [LBesnyi@MOL.hu](mailto:LBesnyi@MOL.hu) )

**AutSoft Kft.** (seat: 1117 Budapest, Neumann János u. 1. Infopark A building, groundfloor, phone number: 06-70-9073300, website: <https://www.autsoft.hu/hu>; email address: [admin@autsoft.hu](mailto:admin@autsoft.hu))

**The contact person(s) of the Data Processor(s) and other data controller(s) recipient(s):**

- MOL Magyarország Informatikai Szolgáltató Kft. – [itu@mol.hu](mailto:itu@mol.hu)
  - MOL Magyarország Pénzügyi Szolgáltató Kft. – [mfs-penzforg\\_utas@mol.hu](mailto:mfs-penzforg_utas@mol.hu)
  - MOL Magyarország Társasági Szolgáltatások Kft. – [Postabonto\\_Kozpont\\_group@mol.hu](mailto:Postabonto_Kozpont_group@mol.hu)
- AutSoft Kft. - [admin@autsoft.hu](mailto:admin@autsoft.hu)

**The Data Protection Officer(s) name and contact details within the Data Processor:**

- Contact details of the Data Protection Officer of MOL Group member companies: [dpo@mol.hu](mailto:dpo@mol.hu)
- AutSoft Kft. – [gdpr@autsoft.hu](mailto:gdpr@autsoft.hu)

**Persons within the Data Processor who are authorised to have access to the personal data:**

- MOL Magyarország Informatikai Szolgáltató Kft. – IT members, employees of Communication Infrastructure Operators.
- MOL Magyarország Pénzügyi Szolgáltató Kft. – financial members, accounting experts, employees of MFS - Payroll Referral Organization.
- MOL Magyarország Társasági Szolgáltatások Kft. – mailing administrators, customer service staff, members of Post-recycling organization.
- AutSoft Kft. – IT members, members of software development.

**Processing special categories of personal data for the purpose specified in this Data Protection Notice:** No special categories of personal data is processed.

**Description of the process of the data processing:**

The Users who sign up to the MOL GO Application accepting or giving they consent to the processing their personal data subject to the data processing objectives set out above. MOL provides a Service to Users through the Application which allows Users to search for topics about MOL's current discounts (coupons), contents and services and MOL may make available other applications that MOL's contracted partners or MOL Group member companies offer thus that the User is able to obtain information about these applications.

**Data transfers to a third country:** Data is not transferred to a third country.

**The fact of automated decision making, also including profiling, and at least in such cases, at least information in comprehensible form about the applied logic and the significance of such data processing and the expectable consequences it may lead to for the data subject:** There is no automated decision making and profiling.

### **Data security measures:**

In order to guarantee the confidentiality, integrity and availability of the personal data, the Data Controller stores your data in a password-protected and/or encrypted database according to IT security standards and norms. The Data Controller ensures records of the data in accordance with risk-proportional protection and network, infrastructure and application-level protection (firewalls, antivirus programs, storage and communication encryption mechanisms for which asymmetric encoding, without the decryption key being encrypted data stream cannot be retrieved, blocking content and other technical and process solutions). The Data Controller continuously monitoring and processing privacy incidents.

The Data Controller plans and implements data processing operations to ensure the protection of the privacy of the data subjects through the application of GDPR and other data processing legislation.

The Data Controller ensures the security of the data, takes technical and organizational measures and establishes procedural rules that are necessary to enforce GDPR and other data protection and confidentiality rules.

The Data Controller protects the data with risk-proportional actions, in particular against unauthorized access, alteration, forwarding, disclosure, deletion or destruction as well as becoming inaccessible arising from changes in the technology used. In this context, the Data Controller stores the personal data of the data subject in a password protected and/or encrypted database. The Data Controller protects the data with firewall, antivirus software, encryption mechanisms, content filtering, and other technical and process solutions in the context of risk-proportional protection. The Data Controller constantly monitors the personal data breaches.

### **Your rights regarding the data processing:**

Your detailed rights and remedies are set forth in the applicable provisions of the GDPR (especially in articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80, and 82 of the GDPR). You may at any time request information about your data, request any correction, deletion, or restriction of processing of your data at any time, otherwise you may object to legitimate interest data processing and direct marketing messages and you have the right to data portability. Below we summarize the most important provisions.

**Commented [DM1]:** Kereszékkal olvasd el légyszí.



**Right to information:**

If the Data Controller is processing Your personal data, the Data Controller must provide information to You - without Your request - about the most important data processing features, such as the purpose, legal basis, duration of the data processing, the identity and contact details of the Data Controller and its representative (including the adequate and appropriate guarantees in case of data transfer to the third country), in the case of legitimate interest data processing, the legitimate interest of the Data Controller and/or third party, and your rights and remedies regarding your data processing (including the right to lodge a complaint to the supervisory authority), if You do not have this information. In the case of automated decision-making and profiling, the data subject shall be informed of the logic applied, as well as understandable information about the significance of such data processing and the likely consequences for the data subject. The Data Controller provides this information by providing You with the current data protection notice.

**Right of access:**

You have the right to obtain confirmation from the Data Controller that personal data concerning you are being processed. If yes, you are entitled to have access to the personal data concerned and certain information, including the purposes of the processing, the categories of personal data concerned, the recipients, the duration of data processing (planned), the rights and remedies of the data subject (including the right to lodge a complaint with a supervisory authority) and the personal data are collected from the data subject information as to their source. For Your request the Data Controller provides a copy of the personal data undergoing processing.

The Data Controller may charge a reasonable fee based on administrative costs for requested further copies. The right to request a copy may not adversely affect the rights and freedoms of others. About possibility of publishing a copy, its method, any costs and other details, the Data Controller provides you any information if You request it.

In the case of automated decision-making and profiling, the data subject has the right of access: the logic applied and to the significance of data processing and the likely consequences for the data subject.

**Right to rectification:**

You have the right to request Data Controller to rectify the inaccurate the personal data which concern you, without undue delay. Taking into account the purpose of data processing, you are also entitled to have incomplete personal data completed e.g. by a supplementary statement or otherwise.

**Right to erasure:**

You have the right to request, the Data Controller to erase the personal data concerning you without delay, and the Data Controller must erase the personal data concerning you without delay where the certain conditions are satisfied. Inter alia the Data Controller must erase the personal data when the personal data are no longer necessary in relation to the purposes for which they were collected, you withdraw your consent on which the processing is based, and no other legal ground subsists for the processing, the personal data have been unlawfully processed or you object to the processing and there are no overriding legitimate grounds for the processing, the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject and the collection of the personal data occurred in connection with offering services regarding the information society.

If the data processing is based on Your consent the consequence of the withdrawal of consent:

Please note that the withdrawal of your consent will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal.

**Right to restriction of processing:**

You have the right to obtain a restriction of processing from the Data Controller where one of the following applies:

- a) You contest the accuracy of the data in this case, the restriction concerns for a period enabling the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and You oppose the erasure of the personal data and request the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of the processing, but You require them for the establishment, exercise or defence of legal claims; or
- d) You have objected to processing based on the legitimate interest of the Data Controller pending the verification whether the legitimate grounds of the Data Controller override Your legitimate interests.

Where processing has been subject to the above restriction, such personal data shall, with the exception of storage, only be processed with Your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

The Data Controller informs You before the restriction of processing is lifted.

**Right to data portability:**

You have the right to receive Your personal data, which You have provided to the Data Controller in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Data Controller, where:

- a) the processing is based on Your consent or on a contract (in which You are a party); and
- b) the processing is carried out by automated means.

In exercising the right to data portability You have the right to request to the personal data transmitted directly from one controller to another, where technically feasible.

Exercising right to data portability shall not contravene to provisions concerning the right to erasure and, further, this right shall not harm the rights and freedoms of others.

**Right to object:**

**You have the right to object, on grounds relating to Your particular situation, at any time to processing of personal data concerning you for the purposes of legitimate interests. The Data Controller will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.**

**Where the processing of personal data serves direct marketing purposes You are entitled to object to the processing of personal data regarding you for such purposes, including profiling, in so far as the latter relates to direct marketing. In case You object to the processing of personal data with the aim of direct marketing, then the personal data can no longer be processed for this purpose.**

**Framework for the exercise of rights:**

The Data Controller will respond without unreasonable delay and by no means later than within one month of receipt to the request of You whereby You exercise Your rights about the measures taken upon such request. This period may be, if needed, extended by further two months in the light of the complexity of the request and the number of requests to be processed. The Data Controller notifies You about the extension also indicating its grounds within one month of the receipt of the request. In case the Data Controller does not take any measure upon the request, it shall so notify You without delay but by no means later than in one month stating why no measures are taken and about the opportunity of You to lodge a complaint with the data protection authority (In Hungary, the competent supervisory authority is the Hungarian Authority for data Protection and Freedom of Information "NAIH" (<http://naih.hu/>; H-1530 Budapest, Pf.: 5; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) and to file an action with the courts for remedy.

In case of violation of Your rights You may be appealed to a court. It belongs to the jurisdiction of the General Court. The case may be initiated before the tribunal of the domicile or place of residence of the person concerned, according to his/her choice. The court may oblige the Data Controller to provide information, correct, limit or delete the data, or annul the automated decision-making processing, to take into account Your right to object. The court may order disclosure of its judgment in such a way that the Data Controller or any other data controller and the infringement committed by it may be identified.

You may request compensation of damages incurred in connection with unauthorized data processing (including omission take data security measures) from the Data Controller responsible for the damage. If the Data Controller breaches Your personality right by unauthorized data processing or violation of requirements of data security, you may demand a tort from the Data Controller. The Data Controller is exempt from liability if it proves that the damage or prejudice to the person's personality right is caused by an unavoidable cause outside the scope of the data processing.

No compensation is required and no damages can be claimed in so far as it is due to the intentional or gross negligence of the injured party.