

Privacy Policy on data processing related to the fulfillment of requests for data of public interest submitted to MÁV-START Zrt.

1. The identity and contact details of the data controller

Name: MÁV-START Railway Passenger Transport Co.
Headquarters: 1087 Budapest, Könyves Kálmán krt. 54-60.
Company reg. no.: 01-10-045551
E-mail: kozadat@mav-start.hu
hereinafter: Data Controller.

Contact details of the Data Protection Officer:

E-mail: adatvedelem@mav-start.hu
Postal address: 1087 Budapest, Könyves Kálmán krt. 54-60. – please mark the following on the envelope: "To the Data Protection Officer".

2. The Data processor's name and contact informations

Name: MÁV Szolgáltató Központ Zrt.
Headquarters: 1087 Budapest, Könyves Kálmán körút 54-60.
Company reg. no.: 01-10-045838
E-mail: helpdesk@mav-szk.hu
hereinafter: Data Processor.

The Data Processor provides an IT service based on the contract with the Data Controller, which includes the operation of certain communication applications (email system, DMS system for filing requests) and the server service required to store personal data.

3. The data subject: all natural persons who submit a request (hereinafter: request) to the Data Controller in order to provide data of public interest managed by the Data Controller (hereinafter: data subject).

4. Information on data processing

4.1. Purpose of the data processing: processing of personal data is necessary for the fulfillment of requests, identification of requests from the same data requester within a year in the same subject area, determination of possible reimbursement and documentation of their fulfillment, as well as about rejected or partially rejected requests in accordance with § 30 (3) of the Act CXII of 2011, and keeping records of the reasons for rejecting rejected applications.

4.2. Legal basis of the data processing: Article 6(1) point e) of the GDPR, data processing is necessary for the performance of a task carried out in the public interest by the Data Controller, which is defined in § 26(1), § 29(1), § 29(1b) and § 30(3) of the Act CXII.

4.3. Categories of personal data: name, notification address (postal address/e-mail address), data scope of the submitted request, and information on whether the Data Controller rejected the data request, if so, with what reason, the file number of the data request. For reimbursement of costs established for fulfilling the data request: name/designation, address/headquarters, tax identification number/tax number, bank account number.

4.4. Duration of data processing: based on § 28(2) and § 29(1a) of the Act CXII of 2011, the Data Controller processes the data of the requests received for 1 year from the date of their submission. If the Data Controller determines reimbursement for the fulfillment of the request, the personal data processed in this context shall be stored for 8 years from the date of data collection in accordance with § 169(1)-(2) of Act C of 2000 on accounting.

4.5. Source of personal data: the personal data processed may only come to the attention of the Company from the data requester.

4.6. Recipients of personal data and categories of recipients:

The person acting under the direct control of the Data Controller and having access to personal data processes the personal data exclusively for the purpose of performing tasks related to the operation of the Data Controller.

In the event of a court proceeding or an official investigation, the personal data provided by the data requester will be forwarded in accordance with the applicable laws if they are necessary for the conduct of the procedure or investigation.

The personal data will not be forwarded to third countries or international organizations.

5. The rights of the data subject and the manner of their exercise

The data subject can primarily exercise his/her rights in the application submitted through the contact details indicated in point 1 of the Data Controller. We inform the data subject that he/she can submit his/her request for the exercise of the data subject's right to any of the Data Controller's contact details, but we recommend that he/she do so through one of the contact details indicated in point 1.

The Data Controller shall provide the information in writing, in an understandable form, as soon as possible after the submission of the request, but no later than one month. If necessary, taking into account the complexity of the application and the number of applications, this deadline can be extended by another two months. The data controller shall inform the data subject of the extension of the deadline, indicating the reasons for the delay, within one month of receiving the request. The Data Controller primarily fulfills the data subject's request in the form requested by the data subject. If the data subject submitted the request electronically, the Data Controller will provide the answer electronically, unless otherwise requested by the data subject.

The Data Controller ensures the exercise of data subject rights free of charge for the data subject. If the data subject's request is clearly unfounded or – especially due to its repetitive nature – excessive, the Data Controller may, taking into account the administrative costs associated with providing the requested information or information or taking the requested measure, charge a reasonable fee or refuse to take action based on the request. The Data Controller may refuse to fulfill a request to exercise its data subject rights until it cannot identify the data subject beyond any doubt.

5.1. The right of access and the right to request a copy

The data subject is entitled to receive feedback from the Data Controller as to whether their personal data is being processed. Based on the right of access, the data subject is entitled to receive access to the personal data related to the ongoing data processing about the following information: the purpose of the data processing, the categories of personal data, the duration of the data processing, who and for what purpose receive or have received the personal data of the data subject, his or her rights related to data processing, and the right to submit a complaint to the supervisory authority.

Based on the request of the data subject, the Data Controller provides a copy of the processed personal data if it does not adversely affect the rights and freedoms of others. The Data Controller provides a copy of the personal data to the data subject free of charge for the first time, and may charge a fee for each additional copy.

5.2. The right to modify, correct and supplement data

The data subject can request the modification (correction) of inaccurate personal data relating to him/her or the addition of incomplete personal data via the contact information given in point 1. The data controller will notify the data subject of the correction.

5.3. The right to erasure ('right to be forgotten')

The data subject may request the deletion of his/her personal data if the purpose of the data processing has ceased, if the data subject withdraws his/her consent, if the data processing is unlawful, if the specified time limit for data storage has expired, and if it has been ordered by a court or authority. The Data Controller will notify the data subject of the deletion of personal data. The Data Controller does not delete personal data if it is necessary to fulfill the legal obligations (e.g. with regard to the retention period prescribed by the Consumer Protection Act and the Accounting Act) of the Data Controller, as well as to present, enforce and defend legal claims.

5.4. Limitation of data processing

The data subject may request that the processing of his/her personal data be restricted by the Data Controller at any contact point of the Data Controller if:

- disputes the accuracy of the personal data (in this case, the limitation applies to the period until the Data Controller checks the correctness of the data);
- the data processing is illegal, but the data subject opposes the deletion of the data and requests the restriction of their use;
the purpose of the data processing has ceased, but the data subject needs them to present, enforce and defend legal claims.

The limitation of data processing lasts as long as the reason specified by the data subject makes it necessary. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's 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 the data subject in advance of the lifting of the restriction at the request of the data subject.

5.5. Right to object

The data subject has the right to object at any time to the processing of his personal data based on points e) and f) of Article 6 (1) of the GDPR for reasons related to his own situation. This right can be exercised in the case of data processing indicated in point 3.4. and 3.6. of this Privacy Policy. In this case, the Data Controller will not process the personal data unless the controller 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. If the data subject objects to the data processing contained in this Privacy Policy, the Data Controller will individually examine the feasibility of the request.

5.6. Remedies (Right to appeal)

5.6.1. The right to contact the Data Controller

If the data subject has comments or objections regarding the processing of his personal data, or would like to request information about the processing of his/her data, he/she can do so in an e-mail written to adatvedelem@mav-start.hu. If the data subject would like to find out more about the rights, please visit the website <https://www.mavcsoport.hu/en/mav-start/introduction/rights-data-subject-and-their-enforcement>.

5.6.2. Right to complain

If the data subject does not agree with the data processing carried out by the Data Controller or believes that the data controller has violated one of his rights, he can lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information at any of the following contact details:

Name: Hungarian National Authority for Data Protection and Freedom of Information
Headquarters: 1055 Budapest, Falk Miksa utca 9-11.
Postal address: 1363 Budapest, Pf. 9.
Phone no.: +36 (1) 391-1400 / +36 (30) 683-5969 / +36 (30) 549-6838
Fax no.: +36 (1) 391-1410
E-mail: ugyfelszolgalat@naih.hu
Website: www.naih.hu

5.6.3. Right to a judicial remedy

If the data subject does not agree with the data processing carried out by the Data Controller or believes that the data controller has violated one of his rights, the data subject may apply directly to the Data Controller for legal redress, which request must be submitted to the court at the Data Controller's registered office or the data subject's place of residence. submit. The court acts out of sequence in the case.

6. Legislation applied and referred to during above-mentioned data processing

- Regulation (EU) 2016/679 of the European Parliament and of the Council 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 / GDPR);
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information;
- Act C of 2000 on accounting;
- Act LXIII of 2012 on the recycling of public data;
- No. 301/2016 (IX. 30.) Government decree on the amount of compensation that can be established for the fulfillment of a request for data of public interest.

**MÁV-START Zrt.
Data Controller**