

## **Information on Data Processing MÁVDIREKT**

### **1. Name of controller:**

Name: MÁV-START Railway Private Limited Company  
Registered seat: 1087 Budapest, Könyves Kálmán krt. 54-60  
Company registration number: 01-10-045551  
Court of registration: Court of Registration of the Metropolitan Court  
Tax identification number: 13834492-2-44  
Email: informacio@mav-start.hu

### **2. Purpose, legal grounds and mode of data processing, scope of data processed and duration of storage, data subjects**

**Purpose of data processing:** providing a service via MÁVDIREKT, i.e. information on passenger services, processing complaints made verbally, remarks, VIP seat reservations, requests for special services.

**Scope of data processed:** name, mother's maiden name, place of birth, date of birth, contact details (telephone number), route, time of travel, grounds of the complaint, remark, time of the call, text messages, recordings; furthermore, in the case of VIP seat reservations: card number, time of travel, telephone number and route; in the case of processing requests for special services: contact details (email address), wheelchair data (type /motorised, not motorised, is it foldable/, length, width, weight,), can the passenger get out of the wheelchair, is the passenger able to use the toilet.

**Legal grounds of data processing:** satisfying legal obligations based on GDPR Article (1)c) and Section 17/B(3) of Act CLV of 2007 on consumer protection. Furthermore, in the case of special personal data processing during the course of the processing of request for special services: consent of the data subject based on GDPR Article 9(2)a) and in the case of VIP seat reservations: consent as defined under GDPR Article 6(1)a).

**Duration of data processing:** 5 years of the time the recording was made in the case of recordings, 5 years of the generation of the data in the case of other personal data.

**Mode of data processing:** on paper and electronically

**Source of the personal data:** data subject.

### **3. Information on use of a data processor:**

Based on the service agreement: **MÁV Services Private Limited Company**  
Registered seat: 1087 Budapest, Könyves Kálmán krt. 54-60  
Company registration number: 01-10-045838  
Court of registration: Court of Registration of the Metropolitan Court  
Tax identification number: 14130179-2-44  
Email: helpdesk@mav-szk.hu

Place of data storage: 1012 Budapest, Krisztina krt. 37/A

The processor processes the data processed according to section 2 and provides full-scope IT services based on the agreement concluded with the processor, which includes the operation of communication applications.

Based on the agreement: **Care All Trade and Services Limited Liability Company**

Registered seat: 1121, Törökbálint út 15, A. ép. fszt.

Company registration number: 01-09-727414

Court of registration: Court of Registration of the Metropolitan Court

Tax identification number: 13284567-2-43

The processor processes the data processed according to section 2 for the duration specified under section 2 and operates the ANDOC system used to store personal data generated during the course of ordering special services.

Name: **MÁV Magyar Államvasutak (Hungarian State Railways) Private Limited Company**

Registered seat: 1087 Budapest, Könyves Kálmán krt. 54-60

Company registration number: 01-10-042272

Court of registration: Court of Registration of the Metropolitan Court

Tax identification number: 10856417-2-44

The processor processes the recordings made of telephone calls recorded in connection with claim recovery, as well as the data processed according to section 2.

The processor may transfer the personal data of the data subject to a third country, about which it informs the data subject in advance.

#### **4. Persons authorised access to the data:**

Customer service and claims recovery employees of MÁV-START Ltd. and employees involved in organising the travel of persons with disabilities.

#### **5. Information on data protection measures**

##### **Mode of data storage, data processing security:**

- The processor, in collaboration with the processor MÁV Szolgáltató Központ (Service Centre) Ltd., takes the technical and coordination measures

- a) necessary for the application(s) to function in compliance with the IT security guideline;
- b) to ensure that authorised users access the functions and the data according to their level of access;
- c) required to save and archive the data;

furthermore, complies with procedural ruled necessary to satisfy requirements set forth in the data protection legal regulations referred to under section 7. The data processor runs a virus scan and other security scans on the data by way of MÁV Services Centre Ltd.

- the IT components of the system are located in the server room of the processor MÁV Services Centre Ltd. (1012 Budapest, Krisztina krt. 37.).

- takes coordination and organisational measures to protect the data that offers adequate protection against processing-related risks, selects and operates the IT equipment used in a manner that the data processed:

- a) is accessible to authorised users (standby);
- b) is authentic and certified (data authenticity);
- c) is certifiable in terms of its integrity (data integrity);
- d) is only accessible to the authorised user and is protected against unauthorised access (data confidentiality).

## **6. Rights of data subjects and opportunities for enforcement**

### **6.1. Right to request information**

You may request information via the contact you provided under section 1 from the data processor in connection with the purpose of data processing, its legal grounds, duration, the name, address (registered seat) of the controller, the name, address (registered seat) of the processor, the activity related data to processing, the contact details of the data protection officer, as well as who and for what purpose receives or received your personal data and your rights in connection with data processing. The processor provides easy-to-understand information in writing within the shortest possible space of time following the submission of the request or maximum within 1 month. This deadline may be extended by two months, if necessary, based on the complexity of the request and the number of requests made. The processor may order payment or refuse to take the measure based on the request, if the request for information is unfounded or, particularly owing to its repetitive character, exaggerated.

### **6.2. Right to withdraw consent**

In the event of your consent based on GDPR Article 6(1)a) and Article 9(2)a), you may withdraw your consent to data processing in writing at any given time via the contact you provided under section 1, which does not affect the legality of data processing carried out based on consent prior to withdrawal.

### **6.3. Right of access**

You may receive feedback on whether the processing of your personal data is in progress from the processor.

Based on right of access, you are authorised access to the personal data in connection with which data processing is in progress and the following information:

- the purpose of data processing,
- the categories of the personal data concerned,
- the duration of data processing,
- who and for what purpose receives or received your personal data,
- your rights in connection with data processing,
- the right to lodge a complaint addressed to the supervisory authority.

The processor shall, if it does not have a detrimental effect on the rights and liberties of others, issue the copy of the personal data constituting the subject-matter of data processing at your request. The processor requests payment for the additional copies you requested.

#### **6.4. Right to rectification (correction) and erasure**

You may request the rectification (correction) of your inaccurately recorded personal data or the amendment of missing personal data in writing via the contact you provided under section 1.

You may request the erasure of your personal data in writing via the contact you provided under section 1, if data processing no longer has any purpose, if the processing of this data is unlawful, if the deadline set for the storage of the data has expired or if ordered by the court or authority.

The processor shall notify you of correction and erasure, as well as all those that previously transferred the data for the purpose of processing. A notice is not sent if it does not violate your rightful interest, in light of the purpose of the data processing.

The processor does not erase personal data, if the data is necessary to satisfy legal obligations applicable to the processor or to file, enforce and protect claims.

#### **6.5. Restriction of processing**

You may request the processor to restrict the processing of your personal data in writing via the contact you provided under section 1, if

- you dispute the accuracy of the personal data (in which case the restriction applies for the duration until the processor verifies the accuracy of the data);
- data processing is unlawful, but you object to the erasure of the data and request the restricted use of the data;
- the purpose of data processing is no longer relevant, but you need the data to file, enforce or protect claims.

The restriction shall last until it is necessary based on the reason you stated. In this case, with the exception of storage, we only process personal data based on your consent, or to file, enforce and protect claims, or to protect the rights of other natural or legal persons, or for important public interests. The processor shall inform you in advance of lifting the restriction at your request.

#### **6.6. Opportunities for legal remedy**

You may lodge a complaint to the Hungarian Authority for Data Protection and Freedom of Information if your rights have been violated or you disagree with the decision rendered by the processor.

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian Authority for Data Protection and Freedom of Information)

Registered seat/Postal address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c / 1530  
Budapest, Pf. 5  
Tel.: (+36-1) 391-1400  
Fax: (+36-1) 391-1410  
Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

You may also directly file an appeal against the processor at the court competent in the registered seat of the processor or place of residence of habitual address within 30 days of its communication, if your rights have been violated or you disagree with the decision rendered by the processor. The court shall hear the case in an expedited proceeding.

You may request information via the contact you provided under section 1, should you need further information in addition to the information provided in the data protection notice.

Write to the email address [adatvedelem@mav-start.hu](mailto:adatvedelem@mav-start.hu) if you have any remarks or complaints in connection with the processing of your personal data or wish to request information on the processing of your personal data.

## 7. Relevant legal regulations:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- Act CXII of 2011 on right of informational self-determination and freedom of information (Freedom of Information Act)
- Act V of 2013 on the Civil Code (CC)
- Act CLV of 2007 on consumer protection (Consumer Protection Act)



### TECHNICAL TRANSLATION

Prepared by the Hungarian Office  
for Translation and Attestation Ltd.

This translation shall in no way replace attested  
translation.

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