

**Privacy Policy on data processing in connection  
with the questionnaire published by MÁV-START Zrt.**

**1. The Data controller's name and contact informations**

Name: MÁV-START Railway Passenger Transport Co.  
Headquarters: 1087 Budapest, Könyves Kálmán krt. 54-60.  
Company reg. no.: 01-10-045551  
E-mail: eszrevetel@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 Zártkörűen Működő Részvénytársaság  
Headquarters: 1087 Budapest, Könyves Kálmán körút 54-60.  
Company reg. no.: 01-10-045838  
E-mail: helpdesk@mav-szk.hu  
hereinafter: Data Processor

Based on the service contract between the Data Processor and the Data Controller, it provides IT services, which also includes the operation of the interface used to fill out the questionnaire according to point 4 of this Privacy Policy.

**3. The data subject:** all natural persons who fill out the questionnaire published by the Data Controller are considered data subjects (hereinafter: data subject).

**4. Information on individual data processing**

*Brief description of data processing:* the Data Controller announces the possibility for passengers traveling on ADRIA IC to fill out a questionnaire, in which they want to measure their satisfaction with the services provided to their passengers and use the experiences and feedback to improve the services. Filling in the questionnaire is basically anonymous, however, in order to ensure that a passenger fills out the questionnaire only once, the website used to display the questionnaire uses cookies, in which the data indicated below are stored.

*The purpose of data processing:* to ensure that only one person can fill out the questionnaire from one device, thus ensuring that the completed questionnaires really give a true picture of the opinions of the traveling public.

*Personal data processed to achieve the purpose of data processing:* the cookie used stores the questionnaire ID and the ID of the completion.

*The legal basis of the data processing:* according to Article 6 (1) point f) of the GDPR, the legitimate interest of the data controller, which manifests itself in the fact that there is a business interest in the fact that the questionnaire can be filled out once from one device, as this is the only way to ensure that the questionnaire gives a true picture about the service, as it can inform decisions about the development of the service. In the event that a person concerned has to fill out the questionnaire more than once, the results of the questionnaire could not be used as a basis for decisions related to service development.

*The duration of the data processing:* the cookie is valid for 30 days after being placed in the browser used to open the questionnaire, after which it is deleted.

## **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 may establish reimbursement for additional copies requested by the data subject.

### ***5.2. The right to modify, correct and supplement data***

The right to modify, correct and supplement data cannot be interpreted in connection with cookie management, so the Data Controller cannot fulfill the data subject's request in this regard.

### ***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 of the Data Controller, as well as to present, enforce and defend legal claims.

You can delete cookies in the corresponding menu item of your browser, you can find more help for this in your browser's help. If required, cookies must be deleted on all browsers used by the data subject. You can get detailed information about deleting and blocking cookies, depending on the browser used by the person concerned, at the following links (click on the text section from which you visited our website):

- [Firefox](#)
- [Google Chrome](#)
- [Microsoft Internet Explorer 11](#)
- [Microsoft Edge](#)

Please note that after deleting functional cookies, certain functions of the website will not work or will only work to a limited extent. When using an ad-blocker, the information is not displayed in all cases. If the person concerned wants to view it, it is necessary to deactivate the ad blocking application.

#### ***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 point (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](mailto: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](mailto:ugyfelszolgalat@naih.hu)  
Website: [www.naih.hu](http://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 or GDPR);
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information.

**MÁV-START Zrt.**  
**Data Controller**