

Privacy policy on the data processing performed by MÁV-START Zrt. in connection with the issuance and verification of the solidarity ticket

1. The identity and contact details of the data controller

Name: **MÁV-START Vasúti Személyszállító Zártkörűen Működő Részvénytársaság**
Headquarters: 1087 Budapest, Könyves Kálmán krt. 54-60.
Company reg. no.: 01-10-045551
Tax number: 13834492-2-44
E-mail: informacio@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: „for the Data Protection Officer”.

2. Information about the „Data processing”

2.1. The data subject: all natural persons who hold an identity document issued by an Ukrainian authority (identity card or passport, hereinafter referred to as „the Document”) and present it to the Data Controller in order to issue a "solidarity ticket" entitled to use the domestic railway passenger transport service (hereinafter referred to as „the Service”) free of charge or who presents the solidarity ticket and the document when using the data controller's service (hereinafter: „the Data Subject”).

2.2. Purpose and method of the data processing: the provision of the Data Controller's Service to the Data Subject free of charge, in this context the verification of the right to use the service and the issuance of the solidarity ticket. Data processing is carried out only through access (consultation) to the Document.

2.3. Legal basis of the data processing: pursuant to Article 6(1)(e) of the General Data Protection Regulation (GDPR) of the European Union, the performance of the tasks of the Data Controller in the public interest, as defined in Article XLI of 2012 on Passenger Transport Services Act.

2.4. Period of the data processing: considering that the data processing takes place by inspecting the Document of the Data Subject, the duration of the data processing lasts until the inspection of the Document, i.e. the right to issue a solidarity ticket,

2.5. Persons entitled to access the data: the employees entitled to issue and to check the lawfulness of using the solidarity ticket.

2.6. Obligation to provide personal data and consequences of failure to provide data: the Data Subject is obliged to present an identity document issued by an Ukrainian authority in case of requesting the issuance of a solidarity ticket or free use of the Data Controller's Service. Failing this, the Data Controller will not be able to issue a solidarity ticket entitling to use the Service free of charge (i.e. the Data Subject can only use the Service in accordance with the Data Controller's General Terms&Conditions), and when using the Data Controller's Service, the Data Controller will not be able to verify that the solidarity ticket is used by the person entitled to do so.

3. Rights of the Data Subject and method of enforcement

The Data Subject may request information from the controller at the contact details provided in point 1 and may object to the data processing. Due to the nature of the data processing, the Data Subject does not have the possibility to request the correction or deletion of his / her personal data and the restriction of the data processing. Upon request, the Data Controller shall provide information on the personal data processed by the Data Controller, the purpose, legal basis, duration of the data processing, the name, address (headquarters) of the data Controller or the Data Processor and the activities related to data processing, about who and for what purpose will receive or have received the personal data of the Data Subject and the rights in relation to the processing. The Data Controller shall provide the information in writing in a comprehensible form as soon as possible after the receipt 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 period may be extended by a further two months. If the request for information is unfounded or, in particular due to its repetitive or excessive nature, the Data Controller may refuse to act on the request. The Data Controller may refuse to comply with a request to exercise the Data Subject's rights until the Data Controller cannot identify the Data Subject beyond doubt.

3.1. Right of access

The Data Subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- the rights of the Data Subject;
- the right to lodge a complaint with a supervisory authority;

At the request of the Data Subject, the Data Controller shall provide a copy of the personal data subject to data processing, provided that this does not adversely affect the rights and freedoms of others. The Data Controller may charge a fee for any additional copies requested by the Data Subject.

3.2. Right 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, which is based on point (e) of Article 6(1). In this case, the Data Controller shall no longer process the personal data unless the Data 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 camera surveillance, the Data Controller shall examine the feasibility of the request on a case-by-case basis.

3.3. Remedies (Right to Appeal)

In case of violation of the rights of the Data Subject or if the Data Subject does not agree with the Data Controller's decision, the Data Subject can file a complaint at the following contacts of the Hungarian National Authority for Data Protection and Freedom of Information

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.
Telephone no.: +36 (1) 391-1400 / +36 (30) 683-5969 / +36 (30) 549-6838
E-mail: ugyfelszolgalat@naih.hu
Website: <https://naih.hu/about-the-authority>

In the event of a breach of rights of the Data Subject, or if the Data Subject doesn't agree with the Data Controller's decision, the Data Subject may bring a direct action against the Data Controller in the court of the Data Controller's or his/her domicile.

If the Data Subject require further information in addition to that contained in this Privacy Policy, may request information through the contact details provided in Section 1. If the Data Subject has any remarks or objections regarding the processing of his/her personal data, or would like to request information on the processing of his/her data, he/she can do so by e-mailing the Data Protection officer at adatvedelem@mav-start.hu. If you would like to find out more about the rights of the Data Subjects provided by MÁV-START Zrt., and about how to exercise the rights of the Data Subjects please visit the website: <https://www.mavcsoport.hu/en/mav-start/introduction/rights-data-subject-and-their-enforcement>.

MÁV-START Zrt.
Data Controller