



**MÁV-START Railway Passenger Transport Co.**

1087 Budapest, Könyves Kálmán krt. 54-60.

Website: <https://www.mavcsoport.hu/en>

## **Privacy policy on data processing in connection with the notification and fulfillment of special travel requests**

The purpose of this Privacy Policy is to provide information for data subjects in accordance with the provisions of Articles 13 and 14 of the General Data Protection Regulation of the European Union (hereinafter: GDPR) about the data processing by the Data Controller in connection with the notification, assessment and fulfillment of requests of special travel need. A special travel need is defined as a travel need that is declared due to the disability or reduced mobility of the data subject (e.g. wheelchair travel or need for other assistance).

### **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: [megrendeles@mav-start.hu](mailto:megrendeles@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 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](mailto:helpdesk@mav-szk.hu)  
hereinafter: Data Processor 1.

Based on the contract between the Data Controller and Data Processor 1, it provides *IT services* to the Data Controller, which includes the operation of communication applications (e.g. mail system) and the server service for data storage.

Name: Care All Kft.  
Headquarters: 1121 Budapest, Törökbálinti út 15. A. ép. fszt..;  
Company reg. no.: 01-09-727414  
hereinafter: Data Processor 2.

Based on the contract between the Data Controller and Data Processor 2, it operates the Andoc system, in which the Data Controller stores requests for special travel needs.

### 3. Information on individual data processing

<p><b>The data subject</b></p>	<p>the natural person who notifies the Data Controller of a special travel request, such as a request for travel with a wheelchair or a request for assistance in view of his or her disability or reduced mobility.</p>	
<p><b>Purpose of the data processing</b></p>	<p>satisfying the special travel needs of the data subject, within the framework of this, providing the necessary conditions for traveling with a wheelchair, as well as providing the necessary assistance for his/her travel in view of his/her disability or reduced mobility, as well as documenting whether the travel need was provided or for what reason it could not be provided. In the framework of this, it is necessary to transfer personal data to MÁV Zrt., which is involved in the organization of the trip, or if the travel request also affects the services of another railway company (GYSEV Zrt. in the case of domestic travel, or the service provider of the given country in the case of international travel), then the personal data must be forwarded to the railway company participating in the journey.</p>	
<p><b>Information on data processing for purposes other than the original purpose</b></p>	<p>if the data subject reports his special travel request via the Data Controller's telephone customer service (MÁVDIREKT), but after identifying the data subject it is established that he/she has already reported a special travel request by phone within 5 years, the Data Controller will use the information contained in the previous request report to facilitate administration. In this way, when recording the new request, it is not necessary to communicate the data required to fulfill the request again, but the data stored in the Data Controller's system is only checked and the new request is recorded based on this. The Data Controller has examined the compatibility of data processing for a purpose other than the original purpose (see above) and, bearing in mind that both are related to the passenger transport service provided to the data subject in accordance with his special travel needs, the Data Controller therefore considers the use of personal data originally processed for documentation purposes to facilitate the recording of the new request to be compatible in order to speed up administration.</p>	
<p><b>Personal data processed to achieve the purpose of data processing</b></p>	<p><i>Scope of processed personal data</i>      Purpose of processing personal data</p>	
	<p>Name of the data subject, the exact date of notification of the request</p>	<p>Identification of the data subject</p>
	<p>According to the data subject's choice, his /her phone number and/or e-mail address</p>	<p>Contact with the data subject</p>
	<p>The data relating to the departure and return journey (day of travel, departure, transfer and destination stations, train departure time), data relating to the wheelchair (wheelchair type, weight, width, length, collapsibility), other information relating to mobility restrictions (can you sit, can you use the toilet independently, are you traveling alone or with an escort, who, where and when will collect the ticket.</p>	<p>Organization of wheelchair travel for the affected person</p>

<p><b>Legal basis of the data processing</b></p>	<p>the legality of data processing is based on Article 6 (1) point b) of the GDPR, since data processing is necessary for the performance of the passenger transport contract between the data subject and the Data Controller, and if the special travel request cannot be fulfilled based on the notification, then data processing is necessary for the data subject to take the necessary steps to conclude a passenger transport contract between the data controller and the data subject based on his initiative.</p> <p>The legality of the processing of special data (health data) is ensured by Article 9 (2) point b) of the GDPR, according to which data processing is necessary for the fulfillment of the obligations of the data controller arising from EU and national legal regulations guaranteeing the social security of the data subject and the specific rights of the data subject - for exercising the right to travel, which obligations are set out in Chapter V of Regulation 2021/782/EU, as well as in the 271/2009 (XII.1.) Government Regulation.</p>
<p><b>The duration of the data processing</b></p>	<p>the Data Controller stores personal data for 5 years from the completion of the special travel request.</p>
<p><b>Source of the data</b></p>	<p>a) if the data subject reports his special travel request directly to the Data Controller, the source of the personal data is the data subject.</p> <p>b) if the data subject reports his/her special travel request to another – domestic (e.g. GYSEV Zrt.) or foreign – railway company, but the Data Controller is also responsible for the execution of the trip, the source of the personal data is the railway company to which the data subject notified his/her request.</p>
<p><b>Legal consequences of not providing personal data</b></p>	<p>if the data subject does not make available to the Data Controller his/her data, the Data Controller is unable to organize the railway passenger transport (travel by train) of the data subject.</p>
<p><b>Recipient of the data</b></p>	<p>if the data subject's trip is international, the data will be forwarded to the railway company involved in the execution of the trip as follows:</p> <hr/> <p><b>MÁV Zrt.</b> (headquarters: 1087 Budapest, Könyves Kálmán krt. 54-60., Company reg. no.: 01-10-042272). <i>Purpose of data transfer:</i> in order to ensure the necessary infrastructural conditions to complete the special travel needs. <i>The legal basis of data transfer:</i> based on Article 6 (1) point b) of the GDPR, data management is necessary for the fulfillment of the contract between the Data Controller and the data subject. Forwarding the information necessary to fulfill the special travel request which is mandatory based on Article 24 (1) point a) of Regulation 2021/782/EU.</p> <hr/> <p><b>Győr-Sopron-Ebenfurti Vasút Zrt. – GYSEV Zrt.</b> (headquarters: 9400 Sopron, Mátyás király utca 19., Company reg. no.: 08-10-001787). <i>Purpose of data transfer:</i> if the special travel request also affects the service of GYSEV Zrt., the personal data of the data subject will be forwarded to GYSEV Zrt. in order to ensure the trip. <i>The legal basis of data transfer:</i> based on Article 6 (1) point b) of the GDPR, data management is necessary for the fulfillment of the contract between the Data Controller and the data subject. Forwarding the information necessary to fulfill the special travel request which is mandatory based on Article 24 (1) point a) of Regulation 2021/782/EU.</p>

	<p><b>In the case of the data subject's international travel, the foreign railway company – including a railway company operating in a third country outside the EEA – which contributes to the organization of the journey.</b></p> <p><i>Purpose of data transfer:</i> if the special travel request concerns an international relationship, the personal data will be forwarded to the railway company involved in the organization and execution of the international travel. <i>The legal basis of data transfer:</i> based on Article 6 (1) point b) of the GDPR, data management is necessary for the fulfillment of the contract between the Data Controller and the data subject. Forwarding the information necessary to fulfill the special travel request which is mandatory based on Article 24 (1) point a) of Regulation 2021/782/EU.</p>
	<p>If a railway company operating in a third country outside the EEA also participates in the execution of the trip, the legality of the transmission of the data subject's personal data is supported by Article 49 (1) point b) of the GDPR, according to which data transmission to a third country is necessary for the fulfillment of the contract between the Data Controller and the data subject.</p>

#### **4. 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.

##### **4.1. 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.

#### ***4.2. 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.

#### ***4.3. 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.

#### ***4.4. 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.

#### ***4.5. Remedies (Right to appeal)***

##### ***4.5.1. The right to contact the Data Controller***

If the data subject has comments or objections regarding the processing of his / her 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>.

#### 4.5.2. 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:	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
Website:	<a href="http://www.naih.hu">www.naih.hu</a>

#### 4.5.3. 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.

### 5. Legislation applied and referred to during above-mentioned data processings

- 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
- Regulation (EU) 2021/782 of the European Parliament and of the Council on rail passengers' rights and obligations Act XLI of 2012 on passenger transport services;
- Act V of 2013 on the Civil Code;
- 271/2009. (XII. 1.) Government decree on the detailed conditions of rail passenger transport based on the national operating license.

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