



**MÁV-START RAILWAY PASSENGER TRANSPORT CO.**

1087 Budapest, Könyves Kálmán krt. 54-60.

Website: [www.mavcsoport.hu](http://www.mavcsoport.hu)

**Privacy Policy on data processing by MÁV-START Co. in online ticketing system  
(applicable from 1<sup>th</sup> of March 2024)**

The purpose of this Privacy Policy is for MÁV-START Railway Passenger Co. to provide information about data processing carried out in connection with online ticket sales in its systems operated for online ticket sales, such as the [www.jegy.mav.hu](http://www.jegy.mav.hu) website and the MÁV application in accordance with Article 13 of the General Data Protection Regulation of the European Union (hereinafter: GDPR).

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

Name: MÁV-START Railway Passenger Transport Co.  
Headquarters: 1087 Budapest, Könyves Kálmán krt. 54-60.  
Co.reg.no.: 01-10-045551  
VAT number: 13834492-2-44  
E-mail: [eszrevetel@mav-start.hu](mailto:eszrevetel@mav-start.hu)  
hereinafter: Data controller

*Contact details of the Data Protection Officer:*

E-mail: [adatvedelem@mav-start.hu](mailto:adatvedelem@mav-start.hu)

Postal adress: 1087 Budapest, Könyves Kálmán krt. 54-60. – Please indicate on the envelope the following: „for the Data Protection Officer”.

If the data subject purchases a domestic or international ticket in its online ticketing systems operated by the Data Controller, which entitles him or her to use the services of service provider(s) other than the Data Controller, the Data Controller qualifies as an independent data controller only in respect of the sales activity and any related data processing. With regard to other data processing related to the provision of services (e.g. checking the validity of tickets), the Data Controller does not determine the purpose of data processing independently, but performs it in the interest of the service provider(s) providing the service (e.g. data transfer), so in this regard it qualifies as a data processor.

If the data subject purchases a domestic or international ticket/pass in its online ticketing systems operated by the Data Controller, which entitles him or her to use the services of other service provider(s) in addition to the Data Controller, the service providers participating in the provision of services shall be considered joint data controllers. In such cases, the data subject may submit a request to exercise his or her right to exercise the right of data subject to any controller involved in the provision of services.

**2. The Data processor's name and contact informations**

Name: MÁV Szolgáltató Központ Co.  
Headquarters: 1087 Budapest, Könyves Kálmán körút 54-60.  
Co.reg.no.: 01-10-045838  
VAT number: 14130179-2-44  
E-mail: [helpdesk@mav-szk.hu](mailto:helpdesk@mav-szk.hu)  
hereinafter: Data processor.

Based on the service contract concluded between the Data Controller and the Data Processor, the Data Processor provides IT services to the Data Controller, which includes the operation and development of the website ([www.jegy.mav.hu](http://www.jegy.mav.hu)) used for ticket sales and the MÁV application, as well as the hosting service necessary for storing data, as well as the processing and analysis of electronically stored data in accordance with the Data Controller's instructions.

### 3. Information on individual data processing

#### 3.1. Registration on the online ticketing interface (the „[jegy.mav.hu](http://jegy.mav.hu) website and the „MÁV application”)

<b>The data subject</b>	All person who registers on the <a href="http://jegy.mav.hu">jegy.mav.hu</a> website and/or in the MÁV application and creates user profile / user account.
<b>Purpose of the data processing</b>	Registration in the system operated by the Data Controller for online ticket sales ("jegy.mav.hu" or the "MÁV application") for the purpose of creating a user account, including confirmation of the creation of a user account, in which the user has the opportunity to save the personal data necessary for ticket purchase in order to facilitate (expedite) the subsequent ticket purchase.
<b>The legal basis of the data processing</b>	Consent of the data subject (the user) [Article 6 (1) (a) of the GDPR].
<b>Personal data processed to achieve the purpose of data processing</b>	a) creat a user account, including confirmation of the creation of a user account: e-mail address, full name (first and last name), password. b) billing data (not mandatory for registration, but a condition for successful purchase; can be modified or deleted at any time in the profile): billing name, billing address (country, postal code, city, name and type of public space, house number, floor/door).
<b>Duration of the data processing</b>	Until the consent is withdrawn (until the user profile is deleted).

#### 3.2. Purchase of tickets with or without registration

<b>The data subject</b>	all person, who purchases a ticket after registration on the <a href="http://jegy.mav.hu">jegy.mav.hu</a> website and/or in the MÁV application through the user profile or without registration.
<b>Purpose of the data processing</b>	Ensuring the purchase of a name-specific ticket entitling to use the Data Controller's services – providing a personalised travel entitlement – and sending the ticket electronically to the customer, as well as excluding and preventing misuse of tickets.

<b>The legal basis of the data processing</b>	Performance of the contract concluded between the Data Controller and the data subject for the provision and use of passenger transport services pursuant to Article 6 (1) (b) of the GDPR.	
<b>Personal data processed to achieve the purpose of data processing</b>	<b><i>Processed personal data</i></b>	<b><i>Purpose of personal data processing</i></b>
	Full name and date of birth of data subject	Issuing a name-specific e-ticket
	E-mail address of data subject	Sending the e-ticket electronically
	Date of birth of data subject	Automatic provision of any discounts due to travel based on the age of the data subject
	Amount and title of the discount	Granting travel facilities to passengers
	Data of the travel route or, in the case of a ticket with territorial validity, the area of validity	Proper issuance of the e-ticket
	Discount card number	To prevent unauthorised use of the discounted ticket
	Billing data [billing name and billing address (country, postal code, city, name and type of public space, house number, floor/door)]	For the purpose of issuing an invoice when purchasing an e-ticket;
	Ticket data in the barcode on the ticket (data visually displayed on the ticket according to the status at the time of purchase)	Prevent misuse of the e-ticket.
	Passenger's facial image (photo) and ID number(s) – only when purchasing a season ticket.	Issuing an electronic pass card and checking eligibility for travel
<b>Duration of the data processing</b>	In the case of the ticket, it lasts until the journey is used	
<b>Recipient</b>	OTP Mobil Szolgáltató Kft. (registered office: 1143 Budapest, Hungária krt. 17-19., company registration number: 01-09-174466, contact: <a href="mailto:ugyfelszolgalat@simple.hu">ugyfelszolgalat@simple.hu</a> ). The purpose of data transmission: payment of the price of the ticket purchased electronically, strong customer authentication, fraud analysis and customer information. Legal basis for data transfer: pursuant to Article 6 (1) (b) of the GDPR, performance of the contract concluded between the Data Controller and the data subject, as well as compliance with the data reporting obligation required under the PSD2 Directive and the SCA Regulation.	

**3.2.1. Data processing within the purpose of data processing for a purpose other than the original purpose (contact, sending information related to travel)**

<b>The data subject</b>	All person who has purchased a ticket and, in the case of a ticket with territorial validity, an emergency event occurs affecting the travel route or, in the case of a ticket with territorial validity, the area of validity.
<b>Purpose of the data processing</b>	Informing the passenger directly, electronically (by e-mail) of information concerning the travel route or area of validity (delay, cancellation, cancellation, other emergency events).
<b>The legal basis of the data processing</b>	Performance of the contract concluded between the Data Controller and the data subject for the provision and use of passenger transport services pursuant to Article 6 (1) (b) of the GDPR, according to which the Data Controller must fulfil its obligation to provide information related to the service.
<b>Personal data processed to achieve the purpose of data processing</b>	The travel route or, in the case of a ticket with territorial validity, the area of validity and the e-mail address of the passenger purchasing a ticket for this route/area.
<b>Duration of the data processing</b>	Until an information message is sent to the passenger.

**3.3. Verification of entitlement to passenger transport services**

<b>The data subject</b>	All person who travels with a ticket purchased from the Data Controller and the entitlement to travel, including the verification of the entitlement to the discount and the right to travel linked to a person, is checked by the authorized person(s) acting on behalf of the Data Controller.
<b>Purpose of the data processing</b>	Checking the legality of using the transport service on production of a ticket or other document entitling them to travel or, in the case of discounts, of a document entitling them to the discount or any other document. During the verification, the ticket inspector acting on behalf of the Data Controller views the ticket during the identity check and scans the barcode (QR code) on the ticket with its device provided for this purpose, based on which the device used by him provides information about the ticket data (validity, route/area, discount, personalisation, etc.) at the time of purchase, which the ticket inspector compares with the data indicated on the ticket. In addition, if the right to travel is personal, the ticket inspector also requests the presentation of an identification document in order to establish identity, by consulting which he or she has the opportunity to compare the name, date of birth and ID number(s) on the verification device or ticket with the data on the card, and, based on the photograph on the card, determine whether the identity document is indeed the passenger's identity document, so that the ticket is actually used by the authorised person for the journey. During the ticket check, if the data subject applies any discount during his/her journey, the ticket inspector also looks at the document, ID card or certificate entitling him or her to the discount in order to verify eligibility for the discount.

<b>The legal basis of the data processing</b>	a) performance of the contract concluded between the Data Controller and the data subject for the provision and use of passenger transport services pursuant to Article 6 (1) (b) of the GDPR. b) if, during the trip, the data subject uses a discount that also requires the processing of the data subject's health data (e.g. discount for persons with disabilities or military personnel), the lawfulness of the processing of sensitive data is supported by Article 9 (2) (f) of the GDPR, according to which data processing is necessary for establishing and enforcing the data subject's legal claim – entitlement to a discount related to travel.
<b>Personal data processed to achieve the purpose of data processing</b>	The ticket data on the ticket and the passenger's personal data (passenger's name, date of birth, ID number in case of season ticket, and title of the discount in case of discount) and name, date of birth, ID number and image (photo) on the document identifying the passenger.
<b>Duration of the data processing</b>	a) Data processing takes place primarily until the ticket is checked. b) The electronic log file of the e-ticket verification shall be kept for 5 years after the ticket has been verified.

### 3.3.1. Transmission of data related to monitoring

<b>Recipient of the transfer and scope of personal data transferred</b>	If the ticket sold by the Data Controller entitles the use of one or more services provided individually or jointly by a service provider other than the Data Controller, or services provided jointly by the Data Controller and one or more service providers, and the verification is carried out by service provider(s) other than the Data Controller, the following personal data will be transmitted for this purpose, depending on the technical method of ticket control: <ul style="list-style-type: none"> <li>a) in case of scanning the barcode and decrypting the data contained in the code: name and date of birth of the passenger, route of travel/area of validity of the ticket, information on travel discounts, validity of the ticket, other services purchased;</li> <li>b) by scanning the barcode in case of request by the external service provider to the Data Controller's database: name and date of birth of the passenger, route of travel/scope of the ticket, information on travel discounts, validity of the ticket, other services purchased</li> </ul>
<b>Purpose of data transfer</b>	Verification of the validity of a ticket entitling the use of passenger transport services and thus of the entitlement to travel
<b>Legal basis of data transfer</b>	Performance of a contract concluded pursuant to Article 6 (1) (b) of the GDPR between the Data Controller and the other service provider(s) involved in the provision of services and the data subject for the provision and use of passenger transport services.

**3.4. Issuing an invoice for ticket purchase and keeping the invoice**

<b>The data subject</b>	All person who purchases a ticket on any interface of the Data Controller used for online ticket sales.
<b>Purpose of the data processing</b>	Issuing and keeping in accordance with law the invoice for the payment of the service provided by the Data Controller, if applicable, a document treated as a corrective invoice.
<b>The legal basis of the data processing</b>	Compliance with a legal obligation pursuant to Article 6 (1) (c) of the GDPR, which is defined in Sections 169-170 of Act CXXVII of 2007 on Value Added Tax.
<b>Personal data processed to achieve the purpose of data processing</b>	Billing name, billing address (country, postal code, city, name and nature of public space, house number, floor/door), invoice data.
<b>Duration of the data processing</b>	Pursuant to Section 169 (2) of Act C of 2000 on Accounting, 8 years from the publication of the annual financial statements, and if Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: PMT) Pursuant to Section 58 (1), the supervisory body specified in Section 5, the Financial Intelligence Unit, the investigating authority, the prosecutor's office and the court shall retain it for the period specified in the request, up to ten years from the termination of the business relationship or the execution of the transaction order.
<b>Recipient</b>	the Hungarian tax authority (National Tax and Customs Administration). Purpose of data transfer: fulfillment of statutory data reporting obligation. Legal basis for data transfer: compliance with a legal obligation pursuant to Article 6 (1) (c) of the GDPR, which was carried out by Act CXXVII of 2007 and Act 23/2014 (VI.30.) NGM Regulation.

**3.5. Data processing for purposes other than those indicated in points 3.2 and 3.3 (preparation of statistical data)**

<b>The data subject</b>	Persons identified as data subject under points 3.2 and 3.3, including point 3.3.1.
<b>Purpose of the data processing</b>	<p>a) personal data processed by the Data Controller specifically in connection with ticket sales and/or ticket control may be used – according to various aspects – to generate statistical data, which may serve to base decisions related to the Data Controller's sales activities or the provision of services, or to measure the consequences of previous decisions.</p> <p>b) In addition, considering that the Company qualifies as an organization performing a public task, if the Data Controller receives a request for the release of data of public interest, the fulfillment of which can be achieved by preparing statistical data from personal data processed in connection with ticketing and/or ticket control activities, Infotv. may also use personal data relating to the data subject for this purpose. In all cases, statistical data are prepared in such a way that the data subject can no longer be identified afterwards.</p>



<b>The legal basis of the data processing</b>	<p>a) pursuant to Article 6 (1) (f) of the GDPR, the legitimate interest of the Data Controller, which manifests itself in the fact that the Data Controller has a legitimate interest in preparing statistical data from the personal data processed in the course of its ticketing and ticket control activities, which facilitates and bases decisions related to the development of its sales and control activities and the provision of services.</p> <p>b) if the preparation of statistical data is necessary because it also qualifies as data of public interest and its release is carried out by Infotv. , the legal basis for data processing is the performance of the public task of the controller pursuant to Article 6 (1) (e) of the GDPR.</p>
<b>Personal data processed to achieve the purpose of data processing</b>	<p>Personal data processed in connection with ticket sales and ticket control, from which the data subject cannot be directly identified.</p> <p>The Data Controller does not perform profiling, so the analysis of personal data is not individualized!</p>
<b>Duration of the data processing</b>	<p>The Data Controller processes the personal data until the statistical data is prepared, after which the data subject cannot be identified either directly or indirectly from the statistical data.</p>

### 3.6. Operation of the monitoring system related to online ticketing

<b>The data subject</b>	<p>All person who purchases a ticket on any interface of the Data Controller used for online ticket sales.</p>
<b>Purpose of the data processing</b>	<p>The sales and billing data generated during the sale by the Data Controller, recording any errors in a log file for the purpose of monitoring and analysing the errors and eliminating the detected errors, as well as if a claim is asserted by the data subject for any reason, the assessment of the claim.</p>
<b>The legal basis of the data processing</b>	<p>Pursuant to Article 6 (1) (f) of the GDPR, data processing is necessary for the enforcement of the legitimate interest pursued by the Data Controller. The Data Controller has a legitimate interest in ensuring the smooth operation of its sales system, in particular in order to collect the fares set out in the Public Service Contract more efficiently, to monitor the errors that arise, to determine and carry out the measures necessary to eliminate the errors, and to properly and accurately investigate complaints sent to the Data Controller concerning the service.</p>
<b>Personal data processed to achieve the purpose of data processing</b>	<p>E-mail address used when logging in, notification e-mail address provided for purchases without registration, activities and times performed in the online ticketing system during purchase, IP address of the connected device.</p>
<b>Duration of the data processing</b>	<p>If the Online Ticket Purchase System works flawlessly or in the absence of customer comments on the given transaction, they will be automatically deleted within a maximum of 15 days from the date of purchase. In case of receipt of an error or complaint or comment related to a specific transaction,</p>

	the monitoring data shall be stored by the monitoring system until the observation or complaint is investigated or the error is corrected.
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### ***3.7. Other data processing related to online ticket sales***

The following data processing are closely related to online ticket sales performed by the Data Controller and to the Data Controller's service, in respect of which the Data Controller independently fulfils the information pursuant to Article 13 of the GDPR. Certain data management notices of the Data Controller are available on the <https://www.mavcsoport.hu/mav-start/bemutakozas/adatkezelesi-tajekoztatok> website (Data protection/Privacy notices menu item).

- Data processing carried out by the Customer Service of MÁV-START Co. in connection with written complaint handling and the assessment and fulfilment of refund/compensation claims;
- Data processing by the Customer Service of MÁV-START Co. during the operation of the telephone complaint system (MÁVDIREKT);
- Data processing carried out by MÁV-START Co. in connection with the management and enforcement of claims against passengers who do not pay the transfer fee or otherwise violate the travel conditions.

## **4. Data subjects' rights and how to exercise them**

In particular, the data subject may exercise his or her data subject rights in a request submitted through the contact details of the Data Controller indicated in Section 1. We inform the data subject that the Data Controller may submit a request to exercise the right of the data subject at any of his contact details, however, we recommend that he or she do so via one of the contact details indicated in Section 1.

The Data Controller shall provide the information in writing, in an easily understandable form, within the shortest possible time from the submission of the request, but not later than within one month. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The controller shall inform the data subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay. The Data Controller shall primarily comply with the request of the data subject in the form requested by the data subject. If the data subject submitted the request electronically, the Data Controller shall provide the answer electronically, unless otherwise requested by the data subject.

The Data Controller shall ensure the exercise of the rights of the data subject free of charge. Where the request of the data subject is manifestly unfounded or excessive, in particular because of its repetitive character, the Data Controller may, taking into account the administrative costs involved in providing the requested information or communication or taking the action requested, charge a reasonable fee or refuse to act on the request. The Data Controller may refuse to comply with the request to exercise the rights of the data subject until it can be identified beyond doubt.



#### ***4.1. Right of access and right to obtain a copy***

The data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed. Based on the right of access, the data subject has the right to obtain access to the personal data related to the ongoing data processing and to the following information about the purpose of data processing, the categories of personal data, the duration of data processing, who received or received the personal data of the data subject and for what purpose, his or her rights related to data processing, the right to lodge a complaint with a supervisory authority.

At the request of the data subject, the Data Controller shall provide him or her with a copy of the personal data undergoing processing, insofar as this does not adversely affect the rights and freedoms of others. For further copies requested by the data subject, the Data Controller may determine a reimbursement of costs.

#### ***4.2. Right to amend, rectify and complete data***

The data subject may request the modification (correction) of inaccurate personal data concerning him or her or the completion of incomplete personal data through the contact details provided in point 1. The Data Controller shall notify the data subject of the rectification.

If the data subject has a user account in the Data Controller's online ticketing systems, the data subject has the opportunity to modify the personal data recorded in the user account independently.

#### ***4.3. Right to withdraw consent***

The data subject may withdraw his or her consent given pursuant to Article 6 (1) (a) of the GDPR without time limit at any of the contact details of the Data Controller, which shall not affect the lawfulness of data processing based on consent prior to its withdrawal. If the data subject withdraws his or her consent to data processing, the Data Controller shall delete the data of the data subject without delay and shall inform the data subject of the measures taken.

The data subject may withdraw his/her consent given within the framework of the data processing process indicated in Section 3.1 [registration on online ticketing platforms] at any time by deleting the user profile.

#### ***4.4. Right to erasure of data ('right to be forgotten')***

The data subject may request the erasure of his or her personal data if the purpose of the processing no longer applies, if the data subject withdraws his or her consent, if the processing of the data is unlawful, if the specified time limit for storing the data has expired, if the data subject has objected to the processing of his or her personal data and there are no legitimate grounds for further processing; and if cancellation has been ordered by a court or authority. The Data Controller shall notify the data subject of the erasure of personal data. The Data Controller shall not delete personal data if they are necessary for compliance with a legal obligation to which the Data Controller is subject, as well as for the establishment, exercise or defence of legal claims.

We inform the data subject that the e-mail address and registration data provided for the non-activated registration will be deleted automatically 72 hours after sending the activation email.

We inform the data subject that deleting the user account associated with an activated registration can only be deleted in the following ways:

- in the case of the ticket purchase system accessible from the MÁV-START website (new Elvira), after logging in, in the "My profile" menu item, using the "Delete account" function;
- within the MÁV application, in the "My Account" menu item, with the "Delete Account" function.

We inform the data subject that the Data Controller deletes the user profile in the case of users who have been inactive for at least one year (have not logged in to the user profile for at least one year). 30 days prior to deletion, the Data Controller shall inform the data subject about the deletion at his registered e-mail address, after which the data subject has the opportunity to log in to the user profile, thus preventing deletion. If the data subject does not log in despite being informed, the Data Controller shall consider this as a withdrawal of consent to data processing and shall delete the user profile.

A deletion can only be initiated for a user account if all of the prize products contained in it have expired or been refunded. No deletion can be initiated for an account that contains valid or refundable prize products. If the data subject did not initiate the deletion of the user account from the MÁV application and/or logged in to his/her account on a phone other than the one from which the deletion was initiated, please use the "Delete all data" function in the MÁV application in the "Settings" menu or delete the MÁV application from the given phone to delete the data stored on the phone. By pressing the Delete Account button, your registration e-mail address (User ID) will be subject to a deletion subscription, which means that your user account will no longer be available.

We inform the data subject that the Data Controller deletes the user profile of users who have been inactive for at least two years (have not logged in to the user profile for at least two years). The Data Controller shall inform the data subject about the deletion – 30 days before – at his registered e-mail address, after which the data subject has the opportunity to log in to the user profile, thus preventing deletion. The Data Controller shall send a reminder message to the data subject the day before the deletion. If the data subject does not log in despite being informed, the Data Controller shall consider this as a withdrawal of consent to data processing and shall delete the user profile.

#### ***4.5. Restriction of processing***

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

- contests the accuracy of the personal data (in this case, the restriction applies for the period during which the Data Controller verifies the correctness of the data);
- the processing is unlawful, but the data subject opposes the erasure of the data and requests the restriction of their use;

- The purpose of data processing has ceased to exist, but the data subject needs them for the establishment, exercise and defence of legal claims.

The restriction of data processing lasts as long as the reason indicated by the data subject requires it. In this case, personal data – with the exception of storage – shall only be processed with the consent of the data subject; or for the establishment, exercise or defence of legal claims; or to protect the rights of another natural or legal person; or for important reasons of public interest.

#### ***4.6. Right to data portability***

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided, in a structured, commonly used and machine-readable format, furthermore, the data subject have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where processing is based on a contract pursuant to point (a) of Article 6(1) or point (b) of Article 6(1) and the processing is carried out by automated means.

#### ***4.7. Rights to object***

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her based on Article 6 (1) (e) and (f) GDPR. This right can be exercised in the case of data processing specified in points 3.4 and 3.6 of this Privacy Policy. In that case, the controller shall no longer process the personal data unless there are 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 Management contained in this Privacy Policy, the Data Controller shall individually examine the feasibility of fulfilling the request.

#### ***4.8. Legal remedies***

##### ***4.8.1. Right to lodge a complaint***

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 or she may lodge a complaint with the National Authority for Data Protection and Freedom of Information at any of the following contact details:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság  
Headquarters: 1055 Budapest, Falk Miksa utca 9-11.  
Postal address: 1363 Budapest, Pf. 9.  
Telephone: +36 (1) 391-1400 / +36 (30) 683-5969 / +36 (30) 549-6838  
Telefax: +36 (1) 391-1410  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
Webmail: [www.naih.hu](http://www.naih.hu)

#### *4.8.2. Right to a judicial remedy*

If the data subject does not agree with the data processing carried out by the Data Controller or considers that the data controller has violated one of his rights, the data subject may also seek legal remedy directly against the Data Controller, which request shall be submitted to the court of the registered office of the Data Controller or the domicile or residence of the data subject. The court shall deal with the case as a matter of priority.

#### *4.8.3. Right to turn to the Data Controller*

If the data subject has any comments, objections or would like to request information about the processing of his or her personal data, he or she may do so at the [adatvedelem@mav-start.hu](mailto:adatvedelem@mav-start.hu) contact details. If you would like more information about the rights of data subjects provided by MÁV-START Co., the method of exercising data subjects' rights and the details of the assessment of the request, please visit the <https://www.mavcsoport.hu/mav-start/bemutakozas/erintetti-jogok-es-azok-gyakorlasa-tajekoztatas> website, where request forms are also available to facilitate the exercise of data subject's rights.

### **5. Legislation applied and referenced in the course of data processing**

In the course of its data processing processes indicated in Section 4 of this Privacy Policy, the Data Controller shall apply the following legal regulations;

- 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);
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information;
- Regulation (EU) 2021/782 of the European parliament and of the council of 29 April 2021 on rail passengers' rights and obligations;
- Act XLI. of 2012 on Passenger Services;
- Government Decree No. 271/2009 (XII.1.) on the detailed conditions of rail passenger transport on the basis of a national operating licence;
- Government decree No. 38/2024 (II.29.) on public passenger transport travel discounts;
- Act C of 2000 on Accounting;
- Act V of 2013 on the Civil Code;
- Act CXXVII of 2007 on Value Added Tax;
- Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing;
- Decree No 23/2014 of 30 December 2014 on the identification of invoices and receipts for tax administrations and on the tax authority control of invoices stored in electronic form NGM Regulation;



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- Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC;
- Commission Delegated Regulation (EU) 2018/389 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards on strong customer authentication and common and secure open standards of communication.

**MÁV-START Co.  
Data Controller**