



MÁV-START Railway Passenger Transport Co.

1087 Budapest, Könyves Kálmán krt. 54-60.

Email: adatvedelem@mav-start.hu ■ www.mavcsport.hu

Privacy Policy on data processing by MÁV-START Zrt. related to the exercise of data subjects rights

The purpose of this Privacy Policy is to inform the data subject in accordance with the provisions of Article 13 of the General Data Protection Regulation (hereinafter: GDPR) on data processing in connection with the assessment and fulfillment of a request for the exercise of a data subject's rights, as well as its preservation (storage). If the law determines different rules with respect to a request submitted in a case (e.g. handling consumer complaints), then a separate Privacy Policy sheet applies to data processing, which is available on the website of the Data Controller.

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: adatvedelem@mav-start.hu
hereinafter: Data Controller.

Contact details of the Data Protection Officer:

E-mail: adatvedelem@mav-start.hu

Postal adress: 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 Controller and the Data Processor, the Data Processor provides an IT service to the Data Controller, which includes the operation of communication applications (email system) and the server service required for the electronic storage of data. In view of this, the personal data processed electronically as indicated in this Privacy Policy is stored by the Data Processor on behalf of the Data Controller and preserved in accordance with the Data Controller's instructions.

3. The data subject

With regard to the data processing included in this Privacy Policy sheet, all natural persons who submit a request to exercise a data subject right contained in the GDPR – on paper, electronically or on the basis of a record of the request submitted orally – to the Data Controller are considered data subjects (hereinafter: data subject).

4. Information on data processing

Purpose of the data processing: the evaluation and fulfillment of the data subject's request and submission received by the Data Controller, within this framework the identification of the data subject, the contact with the data subject, as well as the verification of the fulfillment of the request, as well as the preservation and archiving in the public interest in accordance with the laws applicable to the Data Controller as a person performing a public duty.

The legal basis of the data processing: according to Article 6(1)(f) of the GDPR, the data processing is necessary to assert the legitimate interest of the Data Controller, which manifests itself in the legal interest that the Data Controller has – in accordance with Article 5(2) of the GDPR and Articles 12-22 of the GDPR – comply with the obligations regarding the evaluation and fulfillment of the data subject's request contained in its articles.

If special data is indicated in the request, the legality of the data processing with regard to special data is based on Article 9 (2) (f) of the GDPR in addition to Article 6 (1)(f) of the GDPR, according to which the special data is necessary for the establishment, enforcement and protection of legal claims.

Categories of personal data and the purpose of their processing:

<i>Categories of personal data</i>	<i>Purpose of processing</i>
<p>The personal data required to identify the data subject, which may vary depending on the quality of the data subject (e.g. passenger or employee) and what kind of personal data is processed in the context of a given process.</p> <p><i>Data required to identify the data subject:</i> name, place and time of birth, mother's name, contact details of the data subject (address, e-mail address or telephone number), personal identification number in the case of an employee as a data subject, and other data enabling identification of the data subject.</p> <p><i>Other managed personal data:</i> the personal data provided by the data subject in the application, possibly including special categories of personal data (e.g. health data), and all data generated in connection with the fulfillment of the request.</p>	<p>The purpose of processing personal data is to properly identify the data subject, as well as to properly evaluate and fulfill the request, to take the measures necessary for fulfillment, to maintain contact with the data subject, including the request for additional information related to the request and the response to data subjects request, as well as documenting the documents generated in connection with the request.</p>

Duration of the data processing

a) the Data Controller process the personal data processed in connection with the request primarily until the data subject is identified, the request is fulfilled and answered. After processing the request, the Data Controller will keep the documents containing personal data in accordance with point b) for the purpose of archiving in the public interest.

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b) the Data Controller files the documents related to the case in accordance with the legal requirements for the document management of bodies performing public duties, and among the filed documents, it is managed until the disposal period specified in the file storage plan in force at all times (5 years in this case). The Data Controller process the data together with the documents for archiving purposes until disposal. At the time of disposal, the Data Controller deletes (discards) documents containing personal data.

Method of data processing: electronically and also on paper if the data subject has submitted the request on paper.

Source of data: the data subject.

Recipient of the personal data: Hungarian Post. (headquarters: 1138 Budapest, Dunavirág utca 2-6.): during the given procedure, the Data Controller transfers personal data to the recipient in the context of maintaining contact with the applicant (e.g. delivery of postal items).

5. Rights of the data subject and their enforcement

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

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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 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 through any of the contact details of the Data Controller if the purpose of the data processing has ceased, if the processing of such data is unlawful, if the specified period for storing the data has expired, if it has been ordered by a court or authority, and if the data subject has objected to the data management and there is no priority legitimate reason for data processing. We would like to inform you that if you submit a request for data deletion during the period when the Data Controller is obliged to process personal data, the Data Controller will refuse to fulfill the deletion request in accordance with Article 17 (3) point b) of the GDPR. If the Data Controller still needs to process personal data in order to submit, enforce and protect legal claims, it may refuse to fulfill the deletion request in accordance with Article 17, paragraph (3) point (e) of the GDPR. We would like to inform you that the Data Controller evaluates your request for the deletion of personal data individually in each case, examining whether the request can be fulfilled or whether there are any circumstances that could lead to the refusal to fulfill the request.

The Data Controller notifies the data subject of the evaluation of the request and the measures taken as a result of it, as well as all those to whom the data was previously transmitted for the purpose of data processing.

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:

- a) 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);
- b) the data processing is illegal, but the data subject opposes the deletion of the data and requests the restriction of their use;
- c) 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

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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/her personal data based on points f) of Article 6 (1) of the GDPR for reasons related to his own situation. 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. We would like to inform you that if you exercise your right to object to data processing contained in this Privacy Policy, the Data Controller will indicate its interest in maintaining the register as a compelling legitimate reason, according to which it must comply with the accountability requirement set out in Article 5 (2) of the GDPR and the Data Controller must be able to prove that the data subject's request has been fulfilled. In addition, the document management rules applicable to the Data Controller as a person performing a public duty, according to which the documents containing personal data must be stored until the deadline for their preservation, are also considered compelling legitimate grounds for data processing.

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



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Email: adatvedelem@mav-start.hu ■ www.mavcsoport.hu

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 in connection with 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 LXVI of 1995 on the protection of public records, public archives and private archive material. law (Ltv.);
- Government decree no. 335/2005. (XII. 29.) on the general requirements for document management of bodies performing public duties.

**MÁV-START Zrt.
Data Controller**