MOL Group
Binding Corporate Rules on the Processing of Personal Data

SUMMARY
effective from: 1 April, 2026

Introduction

Protecting the personal data of customers and Employees (hereinafter: Data Subjects) is a high-level priority for all MOL Group Companies and they are committed consistent and homogenous application of the data protection requirements. An important part of this is to ensure that the Processing is carried out in accordance with the General Data Protection Regulation [Regulation (EU) 2016/679 of the European Parliament and of the Council; hereinafter: GDPR], even if a MOL Group Company processes the Personal Data outside the European Economic Area.

To that end, the MOL Group has adopted Binding Corporate Rules (hereinafter referred to as: BCR), which ensures that all MOL Group Companies comply with the GDPR, regardless of whether the Company is located in the European Union or in a third country. In order for the BCR to be an appropriate safeguard for transfers of personal data outside the European Union, it needs to be approved by the competent supervisory authority. In its Opinion 07/2022, the European Data Protection Board approved the BCR as compliant with the GDPR and the requirements of the European Data Protection Board. In its decision NAIH-5180-1/2022 the Hungarian Data Protection Authority (NAIH) approved the BCR.

This Summary is to provide comprehensive information about the Processing activities covered by the BCRs and the rights of Data Subjects under the BCRs.

Article 1 – Scope, Applicability and Implementation

The BCR addresses:

(i) the Processing (Transfer) of Personal Data by and among MOL Group Companies when acting as data controllers or as Data Processor on behalf of another MOL Group Company acting as data controller. This BCR applies to data transfers among MOL Group Companies in the same country.
(ii) the Processing where one or more MOL Group Companies jointly with MOL Plc. determine the purposes and means of Processing, acting as joint controllers.

This BCR – including Appendices and Annexes – is legally binding and applicable, it shall be enforced and respected by every MOL Group Company, including their own Employees and other associated persons (such as agents, contractors etc.) acting based on a contractual relationship with MOL Group Companies in accordance with the Article 29 of the GDPR. Such persons and entities shall also abide by the provisions of the GDPR and the applicable local data protection laws.

Appendix 1 of the BCR contains the member companies of MOL Group that is accessible on request. Appendix 1 will list the MOL Group Companies that typically act as data processors. All other Companies typically act as Data Controllers.

The BCR shall be applicable and adopted by all current and future member Companies of MOL Group, furthermore shall be published and made available to Data Subjects in the following ways:

- for the Employees of MOL Group companies, the BCR shall be published on the Intranet websites of MOL Group https://gp/group/gdpr/Pages/default.aspx ;
- in case of customers of MOL Group Companies and other Data Subjects, a summary of the BCR shall be accessible on the website of MOL Group: https://mol.hu/hu/ and https://molgroup.info/en;
- the full text of the BCR shall be made available upon request of the Data Subjects.

Article 2 – Principles of Processing

2.1 Lawfulness, fairness and transparency

Personal Data shall be Processed lawfully, fairly and in a transparent manner in relation to the Data Subject. It should be transparent to the natural persons (Data Subjects) that their Personal Data are collected, used, consulted or otherwise Processed by a MOL Group Company and also to what extent the Personal Data are or will be Processed. The principle of transparency requires that any information and communication relating to the Processing of those Personal data shall be easily accessible and easy to understand, and that clear and plain language shall be used tailored to the concerned group of Data Subjects and their characteristics (e.g. persons with disabilities or children).

2.2 Purpose limitation

Personal Data shall be collected for specified, explicit and legitimate purposes and shall not be further Processed in a manner that is incompatible with those purposes; further Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

Purpose limitation shall be enforced throughout the entire process of Data Processing. It shall be provided that within MOL Group only the Employees involved in the Processing may access the relevant data.

Each Processing activity shall have at least one definite purpose, a Data Processing activity without a defined purpose shall not be considered as lawful.

2.3 Data minimization

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are Processed. A MOL Group Company shall not carry out a Processing activity, which is unsuitable for achieving the defined purpose.

MOL Group Companies shall delete Personal Data that are not required for the applicable Business Purpose.

2.4 Accuracy

Personal Data shall be accurate and, where necessary, kept up to date; and every reasonable step must be taken to ensure that Personal Data that are inaccurate with regard to the purposes for which they are Processed, are erased or rectified without delay.

2.5 Storage limitation and data quality

Personal Data shall be kept in a form which permits the identification of Data Subjects for no longer than is necessary for the purposes, for which the Personal Data are Processed. Personal Data may be stored for longer periods insofar as the Personal Data will be Processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of the Data Subject.

Storage periods shall be clear and easily understandable for the Data Subjects.

MOL Group Companies may store personal data in line with specific legal requirements or in lack of such requirements, it may specify (e.g. in internal rules, notice or information sheets) a period for which certain categories of Personal Data may be kept, in line with the provisions of the BCR, the GDPR and applicable local laws.

Promptly after the applicable storage period end, the responsible Employee shall make sure that the concerning Personal Data are:

- securely deleted or destroyed; or
- anonymized (including any form of de-identification complying with the rules of anonymisation).

The quality of Personal Data shall be maintained, throughout the entire period of the Processing, by every MOL Group Company that Processes the concerned Personal Data. Such provision does not prevent any MOL Group Company from applying pseudonymisation or other similar techniques with the purpose of complying with the data security requirements.

2.6 Integrity and confidentiality

Personal Data shall be Processed in a manner that the appropriate security of the Personal Data is ensured, including protection against unauthorized or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

MOL Group shall apply risk-proportionate means of protection (e.g. firewalls, antivirus programs, password protected databases, encryption mechanisms) tailored to the Data Processing activities performed by MOL Group Companies.

An internal checklist verifying the compliance with such measures shall be drawn up concerning every MOL Group Company specifying the uniquely applied measures and solutions necessitated by the relevant jurisdiction.

2.7 Accountability

MOL Group Companies shall be responsible for and able to demonstrate compliance with the data protection principles detailed above.

The appropriate technical and organisation measures specified by Appendix 4 of the BCR shall also be implemented by every MOL Group Company within the framework of their accountability obligation. These measures shall be reviewed and updated where necessary.

Article 3 – Data protection by design and by default

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Article 4 – Purposes for Processing Personal Data

The specific purposes of the Data Processing of MOL Group Companies are set out in the privacy notices in force at the time.

The privacy notices are available to clients on the MOL Group Companies' websites, applications (on other main channels of communication) and in case of the Employees are available on the Intranet (on other main channels of communication).

Article 5 – Use for Other Purposes, Use of Personal Data for Secondary Purposes

5.1 General Provisions

Generally, Personal Data shall be Processed only for the Business Purposes for which they were originally collected, and which are defined in the privacy notices in force at the time (hereinafter referred to as: the **Original Purpose**).

Personal Data may be Processed for a legitimate Business Purpose of the MOL Group company different from the Original Purpose (hereinafter referred to as: the **Secondary Purpose**), only if the Original Purpose is compatible with the Secondary Purpose and if it is permitted under the applicable law. In assessing compatibility between the Original and Secondary Purposes, MOL shall take into account, inter alia:

- any link between the purposes for which the personal data have been collected and the purposes of the intended further Processing;
- the context in which the personal data have been collected, in particular regarding the relationship between Data Subjects and the Controller;
- the nature of the personal data, in particular whether special categories of personal data are Processed, or whether personal data related to criminal convictions and offences are Processed;
- the possible consequences of the intended further Processing for Data Subjects;
- the existence of appropriate safeguards, which may include encryption or pseudonymisation.

Depending on the sensitivity of the relevant Personal Data and whether the use of the Data for the Secondary Purpose has potential negative consequences for the Employee or for the other Data Subjects, the secondary use may require additional measures such as:

- limiting access to the Data;
- imposing additional confidentiality requirements;
- taking additional security measures;
- informing the Employee or the other Data Subject about the Secondary Purpose;
- providing an opt-out opportunity or
- obtaining the Data Subject’s consent.

5.2 Secondary purposes that generally be considered legitimate

The MOL shall determine on a case-by-case basis whether the Secondary Purpose is compatible with the Original Purpose.

However, the following Secondary Purposes could be considered legitimate, unless prohibited specifically by the applicable provision of law, provided that appropriate additional measures are taken in accordance with Article 5 of this Summary:

- Implementation of business controls;
- Statistical, historical or scientific research;
- Preparing for or engaging in dispute resolution;
- Legal or business consulting; or
- Establishment or exercise of legal claims, e.g. dealing with insurance claims.

Article 6 – Purposes for Processing Sensitive Data

The MOL Group Companies set out the Data Processing activities that involve the Processing of sensitive data in the privacy notices in force at the time.

The privacy notices are available to clients on the MOL Group Companies' websites, applications (on other main channels of communication) and in case of the Employees are available on the Intranet (on other main channels of communication).

Article 7 – Legal basis for Processing Personal Data

7.1 Consent

Conditions for consent

A consent given by the Data Subject shall meet the following criteria: -
freely given;
- clear and definite (specific); -
informed; and
- unambiguous.

In addition to the Article 7.1 of the Summary, the Data Subject must be clearly informed:

- of the purposes of the Processing for which consent is requested;
- of the possible consequences of not giving consent;
- of the possible consequences of the Processing on the Data Subject's rights and freedoms; and
- that he/she is free to refuse and withdraw his/her consent at any time without consequences.

The consent of an Employee generally cannot be used as a legitimate basis for Processing Employee Data. In the cases where the MOL Group Company determines that the consent meets the criteria mentioned above, it can serve as a legitimate basis for Processing (e.g. participation in internal promotions and voluntary events organized by MOL Group).

If an applicable local law requires, in addition to having a Business Purpose for the relevant Processing, the MOL Group Company shall also seek the Employee's consent to the Processing.

In case of any doubt, it shall be presumed that the Data Subject did not give his/her consent.

When the Processing has multiple purposes, the consent shall be given separately for each of them.

Denial or withdrawal of consent

The Data Subject may at any time both deny consenting or withdraw the consent provided without consequences.

Consent in case of Processing of Sensitive Data

The explicit consent means that the Data Subject must give an express statement of consent, such as in a written statement or by an equivalent electronic means (for example: two stage verification of consent), which clearly indicates that the Data Subject explicitly consents to the Processing of sensitive data.

Where there is a question as to whether the procedure for obtaining consent for sensitive data is appropriate, it is necessary to seek the MOL Group Data Protection Officer advice in case of Group level data Processing activities and in any other cases the local DPO advice, if any, before the Processing takes place.

Article 7.1 of this Summary applies to the granting, denial or withdrawal of consent in accordance with the above detailed.

7.2 Processing for the performance of a contract

If the Processing is necessary for the performance of a contract, to which the Data Subject is party, the contract shall contain all information that should be known by the Data Subject, particularly the description of the data to be Processed, the duration of the data Processing, its purpose, the transfer of the data and its recipients, and the concerned data processors.

Where Processing is undertaken at the Data Subject's request for the performance of a contract prior to entering into a contract, the performance of the contract as a legal basis for data Processing may be relied upon.

7.3 Data Processing permitted or prescribed by law

Where Processing is necessary for compliance with a legal obligation to which the Controller MOL Group Company is a subject, the Processing must be in line with the European Union or Member State law. A legal obligation shall be based on a legal act or the decision of an authority or a court.

If a MOL Group Company Processes Personal Data based on the prescription of law, the purpose, duration, scope and other conditions of Processing are specified by law.

In the above cases, the concerned MOL Group Company must provide information to the Data Subjects on the relevant provision of the law.

7.4 Processing necessary in order to protect the vital interests of the Data Subject or of another natural person

The Processing of Personal Data should also be regarded to be lawful where it is necessary in order to protect the vital interest of the Data Subject or of another natural person.

Processing of Personal Data based on the vital interest of another natural person should in principle take place only where the Processing cannot be manifestly based on another legal basis. Some types of Processing may serve both as grounds of public interest and the protection of vital interests of the Data Subject, e.g. when Processing is necessary for humanitarian purposes, including situations of humanitarian emergencies, in particular in situations of natural and man-made disasters, e.g. riots, uprising and security incidents etc.

7.5 Data Processing necessary for the purpose of legitimate interests

The legitimate interests of a MOL Group Company or a third party may serve as the legal basis for Processing, provided that the interests or the fundamental rights and freedoms of the Data Subject are not overriding, taking into consideration the reasonable expectations of Data Subjects based on their relationship with the Controller.

If Processing is based on the legitimate interests of a MOL Group Company, it shall always be preceded by a legitimate interest assessment (hereinafter: balancing test) with particular attention to the following criteria:

- assessing the lawfulness of the Controller's legitimate interest,
- -assessing the necessity of the data processing,
- assessing the proportionality of data processing,
- impact on the Data Subjects,
- additional safeguards applied by the Controller to prevent any undue impact on the Data Subjects,

provisional balance on the interests defined in (a)-(e),

Article 8 –Data Subject Information Requirements

8.1 General Provisions

Before commencing the Data Processing, the relevant MOL Group Company shall inform the Data Subjects through a published privacy policy or notice in an appropriate way (e.g. information in written form, email or via media publications) tailored to the given Processing activity as described below.

Such information shall provide before the Processing takes place and shall be continuously accessible, well-structured, clear and understandable to the Data Subjects.

8.2. Information to be provided where Personal Data are collected from the Data Subject

Where Personal Data relating to a Data Subject are collected from the Data Subject, the MOL Group Company shall, at the time when Personal Data are obtained, provide the Data Subject with all of the following information:

- the Business Purposes for which their Data are Processed;
- the legal basis for the Processing, and where the Processing is based on point (f) of Article 6 (1) of the GDPR, the legitimate interest pursued by the MOL Group Company or by a third party;
- the name and contact details of the MOL Group Company responsible for the Processing and, where applicable, of the MOL Group Company's representative;
- the contact details of the Data Protection Officer, where applicable;

- the recipients or categories of recipients of the Personal Data, if any;
- where applicable, the fact that the MOL Group Company intends to transfer Personal Data to a third country or international organisation and the existence or absence of an adequacy decision by the EU Commission, or reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

In addition to the information referred to above, the MOL Group Company shall, at the time when the Personal Data are obtained, provide the Data Subject with the following further information necessary to ensure the fair and transparent Processing:

- the period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period;
- the existence of the right to request from the MOL Group Company access to and rectification or erasure of Personal Data or restriction of Processing concerning the Data Subject or to object to Processing as well as the right to data portability;
- where the Processing is based on the consent of the Data Subjects, the existence of the right to withdraw the consent at any time, without affecting the lawfulness of Processing based on consent before its withdrawal;
- the right to lodge a complaint with a Supervisory Authority;
- whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the Data Subject is obliged to provide the Personal Data and of the possible consequences of failure to provide such data;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing.

Where the MOL Group Company intends to further Process the Personal Data for a purpose other than for which the Personal Data were collected, the MOL Group Company shall provide the Data Subject with information on that other purpose and with any relevant further information referred to above prior to that further Processing.

The abovementioned shall not apply where and insofar as the Data Subject already has the information.

8.3. Information to be provided where Personal Data have not been obtained from the Data Subject

Where Personal Data have not been obtained from the Data Subject, the MOL Group Company shall provide the Data Subject with the following information:

- the identity and the contact details of the MOL Group Company and, where applicable, of its representative;
- the contact details of the Data Protection Officer, where applicable;
- the purposes of the Processing for which the Personal Data are intended as well as the legal basis for the Processing;
- the categories of Personal Data concerned;
- the recipients or categories of recipients of the Personal Data, if any;
- where applicable, that the MOL Group Company intends to transfer Personal Data to a recipient in a third country or international organisation and the existence or absence of an adequacy decision by the EU Commission, or reference to the appropriate or suitable safeguards and the means to obtain a copy of them or where they have been made available.

In addition to the information referred to above, the MOL Group Company shall provide the Data Subject with the following information necessary to ensure the fair and transparent Processing in respect of the Data Subject:

- the period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period;
- where the Processing is based on the legitimate interests pursued by a MOL Group Company or by a third party;
- the existence of the right to request from the MOL Group Company access to and rectification or erasure of Personal Data or restriction of processing concerning the Data Subject and to object to Processing as well as the right to data portability;
- where Processing is based on the consent of the Data Subjects, the existence of the right to withdraw the consent at any time, without affecting the lawfulness of Processing based on consent before its withdrawal;
- the right to lodge a complaint with a Supervisory Authority;
- the source from which the Personal Data originates, and if applicable, whether it came from publicly accessible sources;
- the existence of automated decision-making, including profiling, and, 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.

The MOL Group Company shall provide the above information:

- within a reasonable period after obtaining the Personal Data, but at the latest within one month, having regard to the specific circumstances in which the Personal Data are Processed;
- if the Personal Data are to be used for communication with the Data Subject, at the latest at the time of the first communication to that Data Subject; or
- if a disclosure to another recipient is envisaged, at the latest when the Personal Data are first disclosed.

Where the MOL Group Company intends to further Process the Personal Data for a purpose other than that for which the Personal Data were obtained, the MOL Group Company shall provide the Data Subject prior to that further Processing with information on that other purpose and with any relevant further information referred to above.

The foregoing shall not apply where and insofar as:

- the Data Subject already has the information;
- the provision of such information proves impossible or would involve a disproportionate effort, in particular for Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards required by the GDPR or in so far as the obligation referred to above is likely to render impossible or seriously impair the achievement of the objectives of that Processing. In such cases the MOL Group Company shall take appropriate measures to protect the Data Subject's rights and freedoms and legitimate interests, including making the information publicly available;
- obtaining or disclosure is expressly laid down by Union or Member State law to which the MOL Group Company is subject, and which provides appropriate measures to protect the Data Subject's legitimate interests; or

- where the Personal Data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy.

Article 9 – Rights of Data Subjects

9.1 General Provisions

The Data Subject is provided with the following rights, which means that the Data Subjects must at least be able to enforce the following rights:

- right to access to information on request;
- right to rectification;
- right to erasure;
- right to restriction of Processing,
- right to data portability;
- right to object to Processing and automated individual decision-making including profiling;
- right to a complaint with a Supervisory Authority;
- right to an effective judicial remedy against a MOL Group Company or its data processor;
- Third Party Beneficiary Rights.

9.2 Right to access to information on request

Every Data Subject has the right to obtain from the MOL Group Company confirmation as to whether 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 concerned;
- 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;
- 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 existence of the right to request from the MOL Group Company rectification or erasure of Personal Data or restriction of Processing of Personal Data concerning the Data Subject or to object to such Processing;
- the right to lodge a complaint with a Supervisory Authority;
- where the Personal Data are not collected from the Data Subject, any available information as to their source;
- the existence of automated decision-making, including profiling, and, 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.

Where Personal Data are transferred to a third country or to an international organisation, the Data Subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

The MOL Group Company shall provide a copy of the Personal Data undergoing Processing. For any further copies requested by the Data Subject, the MOL Group Company may charge a reasonable fee based on administrative costs. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided in a commonly used electronic form.

The right to obtain a copy referred to above shall not adversely affect the rights and freedoms of others.

9.3. Right to rectification and right to erasure ('right to be forgotten')

The Data Subject shall have the right to obtain from the MOL Group Company without undue delay the rectification of inaccurate Personal Data concerning him or her. Taking into account the purposes of the Processing, the Data Subject shall have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

The Data Subject shall have the right to obtain from the MOL Group Company the erasure of Personal Data concerning him or her without undue delay and the MOL Group Company shall have the obligation to erase Personal Data without undue delay where one of the following grounds applies:

- the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise Processed;
- the Data Subject withdraws the consent on which the Processing is based, and where there is no other legal ground for the Processing;
- the Data Subject objects to the Processing and there are no overriding legitimate grounds for the Processing, or the Data Subject objects to the Processing for direct marketing purposes, including profiling;
- the Personal Data have been unlawfully Processed;
- the Personal Data shall be erased in order to comply with a legal obligation in Union or Member State law to which the MOL Group Company is subject;
- in the case of information society services offered directly to a child, the legal basis for the Processing was the consent of the child and the Data Subject requests the deletion of the data.

Where the MOL Group Company has made the Personal Data public and is obliged, pursuant to the above, to erase the Personal Data, the MOL-Group Company, taking account of the available technology and the cost of the implementation, shall take reasonable steps, including technical measures, to inform controllers and data processors which are Processing the Personal Data that the Data Subject has requested the erasure by such controllers of any links to, or copy or replication of those Personal Data.

The above shall not apply to the extent that Processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires Processing by Union or Member State law to which the MOL Group Company is subject;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred above is likely to render impossible or seriously impair the achievement of the objectives of that Processing; or
- for the establishment, exercise or defence of legal claims.

9.4 Right to restriction of Processing

The Data Subject has the right to restriction of Processing if:

- the accuracy of the Personal Data is contested by the Data Subject for a period enabling the MOL Group Company to verify the accuracy of the Personal Data;
- the Processing is unlawful, and the Data Subject opposes the erasure of the Personal Data and requests the restriction of their use instead;
- the MOL Group Company no longer needs the Personal Data for the purposes of the Processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims;
- the Data Subject has objected to the Processing pending the verification whether the legitimate grounds of the MOL Group Company override those of the Data Subject.

9.5 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 to a MOL Group Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the MOL Group Company to which the Personal Data have been provided, where

- the Processing is based on consent; and
- the Processing is carried out by automated means.

In exercising his or her right to data portability pursuant to the above, the Data Subject shall have the right to have the Personal Data transmitted directly from one controller to another, where technically feasible.

The exercise of the right referred to above shall be without prejudice to the right to erasure ('right to be forgotten').

The right referred above shall not adversely affect the rights and freedoms of others.

9.6 Right to object to Processing

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the Processing of Personal Data concerning him or her where Processing is necessary or for the purposes of the legitimate interests pursued by the MOL Group Company or by a third party (including profiling based on those provisions), except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject, which require protection of Personal Data, in particular where the Data Subject is a child.

The MOL Group Company shall no longer Process the Personal Data unless it 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.

Where Personal Data are Processed for direct marketing purposes, the Data Subject shall have the right to object at any time to the Processing of Personal Data concerning him or her for such marketing purposes, which includes profiling to the extent that it is related to such direct marketing.

Where the Data Subject objects to the Processing for direct marketing purposes, the Personal Data shall no longer be Processed for such purposes.

At the time the latest of the first communication with the Data Subject, the right referred to above shall be explicitly brought to the attention of the Data Subject and shall be presented clearly and separately from any other information.

Where Personal Data are Processed for scientific or historical research purposes or statistical purposes, the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to the Processing of Personal Data concerning him or her, unless the Processing is necessary for the performance of a task carried out for reasons of public interest.

9.7 Right to lodge a complaint with a Supervisory Authority

Without prejudice to any other administrative or judicial remedy, every Data Subject shall have the right to lodge a complaint with a Supervisory Authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the Data Subject considers that the Processing of Personal Data relating to him or her infringes the GDPR and/or the BCR.

9.8 Right to an effective judicial remedy against a MOL Group Company or its data processor

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a Supervisory Authority, each Data Subject shall have the right to an effective judicial remedy, where he or she considers that his or her rights under the GDPR or the BCR have been infringed as a result of the Processing of his or her Personal Data not in compliance with the GDPR or the BCR.

Proceedings against a MOL Group Company or its data processor shall be brought before the courts of the Member State where the MOL Group Company or its data processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the Data Subject has his or her habitual residence.

9.10 Third-party Beneficiary Rights

Data Subjects may enforce the following elements of the BCR against to the MOL Group Companies:

- transparency and easy access to BCRs (Article 1 of this Summary);
- principles of Processing (Article 2 of this Summary);
- purposes for Processing Personal Data (Article 4 of this Summary);
- use for Other Purposes, Use of Personal Data for Secondary Purposes (Article 5 of this Summary);
- purposes for Processing Sensitive Data (Article 6 of this Summary);
- legal basis for Processing Personal Data (Article 7 of this Summary);
- rights of Data Subjects (Article 8, Article 9, Article 10 and Article 12 of this Summary);
- complaints procedure (Article 19 of this Summary);
- Lead Supervisory Authority and cooperation with the Supervisory Authorities (Article 20.3 of this Summary);
- conflict between the BCR and the applicable local law (Article 23 of this Summary);

- jurisdiction under the BCR and BCR enforceable against MOL Plc. (Article 20.4-20.5 of this Summary);
- liability, available remedies, limitation of damages and burden of proof (Article 20.6 of this Summary).

Article 10 – Procedure concerning the Rights of Data Subjects

10.1 Time limits for fulfilling the requests and communication

The MOL Group Company concerned shall provide information on the action taken upon a request submitted by the Data Subject under Article 9 of the BCR and Articles 15-22 of the GDPR, 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 the number of the requests.

The MOL Group Company concerned shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the Data Subject makes the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject.

If the MOL Group Company concerned does not take action upon the request of the Data Subject, it shall inform the Data Subject 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 a Supervisory Authority or seeking a judicial remedy with the competent courts.

The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the Data Subject, the information may be provided orally, provided that the identity of the Data Subject is proven by other means.

10.2 Identification

Where a MOL Group Company concerned has reasonable doubts concerning the identity of the natural person making the request referred to in Articles 9 of the BCR, and Articles 15-22 of the GDPR, it may request the provision of additional information necessary to confirm the identity of the Data Subject.

10.3 Requirements and submitting the request

The Data Subject should send their request to the designated contact person. The contact data of contact persons and data protection officers can be found in the privacy notice concerned.

Prior to fulfilling the request of the Data Subject, the MOL Group Company concerned may require the Data Subject to:

- specify the type of Data to which he/she is seeking access;
- specify the data system, provided that he/she has information on it, in which the Data are likely to be stored;
- specify the circumstances – provided that he/she has information on it – under which the MOL Group Company concerned obtained the Data;

- show proof of his/her identity (e.g. by showing the ID).

The MOL Group Company shall explain in writing (including, where appropriate, by electronic form) to the Data Subject

- why the request cannot be considered specific; and
- as far as possible in the given situation, shall explain how the Data Subject should proceed in order to specify his/her request.

If the Data Subject does not reply to the approach of the MOL Group Company by the 30th day following the submission of his/her original request,

- the MOL Group Company only partially fulfills the request; or
- if the request cannot be fulfilled without specification by the Data Subject, it may be denied.

10.4 Denial of requests

MOL Group Company may deny a Data Subject request, if:

- the request does not meet the requirements of Article 10.3 referred to above;
- the request is not sufficiently specific;
- the identity of the relevant Data Subject cannot be established by reasonable means; or
- the request has repetitive character, especially if the request is made within an unreasonable time interval of a prior request. A time interval between requests of 3 months or less could be deemed to be an unreasonable time interval bearing in mind other aspects of the given requests (e.g. the procedure of the MOL Group Company).

Article 11 – Security and Confidentiality Requirements

[…]

Article 12 – Automated Decision Making, including profiling

The Data Subject shall have the right not to be subject to a decision based solely on automated Processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above shall not apply if the decision:

- is necessary for entering into, or performance of a contract between the Data Subject and a MOL Group Company;
- is authorised by Union or Member State law to which the relevant MOL Group Company is subject and which also lays down suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests; or

- is based on the Data Subject's explicit consent.

In case of decisions necessary for entering into or performance of a contract or being based on the Data Subject's explicit consent, the MOL Group Company shall implement suitable measures to safeguard the Data Subject's rights and freedoms and his or her legitimate interests, at least the right to obtain human intervention on the part of the MOL Group Company, to express his or her point of view and to contest the decision.

Decisions referred to above shall not be based on special categories of personal data referred to in Article 9(1) of the GDPR, unless point (a) or (g) of Article 9(2) of the GDPR (Processing is based on consent or is necessary for reasons of substantial public interest) applies and suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests are in place.

Article 13 – Transfer of Personal Data

[…]

Article 14 – Transfer of Personal Data to External Parties located in Third Countries

[…]

Article 15 – Supervision and compliance

15.1 MOL Group Data Protection Officer

MOL Group DPO
Name: Pál Kara dr.
Company name: MOL Plc.
Registered seat: 1117 Budapest Dombóvári út 28.
Email address: dpo@mol.hu
Correspondence address: 1117 Budapest Dombóvári út 28.

MOL Plc. as MOL Group Headquarter is responsible for the overall/central implementation and maintenance (regular reviewing, amending and updating as necessary) of the BCR – including Appendices and Annexes – and the communication across MOL Group of the actual version of the BCR and MOL Plc. is responsible for maintaining all previous versions of the BCR.

Where any MOL Group Company has reasons to believe that the applicable legislation prevents such MOL Group Company from fulfilling its obligations arising from the BCR or has substantial effect on the guarantees provided by the rules, it will promptly inform MOL Plc. as the Headquarter at the email address: dpo@mol.hu.

MOL Plc. will take the appropriate measures tailored to the affected Personal Data and the nature of the (possible) non-compliance with the BCR.

15.2 Tasks of the MOL Group Compliance unit and the Ethics Council

MOL Plc. designated MOL Group Compliance unit with the following tasks:

(i) supervising compliance with this BCR (and other relevant data protection laws and regulations) by carrying out compliance investigations in data protection area, which are made available to MOL Group Data Protection Officer,

(ii) (ii) organizing and conducting compliance related trainings / awareness program,

MOL Plc. has designated the unit of the MOL Group Ethics Council to perform the following tasks:

collecting, investigating and resolving privacy inquiries, concerns and complaints received via Speak-up system in accordance with applicable policies and laws in cooperation with the competent DPO and Legal organization.

15.3 Local Data Protection Officers

MOL Group Companies have the following local Data Protection Officers:

MOL Plc. DPO
Name: Kara Pál dr.
Company name: MOL Plc.
Registered seat: 1117 Budapest Dombóvári út 28.
Email address: dpo@mol.hu
Correspondence address: 1117 Budapest Dombóvári út28.

MOL Retail Zrt. DPO
Name: Dr Pál Kara
Company name: MOL Retail Zrt.
Registered seat: 1117 Budapest, Dombóvári út 28.
Email address: dpo@mol.hu
Correspondence address: 1117 Budapest, Dombóvári út 28.

MOL Downstream Zrt. DPO
Name: Dr Pál Kara
Company name: MOL Downstream Zrt.
Registered seat: 1117 Budapest, Dombóvári út 28.
Email address: dpo@mol.hu
Correspondence address: 1117 Budapest, Dombóvári út 28.

MOL Upstream Zrt. DPO
Name: Dr Pál Kara
Company name: MOL Upstream Zrt.
Registered seat: 1117 Budapest, Dombóvári út 28.
Email address: dpo@mol.hu
Correspondence address: 1117 Budapest, Dombóvári út 28.

SLOVNAFT, a.s. DPO
Company name: Havel&Partners
Registered seat: Žižkova 7803/9, 811 02 Bratislava, Slovak Republic

SLOVNAFT MONTÁŽE A OPRAVY, a.s. DPO
Company name: Havel&Partners
Registered seat: Žižkova 7803/9, 811 02 Bratislava, Slovak Republic

VÚRUP, a.s. DPO
Company name: Havel&Partners
Registered seat: Žižkova 7803/9, 811 02 Bratislava, Slovak Republic

SLOVNAFT TRANS a.s. DPO
Company name: Havel&Partners
Registered seat: Žižkova 7803/9, 811 02 Bratislava, Slovak Republic

MOL GBS Slovakia, s. r. o. DPO
Company name: Havel&Partners
Registered seat: Žižkova 7803/9, 811 02 Bratislava, Slovak Republic

MOL IT & Digital GBS Slovakia, s. r. o. DPO:
Company name: Havel&Partners
Registered seat: Žižkova 7803/9, 811 02 Bratislava, Slovak Republic

INA DPO: INA,d.d. DPO:
Company Name: OD WAHL & partneri d.o.o.
Registered seat: Business Center International Miramarska cesta 24 10000 Zagreb, Croatia

MOL Polska sp. z o.o.
Name: Aleksander Krawczyk
Registered seat: uL. KRÓLEWIECKA, nr 11, lok. 17, Wrocław 54-117, Poland

MOL SLOVENIJA d.o.o.
Company Name: Karanovic & Partners
Registered seat: Dunajska cesta 163, 1000 Ljubljana, Slovenia

MOL & INA d.o.o. DPO:
Company Name: Karanovic & Partners
Registered seat: Dunajska cesta 163, 1000 Ljubljana, Slovenia

MOL SERBIA D.O.O. BEOGRAD
Company name: Radovanović Stojanović & Partners
Registered seat: Resavska 31, 5th floor, 11000 Belgrade, Serbia

HOLDINA d.o.o .Sarajevo
Company name: PEHAR & LESKO
Registered seat: UI. kardinala Stepinca 12/I | BiH - 88000 Mostar

Energopetrol d.d. Sarajevo
Company name: PEHAR & LESKO
Registered seat: UI. kardinala Stepinca 12/I | BiH - 88000 Mostar

MOL RBS S.r.l.
Company name: BLS-CEE Romania
Registered seat: Bucharest, 84 Timisoara Blvd., Sector 6, Romania

INA Crna Gora
Company Name: Radovanović Stojanović & Partners
Registered seat: Resavska 31, 5th floor, 11000 Belgrade, Serbia

MOL Česká republika, s.r.o.

Article 16 – Policies and procedures

[…]

Article 17 – Training

[…]

Article 18 – Monitoring and investigating compliance

[…]

Article 19 – Complaints procedure

A Data Subject may file a complaint, if:

- the Processing does not comply with the GDPR, the local laws, or other legal requirements (e.g. requirement imposed by a Supervisory Authority);
- the Data Subjects have not been informed about the Processing in accordance with Article 8 of this Summary;
- the response to the request under Article 9 of this Summary is unsatisfactory to the Data Subject (e.g. the request is denied),
- the Data Subject has not received a response as required and within the time period prescribed by Article 10.1 of this Summary; or
- the time period provided to the Data Subject is, in light of the relevant circumstances, unreasonably long and the Data Subject has objected but has not been provided with a shorter and more reasonable time period, in which he/she will receive a response.

Data Subjects may file a complaint concerning any MOL Group Company regarding compliance with the BCR or violations of their rights under the GDPR or applicable local law:

- in accordance with the complaints procedure set forth in the MOL Group Code of Ethics and Business Conduct via the Speak-up! system [https://mol.hu/hu/molrol/etika-esmegfeleles/etika/];
- with MOL Group Data Protection Officer on the email address set out in Article 15.1 of this Summary or the competent Local Data Protection Officer on the email address set out in Article 15.2 of this Summary;
- in case of client data Processing, Data Subjects may further file a complaint with the local contact point of the MOL Group Company concerned;
- any Data Breach can be reported via databreach@mol.hu email address.

If MOL does not take action on the complaint of the Data Subject, the Data Subject has the right to file a complaint to the competent Court or the competent Supervisory Authority in accordance with the Article 9.7-9.8 of this Summary.

If MOL considers that the Data Subject's complaint is justified, MOL will:

- comply with the Data Subject's request (if the Data Subject has made such a request);
- modify or terminate the Processing;

- take other necessary measures (for example amending or supplementing the privacy notice).

Article 20 – Legal issues

20.1 General Provisions

Any Processing by a MOL Group Company of Personal Data shall be governed by applicable local laws. If a MOL Group Company becomes aware that the applicable local law is in conflict with a provision of the BCR, the MOL Group Company shall proceed in accordance with Article 23 of this Summary.

Data Subjects keep their own rights and remedies as available in their local jurisdictions. Local government authorities having jurisdiction over the relevant matters shall maintain their authority.

20.2 Law applicable

The BCR shall be governed by and interpreted in accordance with the GDPR and applicable local laws. The BCR shall apply only where it provides supplemental protection for Personal Data. Where applicable local laws provide more protection than the BCR, local laws shall apply. Where the BCR provides more protection than the applicable local laws or provides additional safeguards, rights or remedies for the Data Subjects, the BCR shall apply.

20.3 Lead Supervisory Authority and cooperation with the Supervisory Authorities

The Hungarian Data Protection Authority is the lead supervisory authority under Article 56(1) of the GDPR. However, MOL Plc. and all MOL Group Companies shall co-operate with and accept to be audited by the competent Supervisory Authorities and comply with its advice on any issue related to the BCR.

20.4 Jurisdiction under the BCR

Data Subjects can choose to lodge a complaint either against the MOL Group Company or against MOL Plc. Data Subjects may lodge a complaint

- before competent Supervisory Authorities (choice before the Supervisory Authority in the Member State of his habitual residence, place of work or place of the alleged infringement) and
- before the competent court of the EU Member States (choice for the Data Subject to act before the courts where the data controller or data processor has an establishment or where the Data Subject has his or her habitual residence).

20.5 BCR enforceable against MOL Plc.

Without prejudice to Article 20.4 of this Summary, any rights or remedies (including third-party beneficiary rights) granted to Data Subjects under the BCR are enforceable against MOL Plc. either.

20.6 Liability, available remedies, limitation of damages and burden of proof

MOL Plc. shall be liable for material and non-material damages suffered by a Data Subject resulting from the violation of the BCR.

MOL Plc. as the Headquarters shall be liable for any breaches of the BCR by any MOL Group Company concerned not established in the EU and shall take the necessary action to remedy the acts of such MOL Group Company (including paying compensations to the Data Subjects). MOL Plc. shall be exempt from that liability, in whole or in part, only if it proves that the concerned MOL Group Company is not responsible for the event giving rise to the damage.

In accordance with the above, it is highlighted that MOL Plc. has the burden of proof to demonstrate that any MOL Group Company outside the EU is not liable for any violation of the rules, which has resulted in the Data Subject claiming damages. If MOL Plc. can prove that the MOL Group Company outside the EU is not responsible for the event giving rise to the damage, it may discharge itself from any responsibility.

Article 21 – Sanctions for non-compliance

[…]

Article 22 – Conflicts between the BCR and applicable local law and obligations in case of access by authorities

22.1 Conflict of law when transferring Personal Data

Where a legal requirement to transfer Personal Data conflicts with EU law or the laws of the Member States of the EEA, the transfer requires the prior approval of the MOL Group Data Protection Officer.

22.2 Conflict between the BCR and the applicable local law

In all other cases, where there is a conflict between the applicable local law and the BCR, the relevant Employee responsible for data protection shall consult with the local legal department which may escalate the issue to the MOL Group Data Protection Officer via MOL Plc.

22.3 New conflicting legal requirements

The relevant local legal department via MOL Plc. Legal Department shall promptly inform the MOL Group Data Protection Officer of any new legal requirement that may interfere with a MOL Group Company's ability to comply with the BCR.

22.4 Conflict resolution

Under the Article 22.1, 22.2 and 22.3, the MOL Plc. will evaluate the legal requirements in accordance with the essence of the fundamental rights and freedoms and do not exceed what is necessary and proportionate in a democratic society to safeguard one of the objectives listed in Article 23(1) of GDPR.

Based on this assessment, if the MOL Plc. finds that these legal requirements have a substantial adverse effect on the guarantees provided by the BCR, the MOL Plc. (or MOL Group Company) shall implement measures to protect the rights and freedoms of the Data Subjects.

The MOL Plc. shall suspend the data transfer to the given MOL Group Company (or shall terminate the remote access of its employees), if it considers that no appropriate safeguards for such transfer can be ensured.

22.5. Obligations of the MOL Group Companies in case of access by public authorities

The MOL Group Company shall notify the MOL Plc. and, where possible, the Data Subject promptly (if necessary with the help of the MOL Plc.) if they

- receive a legally binding request from a public authority, including judicial authorities, under the laws of the third country for the disclosure of Personal Data; such notification shall include information about the Personal Data requested, the requesting authority, the legal basis for the request and the response provided; or
- becomes aware of any direct access by public authorities to Personal Data in accordance with the laws of the third country; such notification shall include all information available to the MOL Group Company.

If the MOL Group Company is prohibited from notifying the MOL Plc. and/or the Data Subject under the laws of the third country, the MOL Group Company shall use its best efforts to obtain a waiver of the prohibition, with a view to communicating as much information as possible, as soon as possible. The MOL Group Company shall document its best efforts in order to be able to demonstrate them on request of the MOL Plc.

Where permissible under the laws of the third country, if the MOL Group Company is prohibited from notifying the MOL Plc. and/or the Data Subject, the MOL Group Company shall notify the MOL Plc. by 31 January each year of the authorities requests received in the previous year, with as much relevant information as possible (in particular, number of requests, type of data requested, requesting authority/ies, whether requests have been challenged and the outcome of such challenges).

The MOL Group Company shall review the legality of the request for disclosure, in particular whether it remains within the powers granted to the requesting public authority, and to challenge the request if, after careful assessment, it concludes that there are reasonable grounds to consider that the request is unlawful under the laws of the third country, applicable obligations under international law and principles of international comity. The MOL Group Company shall, under the same conditions, pursue possibilities of appeal. When challenging a request, the MOL Group Company shall seek interim measures with a view to suspending the effects of the request until the competent judicial authority has decided on its merits. It shall not disclose the personal data requested until required to do so under the applicable procedural rules.

The MOL Group Company shall document its legal assessment and any challenge to the request for disclosure and, to the extent permissible under the laws of the third country, make the documentation available to the MOL Plc. It shall also make it available to the competent Supervisory Authority on request.

The MOL Group Company shall provide the minimum amount of information permissible when responding to a request for disclosure, based on a reasonable interpretation of the request. In any case, the transfers of personal data by any MOL Group Company to any public authority cannot be massive, disproportionate and indiscriminate in a manner that would go beyond what is necessary in a democratic society.

Article 23 – Changes to the BCR

[…]

Article 24 – Transition Periods

[…]

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