

## Privacy notice for the participation in MOL Annual General Meeting

Denomination and purpose of the data processing	Legal basis of the data processing	Scope and source of the processed personal data	Duration of the data processing	Recipient of the data transfer	Data processor and its processing activity
<p>Ensuring the participation of shareholders in MOL Annual General Meeting, registration at the site, ensuring voting system for the shareholders to exercise their voting rights, preparing a list of participants of the shareholders</p>	<p>The processing is necessary for compliance with a legal obligation to which the controller is subject, based on Article 6 (1) c) of GDPR. List of references to legislation on which the legal obligation is based:  <b>Act V of 2013 on the Civil Code</b>, Sections 3:245 - 3:248; 3:253 - 3:262; 3:273 - 3:278.  <b>Act CXX of 2001 on the Capital Market</b>, Section 5 paragraph (1) point 127 and Section 149.  <b>Government regulation of 67/2014. (III. 13.) on Rules for the Administration of Share Registers</b></p>	<p><b>Content of the list of participants</b> (shareholder or the name and address of the representative or its registered seat, number of shares and the number of votes, furthermore personal changes in the participants during the Annual General Meeting)  <b>content of the Share Register</b> (name of the shareholder, in case of jointly owned share the name of the joint representative, address or registered seat, number of shares or interim share of the shareholder by each series of shares, percentage of control of shareholder), <b>content of the protocol</b> (name of the chairman of the meeting, registrar, verifier of the protocol and the tellers, proposals for decision, by each and every decision: the number of shares for</p>	<p>MOL Plc. processes the personal data in the Share Register and in the list of participants as information of public interest.</p>	<p>MOL Plc. is obliged to submit the protocol of the Annual General Meeting and the list of participants to the competent court within 30 days after the end of the Meeting.</p>	<p>KELER Központi Értéktár Zártkörűen Működő Részvénytársaság (Registered seat: 1074 Budapest, Rákóczi út 70-72.)  Tasks related to the organisation and management of the Annual General Meeting, among others keeping the list of participants, ensuring the counting of the votes and registering the votes in the Share Register.</p> <p>DCN Rental Kft. (Registered seat: 3000 Hatvan, Rákóczi út 99.), as data processor used by KELER Központi Értéktár Zártkörűen Működő Részvénytársaság  Ensuring the vote-counting system. The sub-data processor deletes the personal data one year after the end of the Annual General Meeting.</p>

		<p>which votes have been validly cast, the proportion of the share capital represented by those votes, the number of votes for and against and the number of persons who abstained from voting; the signature of the registrar and the chairman of the meeting, signature of a participating shareholder nominated for that purpose)</p> <p>Source of the data: given by the data subject</p>			<p>Roxer Kommunikációs Kft. (Registered seat: 2040, Budaörs, Kossuth Lajos u.40)</p> <p>Roxer Kommunikációs Kft. – making nametags, organising the parking, making list of participants and providing it to Investor Relations department of MOL Plc.</p>
<p>Taking photos (mass pictures) of the event</p> <p>Mass pictures will be taken only in the main room. You will not appear on these pictures if you will sit in the defined area in the room.</p>	<p>Legitimate interest of the data controller based on Article 6 (1) f) of GDPR</p> <p>Legitimate interest of the data controller: to promote the MOL Group events. The Annual General Meeting is very important in the functioning of MOL Plc., where top managers of MOL Plc., shareholders and their representatives take</p>	<p>Image</p> <p>- taken of the data subject</p>	<p>Photos taken at the event remain available during 60 days from the event on the internal intranet site of MOL Group</p>	<p>a) Article, photo and edited video of the event will be published on internal online portals (GP, ePanorama);</p> <p>b) Photos of the event will be published in internal printed materials (MGP, Panorama);</p> <p>c) Press release and photo will be sent for the Hungarian and</p>	<p><b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (Registered seat: 1117 Budapest, Budafoki út 79.) – providing IT and server services closely linked to the data processing</p> <p><b>Digipix Services Kft.</b> (Registered seat: 1119, Budapest, Pór Bertalan köz 4. II. emelet 4.) Task: making mass pictures only in the concert hall of BMC, during the time of the Annual General Meeting.</p>

	<p>part. However numerous shareholders do not take part personally, therefore making photos and videos then share these records with the general public ensures the promotion of MOL Plc. and the requirements of publicity and transparency at the same time. Because of these it is particularly important for the data controller to make records of the event.</p> <p>The legitimate interest assessment is available as an annex of this privacy notice</p>			<p>international press;  d) Photo and video might be uploaded to social media platforms (e.g. LinkedIn) of MOL</p> <p>The intranet platform of MOL Group is available to every member company in the Group. Referring to the operation of intranet platform MOL Group member companies deemed to be joint data controllers.</p> <p>Based on the above information the data are processed in countries outside the EU as well (e.g. Serbia, Russia, Pakistan) where an adequate level of personal data protection specified by the GDPR is not ensured. Taking these into consideration MOL</p>	
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				<p>Plc. and the MOL Group member companies located in third countries conclude a model contract regarding the transfers of personal data to third countries in order to ensure an adequate level of protection.</p> <p>Uploading to the LinkedIn platform is deemed to be a data transfer to a third country company, which company is on the list determined by the Privacy Shield Framework, so the adequate level of personal data protection in case of transfers of personal data to third countries is ensured. Photographers of press agencies (e.g. MTI)</p> <p>Data controller will send a short version of the completed video to the press.</p>	
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<p>Taking individual photos of the participants</p> <p>There will be the possibility on the event to get to take photos in an area defined for this purpose. Only managers of MOL Plc. will appear on these photos.</p>	<p>Consent of the data subject, based on Article 6 (1) a) of GDPR</p> <p>Data subject gives the consent if photo is taken of him/her in the defined area.</p> <p>No individual photo can be taken of the data subject in the defined area in lack of consent. The data subject has the right to withdraw the consent anytime. The withdrawal of the consent does not affect the legality of the data processing carried out before the withdrawal, based on that consent.</p>	<p>Image</p> <p>- taken of the data subject</p>	<p>Photos taken at the event remain available during 60 days from the event on the internal intranet site of MOL Group</p>	<p>a) Article, photo and edited video of the event will be published on internal online portals (GP, ePanorama);</p> <p>b) Photos of the event will be published in internal printed materials (MGP, Panorama);</p> <p>c) Press release and photo will be sent for the Hungarian and international press;</p> <p>d) Photo and video might be uploaded to social media platforms (e.g. LinkedIn) of MOL;</p> <p>The intranet platform of MOL Group is available to every member company in the Group. Referring to the operation of intranet platform MOL Group member companies deemed</p>	<p><b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (Registered seat: 1117 Budapest, Budafoki út 79.) – providing IT and server services closely linked to the data processing</p> <p><b>Digipix Services Kft.</b> (Registered seat: 1119, Budapest, Pór Bertalan köz 4. II. emelet 4.) Task: making mass pictures only in the concert hall of BMC, during the time of the Annual General Meeting.</p>
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				<p>to be joint data controllers.</p> <p>Based on the above information the data are processed in countries outside the EU as well (e.g. Serbia, Russia, Pakistan) where an adequate level of personal data protection specified by the GDPR is not ensured. Taking these into consideration MOL Plc. and the MOL Group member companies located in third countries conclude a model contract regarding the transfers of personal data to third countries in order to ensure an adequate level of protection.</p> <p>Uploading to the LinkedIn platform is deemed to be a data transfer to a third country company, which company is on</p>	
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				<p>the list determined by the Privacy Shield Framework, so the adequate level of personal data protection in case of transfers of personal data to third countries is ensured.</p> <p>Photographers of press agencies (e.g. MTI)</p> <p>Data controller will send a short version of the completed video to the press.</p>	
Archiving photos	<p>Legitimate interest of the data controller based on Article 6 (1) f) of GDPR</p> <p>Legitimate interest of the data controller: promoting the MOL Group events, demonstration of the significant events in MOL Group's history also after a longer period of time. To achieve this goal it is important to have available photos taken in the event, chosen for archiving.</p>	<p>Image</p> <p>- taken of the data subject</p>	<p>Photos taken at the event remain available during 60 days from the event on the internal intranet site of MOL Group. The data controller archives the chosen photos. The duration of data processing in case of the archived pictures is 50 years after taking the photos.</p>	<p>No data transfer.</p>	<p><b>MOL Magyarország Informatikai Szolgáltató Kft.</b>  (Registered seat: 1117 Budapest, Budafoki út 79.) – providing IT and server services closely linked to the data processing</p>

	The legitimate interest assessment is available as an annex of this privacy notice				
Enforcement of legal claims of the data controller related to the participation on the Annual General Meeting. This can be defense in legal disputes arose from establishment of legal claims by the shareholders pursuant to Article 17 paragraph (3) point e) referring to the participation on the Annual General Meeting or defense in administrative procedures.	<p>Legitimate interest of the data controller based on Article 6 (1) f) of GDPR. Legitimate interest of the data controller:</p> <p>enforcement of legal claims of the data controller and successful defense in legal disputes arose from establishment of legal claims by the shareholders and defense in administrative procedures.</p> <p>The legitimate interest assessment is available as an annex of this privacy notice</p>	Personal data mentioned in the first row.	The period needed for conducting the procedure or 5 years after the day of the Annual General Meeting. Any of the parties is entitled to establish civil law claim against the data controller pursuant to section 6:22 of the Hungarian Civil Code.	In case of enforcement of legal claim data transfer may arise to the court or authority.	<b>MOL Magyarország Informatikai Szolgáltató Kft.</b> (Registered seat: 1117 Budapest, Budafoki út 79.) – providing IT and server services closely linked to the data processing

**Name, postal address, telephone number, website (where the privacy notices are available) and e-mail address of the data controllers:**

**MOL Plc.** (address: 1117 Budapest, Október huszonharmadika u. 18., telephone number: +36-1-886-5000, website: [www.mol.hu](http://www.mol.hu), e-mail address: [ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu))

The data controllers are deemed to be joint data controllers in relation with the operation of the intranet platform whereby they determine the purpose and the scope of the data processing jointly and they are jointly liable for the data processing. The data controllers apply a common privacy notice.

**Contact person(s) of the data controller(s):**

**MOL Plc.**

1117 Budapest, Október huszonharmadika utca 18.

+36 1 886 5000

[investorrelations@mol.hu](mailto:investorrelations@mol.hu)

**Contact data of the data controller's Data Protection Officer:**

[dpo@mol.hu](mailto:dpo@mol.hu)

**Persons at the data controller who are authorized to access to the data (by data processing purposes):**

**MOL Plc.** – employees of the following departments: Corporate Communications Department, MOL Legal Department, Investor Relations Department

**Name, postal address, telephone number, website (where the privacy notices are available), e-mail address and contact persons of the data processor(s) and other data controller recipient(s):**

Event Coordinator

Roxer Kommunikációs Kft.

2040, Budaörs, Kossuth Lajos u.40

Tasks: making nametags, organizing the parking, making list of participants and providing it to Investor Relations department of MOL Plc.

Photographer

Digipix Services Kft.



1119, Budapest, Pór Bertalan köz 4. II. floor 4.

Tasks: making mass pictures only in the concert hall of BMC, during the time of the Annual General Meeting.

KELER Központi Értéktár Zártkörűen Működő Részvénytársaság (1074 Budapest, Rákóczi út 70-72.)

**Persons at the data processor who are authorized to access to the data:**

Event Coordinator

Roxer Kommunikációs Kft.

2040, Budaörs, Kossuth Lajos u.40 – Employees working on the site

Photographer

Digipix Services Kft.

1119, Budapest, Pór Bertalan köz 4. II. floor 4. – The person who takes the photos

KELER Központi Értéktár Zártkörűen Működő Részvénytársaság (1074 Budapest, Rákóczi út 70-72.)

**Processing of sensitive personal data for the purpose specified in this privacy notice:** processing of sensitive personal data does not take place.

**Description of the processing activity:**

At the event the photographer, committed by MOL Plc. primarily takes mass pictures (photos of a crowd, or a group of people, but not of individuals, or some individuals, where the individual nature is determinative). The Data Controller uses the photos for the promotion of the MOL Group events, also it collects them, and gives access to the participants, and possibly uses it for internal communication (intranet, MOL Group magazines). It is not the aim of the Data Controller to take individual photos of the participants, but it can happen, that the invitees will be photographed that way. If the Data controller takes individual photos or hires a photographer who takes individual photos, the photos will be taken within a clear framework only of those persons who explicitly indicate that they would like to be photographed. For example if someone asks the photographer to take photos of him/her or they are photographed in a place separated for this purpose.

**Transfer of personal data to a third country:** The intranet platform of MOL Group is accessible from every company within MOL Group. In relation with the operation of the intranet platform the companies belonging to MOL Group are deemed to be joint data controllers.

Transfer of personal data to third countries takes place where MOL Plc. publishes the photos on MOL Group's intranet site to which also those MOL Group member companies' employees have access which companies are located in third countries.

Based on the previous information the data are processed in countries outside the EU as well (e.g. Serbia, Russia, Pakistan) where an adequate level of personal data protection specified by the GDPR is not ensured. Taking these into consideration MOL Plc. and the MOL Group member companies located in third countries conclude a model contract regarding the transfers of personal data to third countries in order to ensure an adequate level of protection.

Uploading to the LinkedIn site is deemed to be a transfer of personal data to a third country. However, LinkedIn is a company which is on the list established by the EU-US Privacy Shield framework thus ensuring the adequate safeguards to the transfer of personal data to a third country. Further information is available on the following site: <https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0&status=Active>.

**The existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject:** Data controller does not carry out automated decision-making nor profiling activity.

#### **Data security measures:**

The controller stores your personal data in an encrypted and/or password protected database in order to ensure the secrecy, integrity and availability of your personal data in accordance with the IT security norms and standards. Within the framework of risk-proportionate protection and measuring the classification of personal and business data, the data controller ensures the protection of data on a network, an infrastructural and an application level (with firewalls, antivirus programs, encryption mechanisms for storage and communication; in this case the encrypted data flow is not retrievable without knowing the decryption code due to the asymmetric coding, in addition with content filtering and other technical and process solutions). The data security incidents are constantly monitored. The photographer hands over the photos taken in the event to the employees of MOL Corporate Communications who store the photos in password protected folders. Data controller stores the lists of participants in paper format, in lockable archives.

#### **Your data protection rights:**

The GDPR contains in detail your data protection rights, your possibilities of seeking a legal remedy and the restrictions thereof (especially sections 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You can request at any time information about your personal data processed, you can request the rectification and erasure of your personal data or the restriction of their processing, furthermore you can object to the data processing based on a legitimate interest and to the sending of direct marketing messages, and you have the right to data portability. We summarize the most important provisions below.

**Right to information:**

If the data controller processes your personal data it must provide you information concerning the data relating to you – even without your special request thereof – including the main characteristics of the data processing just as the purpose, grounds and duration of control, the name and address of the data controller and its representative, the recipients of the personal data (in case of data transfer to third countries indicating also the adequate and appropriate guarantees), the legitimate interests of the data controller and/or third parties in case of a data processing based on a legitimate interest, furthermore your data protection rights and your possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), in the case if you have not had yet all this information. In case of automated decision-making or profiling the data subject must be informed in an understandable way about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Data controller provides you the abovementioned information by making this privacy notice available to you.

**Right of access:**

You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain information related to the data processing such as the purpose of the data processing, the categories of the personal data processed, the recipients of the personal data, the (scheduled) duration of the data processing, the data subject's data protection rights and possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), furthermore information on the source of the data where they are collected from the data subject. Upon your request the controller shall provide a copy of your personal data undergoing processing. For any further copies requested by you, the controller may charge a reasonable fee based on administrative costs. The right to obtain a copy shall not adversely affect the rights and freedoms of others. The data controller gives you information on the possibility, the procedure, the potential costs and other details of providing the copy after receiving your request.

In case of automated decision-making and profiling the data subject has access to the following information: the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

**Right to rectification:**

You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. This right cannot be interpreted in connection with the photos.

**Right to erasure:**

You have the right to obtain from the controller the erasure of personal data concerning you without undue delay and the controller has the obligation to erase personal data without undue delay where certain grounds or conditions are given. Among other grounds the data controller is obliged to erase your personal data upon your request for

example if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; if you withdraw your consent on which the processing is based, and where there is no other legal ground for the processing; if the personal data have been unlawfully processed; or if you object to the processing and there are no overriding legitimate grounds for the processing; if the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; or if the personal data have been collected in relation to the offer of information society services.

If the data processing is based on your consent the consequence of the withdrawal of the consent:

**If you object to taking photos of you in the event, please inform the photographer about your objection when he is taking the photo. You have the right to ask for the deletion of the photos of you.**

**If you withdraw your consent given to process individual photos of you, the Data controller deletes the individual photos taken of you.**

We inform you that the withdrawal of your consent does not affect the legality of the data processing carried out before the withdrawal, based on your consent.

#### **Right to restriction of processing:**

You have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by you, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- (d) you have objected to processing, pending the verification whether the legitimate grounds of the controller override your legitimate grounds.

Where processing has been restricted according to the abovementioned reasons, such personal data shall, with the exception of storage, only be processed with your 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.

You shall be informed by the controller before the restriction of processing is lifted.

#### **Right to object:**



You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legitimate interests of the data controller. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**We provide you the possibility to indicate at the event that you wouldn't like that photos may be taken of you. You can indicate this request also by taking your seat within the main hall - which serves as a place of the annual general meeting – in a sector especially designated for this purpose. The photographers at the event mustn't take photos of those persons who sit down in this designated area. If you are objecting to taking photos of you, please take a seat in the 'no photo' area of the main hall especially designated for this purpose and inform the photographer about your objection if it is necessary when the photos are being taken elsewhere. You have the right to ask for the deletion of those photos on which you appear.**

#### **How to exercise your rights:**

The controller shall provide information on action taken on a request based on your abovementioned rights without undue delay and in any event **within one month** of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. If the controller does not take action on your request, the controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the competent data protection supervisory authority (In Hungary the Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information) briefly 'NAIH') and seeking a judicial remedy. Address, telephone number, fax number, e-mail address and website of the NAIH: 1125 Budapest Szilágyi Erzsébet fasor 22/C., Tel: +36 1 391 1400, Fax: +36-1-391-1410, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: <http://naih.hu/>

In the event of any infringement of your rights you may file for court action. The action falls within the jurisdiction of the Törvényszék (General Court). Upon the data subject's request the action can be brought before the Court which is competent based on the domicile or the place of residence of the data subject. The court may order the data controller to provide the information, to rectify, block or erase the data in question, to annul the decision adopted by means of automated data-processing systems, to honor the data subject's objection. The court may order publication of its decision, indicating the identification of the data controller or any other data controllers and the committed infringement.

The data controller concerned shall be liable for any damage caused to a data subject as a result of unlawful processing or by any breach of data security requirements. Where any data controller violates the rights of the data subject relating to personality as a result of unlawful processing or by any breach of data security requirements, the data subject shall be entitled to demand restitution from the data controller concerned. Data controller may be exempted from liability for damages or for payment of restitution if he proves that the damage was caused by or the violation of the rights of the data subject relating to personality is attributable to inevitable reasons beyond his control.

No compensation shall be paid and no restitution may be demanded where the damage was caused by or the violation of rights relating to personality is attributable to intentional or negligent conduct on the part of the data subject.

