

Privacy Notice

on MOL Group Supply & Trading (“Supply&Trading”) processing activities of MOL Nyrt. (“MOL”), Moltrade - Mineralimpex Zrt. (“Moltrade”), SLOVNAFT, a.s. (“SLOVNAFT”), MOL Commodity Trading Slovakia s.r.o. (“MCT Slovakia”) and MOL Commodity Trading Kft. (“MCT”) [MOL, Moltrade and MCT collectively referred to as “MOL HU” and SLOVNAFT and MCT Slovakia collectively referred to as “SLOVNAFT SK”]

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
KYC: Group Supply & Trading regularly gets in touch with external counterparties, which, if new for Supply&Trading, must go through a KYC (Know Your Counterparty) process to clarify if a potential counterparty can be accepted for concluding future businesses. This process requires data collection from the parties of various nature	GDPR ¹ Art. 6 (1) (f) (legitimate interests pursued by the Controllers and the contracting entity/partner). Legitimate interest: to ease sanctions exposure of the Controllers and to ensure lawful and ethical business operation.	Considering the data requirement of KYC, in fact it is a Due Diligence process. <ul style="list-style-type: none"> • name • position • e-mail address • phone number Source of data: directly from the data subject.	5 years after receiving the data.	MOL, Moltrade, MCT, MCT Slovakia, SLOVNAFT are joint controllers.	None.
Data processing of foreign partners with purpose of invitation letter issuance (support in	GDPR Art. 6 (1) a) consent of the data subject	Such personal data of business partners as names, date of birth, passport number, position	Till the end of the visit.	MOL, Moltrade, MCT, MCT Slovakia, SLOVNAFT are joint controllers.	None.

¹ 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)

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
visa arrangement)		is received via email and stored on a company server in a secured folder. This data is needed to ensure travelling of business partners to Hungary. Source of data: directly from the data subject.			
<p>Data processing relating to contract proposals or receipt of requests for proposals by the Controllers</p> <p>This processing operation involves processing of the contact details of contacts, representatives and employees of the entities receiving proposals from, as well as partners sending requests for proposals to the Controllers.</p> <p>Filing system: SAP, CRM, Navision, Outlook system, company computers /</p>	<p>GDPR Art. 6 (1) (f) (legitimate interests pursued by the Controllers and the contracting entity/partner receiving their proposal).</p> <p>Legitimate interest: assessment of proposal/request for proposals received from partner, managing proposals, successful and effective conduct of contractual negotiations, preparation of relevant contracts.</p>	<p>Name, position, email address, phone number of the relevant contact on contractual matters, representative or employee acting as representative; in case of persons authorised to sign for the company, including the specimen signature, name, registered seat, bank account and tax identification number of the organisation (company) represented.</p> <p>Source of data: the entity receiving the proposal from the Controllers and</p>	<p>5 years (Art. 6.22 (1) of Act V of 2013 on the Civil Code (“CC”)) from the date of termination of the contractual relationship if a contract is concluded based on the proposal; from the date of receipt of the contract proposal or the date of express rejection of the proposal in other cases; from the date of last communication in the absence of proposal (for example, no proposal is submitted based on the request for proposals), given that civil claims shall lapse after 5 years.</p>	<p>MOL, Moltrade, MCT, MCT Slovakia, SLOVNAFT are joint controllers.</p>	<p>MOL GBS Magyarország Kft. (registered office: 1039 Budapest, Szent István u. 14) kereskedelem@mol.hu - master data processing.</p> <p>MOL GBS Slovakia, s. r. o., Vlčie hrdlo 1, 824 12 Bratislava Slovak Republic, ID No.: 31 399 134 – professional support.</p> <p>MOL IT & Digital GBS Magyarország Kft. itu@mol.hu (HU-1117 Budapest, Budafoki út 79.) and Axiom</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
servers, e-bid system, e-LDA.		the contracting entity.	If no contract is concluded, the personal data are stored for 3 years.		<p>Consulting Ltd. (Cyprus, 2107 Nicosia, 21 Academias Avenue) – providing IT and hosting services closely related to the processing.</p> <p>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet Registered seat: H-2724 Újlengyel, Kossuth utca 136 CRN: 13-02-051119 Phone number: +36 1 217 6426; +36 1 323 2133 email address: info@melodiak.hu – professional support.</p>
<p>Credit rating</p> <p>Filing system: CRM, SAP, Outlook system, company computers / servers.</p>	<p>GDPR Art. 6 (1) f) (legitimate interests pursued by MOL, MCT, SLOVNAFT, Moltrade).</p> <p>Legitimate interest: checking credit lines of potential contractual partners and bidders to conclude contracts with creditworthy partners.</p>	<p>Contracting partner data and related contact details accessed during the credit line assessment.</p> <p>Source of data: credit rating partners of MOL, MCT, Moltrade, SLOVNAFT (credit insurer, company information provider, public database and internal data).</p>	<p>Concerning the enforcement of civil claims and fulfilment of obligations: 5 years (CC Art. 6.22 (1)) from the date of termination of the contractual relationship if a contract is concluded based on credit line assessment; from the date of credit line assessment, given that civil claims shall</p>	<p>MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT are joint controllers.</p> <p>Other recipients:</p> <p>Atradius Crédito y Caución S.A. de Seguros y Reaseguros Magyarországi Fióktelepe – credit insurance services</p>	<p>MOL GBS Magyarország Kft. 1039 Budapest, Szent István u. 14. kereskedelem@mol.hu - IT system operation, credit line checking.</p> <p>MOL GBS Slovakia, s. r. o., Vlčie hrdlo 1, 824 12 Bratislava</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
			<p>lapse after 5 years.</p> <p>If processing of these data is necessary for compliance with tax obligations of MOL MCT, Moltrade, SLOVNAFT data shall be processed for 5 years from the last day of the calendar year when tax return, data supply or reporting should be submitted or in the absence of tax return, data supply or reporting, the tax should have been paid (Art. 78 (3), 202 (1)).</p> <p>If these data are necessary for compliance with accounting obligations of MOL, MCT, Moltrade, SLOVNAFT in order to retain accounting records, these shall be retained for 8 years (AA Art. 168-169).</p>	<p>Registered seat: H-1117 Budapest Fehérvári út 50-52 CRN: 01-17-000324 Phone number: + 36 1 382 7590 email address: info-hu@atradius.com</p> <p>Bisnode D&B Magyarország Információ Szolgáltató Korlátolt Felelősségű Társaság 1093 Budapest, Közraktár utca 30-32.</p> <p>Crefoport s.r.o. Na Harfě 337/3 190 00 Praha 9, Česká Republika www.crefoport.cz</p> <p>FinStat s.r.o. Andreja Plávku 4 Bratislava 811 06, Slovakia www.finstat.sk</p>	<p>Slovak Republic, ID No.: 31 399 134 - IT system operation, credit line checking.</p> <p>MOL IT & Digital GBS Magyarország Kft. itu@mol.hu (HU-1117 Budapest, Budafoki út 79.) and Axiom Consulting Ltd. (Cyprus, 2107 Nicosia, 21 Academias Avenue) – providing IT and hosting services closely related to the processing.</p> <p>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet Registered seat: H-2724 Újlengyel, Kossuth utca 136 CRN: 13-02-051119 Phone number: +36 1 217 6426; +36 1 323 2133 email address: info@melodiak.hu – professional support.</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
					<p>MOL IT & Digital GBS Kft. (székhely: 1117 Budapest, Budafoki út 59., e-mail cím: ITU@mol.hu) – providing IT and hosting services closely related to the processing.</p> <hr/> <p>Cerved Group S.p.A. - Via dell'Unione Europea n. 6/A-6/B - 20097 San Donato Milanese (MI) - Numero Verde 800 029 029 info@cerved.com – credit report information provider.</p>
<p>Credit insurance An insurance service provided by professional credit insurers to cover payment obligations of customers in case of non-payment. In this process company data should be provided to credit insurers.</p>	<p>GDPR Art. 6 (1) f) (legitimate interests pursued by MOL, MCT, Moltrade, SLOVNAFT).</p> <p>Legitimate interest: to protect the Controllers' business interest by covering payment obligations of customers in case of non-payment.</p>	<p>Contracting partner data and related contact details accessed during the credit line assessment.</p> <p>Source of data: credit rating partners of MOL, MCT, Moltrade, SLOVNAFT (credit insurer, company information provider, public database and internal data).</p>	<p>Contracting partner data and related contact details accessed during the validity of insurance.</p>	<p>MOL, MCT, Moltrade, SLOVNAFT are joint controllers.</p> <p>Other recipients:</p> <p>Atradius Crédito y Caución S.A. de Seguros y Reaseguros Magyarországi Fióktelepe Székhely: 1117 Budapest, Fehérvári út 50-52.</p>	<p>None.</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
				<p>Crefoport s.r.o. Na Harfě 337/3 190 00 Praha 9, Česká Republika www.crefoport.cz</p> <p>FinStat s.r.o. Andreja Plávku 4 Bratislava 811 06, Slovakia www.finstat.sk</p>	
<p>Conclusion of contracts signed with MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT partners, performance of contracts, deal recaps.</p> <p>Filing system: SAP, CRM, Navision, Outlook system, company computers / servers, mobile phones.</p> <p>Paper-based contract electronic records, contract recorded in electronic format.</p>	<p>GDPR Art. 6 (1) (b) in case of parties who are not legal entities (performance of contracts in effect concluded by MOL, MCT, Moltrade, SLOVNAFT and its contractual partners).</p> <p>Conclusion and performance of contracts, alignment of business activities of the parties, exercising contractual rights and fulfilment of contractual obligations.</p> <p>In case of parties who are legal entities: GDPR Art. 6</p>	<p>Name, position, email address, phone number, fax number of the contact, representative, employee acting as representative of the customer who is a customer group member, name, registered seat, bank account and tax identification number of the organisation (company) represented as well as other details related to performance of the contract.</p> <p>Source of data: contractual partner / contact person of MOL,</p>	<p>MOL HU: Concerning the enforcement of civil claims and fulfilment of obligations: 5 years (CC Art. 6.22 (1)) from the date of termination of the contractual relationship if a contract is concluded based on credit line assessment; from the date of credit line assessment, given that civil claims shall lapse after 5 years.</p> <p>If processing of these data is necessary for compliance with tax obligations of MOL, MCT,</p>	<p>MOL, MCT, Moltrade, SLOVNAFT are the joint controllers.</p>	<p>MOL GBS Magyarország Kft., kereskedelem@mol.hu 1039 Budapest, Szent István u. 14.</p> <hr/> <p>– Book-keeping, audit, provision of tax advice, operation of MOL Internal Mail Processing Services (handling incoming and outgoing postal items).</p> <p>MOL GBS Slovakia, s. r. o., Vlčie hrdlo 1, 824 12 Bratislava Slovak Republic, ID No.: 31 399 134 – Book-keeping, audit, provision of tax advice,</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
	<p>(1) (f) (legitimate interests pursued by the Controllers and the contracting entity/partner receiving their proposal).</p> <p>Legitimate interest: Conclusion and performance of contracts, alignment of business activities of the parties, exercising contractual rights and fulfilment of contractual obligations.</p>	<p>MCT, Moltrade, SLOVNAFT. In case of customers who are customer group members: the representative of the customer group.</p>	<p>Moltrade data shall be processed for 5 years from the last day of the calendar year when tax return, data supply or reporting should be submitted or in the absence of tax return, data supply or reporting, the tax should have been paid (Art. 78 (3), 202 (1)).</p> <p>If these data are necessary for compliance with accounting obligations of MOL, MCT, MCT Slovakia, Moltrade and SLOVNAFT in order to retain accounting records, these shall be retained for 8 years (AA Art. 168-169).</p> <p>SLOVNAFT SK: Personal data are stored for the duration of the contractual relationship and thereafter for archiving purposes for at the most 10 years as from the expiry of the contract.</p>		<p>operation of SLOVNAFT Internal Mail Processing Services (handling incoming and outgoing postal items).</p> <hr/> <p>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet Registered seat: H-2724 Újlengyel, Kossuth utca 136 CRN: 13-02-051119 Phone number: +36 1 217 6426; +36 1 323 2133 email address: info@melodiak.hu – trainees employed by the company work in S&T department in supporting functions, like supporting deal execution. - activities needed to register contracts into various company systems.</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
<p>Claims management, debt collection</p> <p><u>Filing system:</u> SAP, records and registers of external debt collectors, company computers / servers, outlook system.</p>	<p>GDPR Art. 6 (1)f) (legitimate interests pursued by MOL, MCT, Moltrade, SLOVNAFT and the organisation represented by the person who is making an inquiry). Legitimate interest: management of debts owed to contractual partners within own competence, and/or with the involvement of external debt collectors, lawyers.</p>	<p>Name, position, email address, phone number of the relevant contact on contractual matters, representative or employee acting as representative; name, registered seat, of the organisation (company) represented.</p> <p>Source of data: the Customer.</p>	<p>MOL HU: Concerning the enforcement of civil claims and fulfilment of obligations: 5 years (CC Art. 6.22 (1)) from the date of termination of the contractual relationship established with the Customer, given that civil claims shall lapse after 5 years. If processing of these data is necessary for compliance with tax obligations of MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT, data shall be processed for 5 years from the last day of the calendar year when tax return, data supply or reporting should be submitted or in the absence of tax return, data supply or reporting, the tax should have been paid (Art. 78 (3), 202 (1)). If these data are necessary for compliance with</p>	<p>MOL, MCT, Moltrade, SLOVNAFT are the joint controllers.</p> <p>Other recipients:</p> <p>Atradius Collections B.V. Karolinská 661/4 186 00 Praha 8 – Karlín, Česká republika</p> <p>Intrum Slovakia s.r.o. Mýtna 48, Blumental offices I, 811 07 Bratislava, Slovakia www.intrum.sk</p> <p>Credit Control Management Kft. – 1133 Budapest, Váci út 110, info@creditcontroll.hu</p> <p>Céginformáció.hu Kft. - 1087 Budapest, Könyves Kálmán körút 76. info@ceginformacio.hu</p> <p>MULTI-KOLLEKTOR Pénzügyi és Marketing Tanácsadó Kft. - 1033 Budapest, Hévízi út</p>	<p>MOL GBS Magyarország Kft., 1039 Budapest, Szent István u. 14. kereskedelem@mol.hu</p> <p>- Book-keeping, audit, provision of tax advice, operation of MOL Internal Mail Processing Services (handling incoming and outgoing postal items).</p> <hr/> <p>MOL GBS Slovakia, s. r. o., Vlčie hrdlo 1, 824 12 Bratislava Slovak Republic, ID No.: 31 399 134</p> <p>- Book-keeping, audit, provision of tax advice, operation of SLOVNAFT Internal Mail Processing Services (handling incoming and outgoing postal items).</p> <p>MOL IT & Digital GBS Magyarország Kft. itu@mol.hu</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
			<p>accounting obligations of MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT in order to retain accounting records, these shall be retained for 8 years (AA Art. 168-169).</p> <p>SLOVNAFT SK: Personal data are stored for at the most 10 years following the end of tax period in which the contractual relationship with the counterparty ended.</p>	<p>6/E. iroda@multikollektor.hu</p> <p>DEBT-INVEST Pénzügyi Szolgáltató és Befektetési Zrt. 1117 Budapest, Hauszmann Alajos utca 3/a; debt@debt.hu</p> <p>PAGAMENTO Kereskedelmi és Szolgáltató Kft. 1022 Budapest, Bimbó u 87. a.</p> <p>EX-ID Zrt. 1133 Budapest, Árboc utca 6. 1. em. kintlevosegkezeles@exid.hu</p> <p>Legal representatives (attorney), notaries.</p>	<p>(HU-1117 Budapest, Budafoki út 79.) and Axiom Consulting Ltd. (Cyprus, 2107 Nicosia, 21 Academias Avenue) – providing IT and hosting services closely related to the processing.</p> <p>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet Registered seat: H-2724 Újlengyel, Kossuth utca 136 CRN: 13-02-051119 Phone number: +36 1 217 6426; +36 1 323 2133 email address: info@melodiak.hu – professional support.</p> <p>MOL IT & Digital GBS Kft. (registered seat: 1117 Budapest, Budafoki út 59., e-mail; ITU@mol.hu) – SAP system operation.</p>
Reference to the	GDPR Art. 6 (1) (f) (data)	Name and position,	The duration required by	MOL, MCT, Moltrade,	Meló-Diák Universitas

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
<p>Customer</p> <p>MOL, MCT, Moltrade, SLOVNAFT shall be entitled to list the Contract / share partner's contact data and its co-operation established with the Customer as reference, if expressly requested to do so by a third party within the framework of bidding, public procurement procedure, KYC process or during contractual negotiations. This requires that the Controllers are authorised to do so under the contract concluded with the Customer.</p>	<p>processing is necessary for the legitimate interests pursued by MOL, MCT, Moltrade, SLOVNAFT).</p> <p>Legitimate interests pursued by MOL, MCT, Moltrade, SLOVNAFT: the Company's business interests, tendering, public procurement procedure or contractual negotiations or KYC as part of successful procedure.</p>	<p>contact details of the Customer's representative/contact on contractual matters.</p>	<p>the relevant tendering, public procurement procedure or contractual negotiations.</p>	<p>SLOVNAFT are the joint controllers.</p>	<p>Szolgáltató Iskolaszövetkezet Registered seat: H-2724 Újlengyel, Kossuth utca 136 CRN: 13-02-051119 Phone number: +36 1 217 6426; +36 1 323 2133 email address: info@melodiak.hu</p> <p>– professional support - activities related to the collection and utilization of the references.</p>
<p>Communication, responding answering questions, data reconciliation, complaints management (excluding consumer complaints and product defect reports) in printed form or via</p>	<p>GDPR Art. 6 (1) (f) (data processing is necessary for the legitimate interests pursued by the Controllers and - in case of communication with the Customer who is a legal person - the Customer).</p>	<p>Data/company and contact data included in inquiries made by the Customer or other data subject, in printed form or electronic exchange of messages, including data that appear in complaints (for example,</p>	<p>The Company shall retain data for 5 years (pursuant to Art. 6.22 (1) of Act V of 2013 on the Civil Code ("CC")) after the termination of the contract concluded with the Customer, or - in the</p>	<p>MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT are the joint controllers.</p>	<p>MOL GBS Magyarország Kft., 1039 Budapest, Szent István u. 14. kereskedelem@mol.hu - Book-keeping, audit, provision of tax advice, operation of MOL</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
<p>electronic mail exchange (email) relating to customers (“Customer”, “Customers”) and data subjects who are not Customers.</p> <p>Filing system: CRM system, Outlook, server, corporate computers, telephones.</p>	<p>Legitimate interests: successful communication with the Customer or other data subject, answering questions, data reconciliation, complaints management.</p> <p>GDPR Art. 6 (1) (b) - if communication, answering questions, data reconciliation, complaints management is necessary for the performance of the contract concluded with the Customer who is a natural person (individual entrepreneur) or in order to take steps at the request of the data subject prior to entering into the contract.</p>	<p>reason and type of complaint), (company) name and contact details of the Customer or other data subject (for example, individual entrepreneur submitting a bid, but not contracted) as well as the name and position of the contact of the Customer who is a legal person (for proper addressing), including phone number, fax number, email address and additional data necessary for contractual performance (for example: dates of availability relating to performance).</p> <p>Source of data: the Customer or other data subject.</p>	<p>absence of such contract - from the date of receipt of the contract proposal or the date of express rejection of the proposal, or from the date of the last communication in the absence of proposal (for example, no proposal is submitted based on the request for proposals), or in case of inquiry or complaint by other data subject, with regard to the enforcement of any civil claims of the Controllers or defence against any civil claims of the data subjects.</p>		<p>Internal Mail Processing Services (handling incoming and outgoing postal items).</p> <p>MOL GBS Slovakia, s. r. o., Vlčie hrdlo 1, 824 12 Bratislava Slovak Republic, ID No.: 31 399 134</p> <ul style="list-style-type: none"> - Book-keeping, audit, provision of tax advice, operation of Slovnaft Internal Mail Processing Services (handling incoming and outgoing postal items). <p>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet (Seat: H-2724 Újlengyel, Kossuth utca 136 CRN: 13-02-051119 Phone number: +36 1 217 6426; +36 1 323 2133 email address: info@melodiak.hu)</p> <ul style="list-style-type: none"> - professional support - activities related to the

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
					consumer complaints and related activities.
<p>Order/Nomination placement Orders/Nominations can be communicated via phone, email.</p> <p>Filing system: Outlook, corporate computers/servers.</p>	<p>GDPR Art. 6 (1) (f) (data processing is necessary for the legitimate interests pursued by MOL, MCT, Moltrade, SLOVNAFT and the client if it is a legal person).</p> <p>Legitimate interest: execution of orders, strengthening the business relations between MOL, MCT, Moltrade, SLOVNAFT and the client.</p> <p>GDPR Art. 6 (1) (b) - if order placement is necessary for the performance of the contract concluded with the Customer who is a natural person (individual entrepreneur) or in order to take steps at the request of the data subject prior to entering into the contract.</p>	<p>Data stated in the client order, such as (company) name, address of the client, in case of client who is a legal person, name and position of contact (for proper addressing), phone number, fax number and email address, the type and volume of product(s) ordered, the client's bank account number and ship-to address.</p> <p>Source of data: the client.</p>	<p>The Company shall retain order placement-related data for 5 years (pursuant to CC Art. 6:22) from the date of order placement for the enforcement of any MOL, MCT, Moltrade, SLOVNAFT claims and defence against any civil claims of data subjects.</p>	<p>The Company and MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT are the joint controllers.</p>	<p>MOL GBS Magyarország Kft., 1039 Budapest, Szent István u. 14. kereskedelem@mol.hu MOL GBS Slovakia, s. r. o., Vlčie hrdlo 1, 824 12 Bratislava Slovak Republic, ID No.: 31 399 134</p> <ul style="list-style-type: none"> - Book-keeping, audit, provision of tax advice, operation of MOL Internal Mail Processing Services (handling incoming and outgoing postal items). <p>MOL GBS Slovakia, s. r. o., Vlčie hrdlo 1, 824 12 Bratislava Slovak Republic, ID No.: 31 399 134</p> <ul style="list-style-type: none"> - Book-keeping, audit, provision of tax advice, operation of Slovnaft Internal Mail Processing Services (handling incoming and outgoing postal items).

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
					<p>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet (address: H-2724 Újlengyel, Kossuth utca 136, email address: info@melodiak.hu).</p> <p>– professional support - activities related to processing of orders/nominations.</p>
<p>Reconciliation related to releasing credit blocks, financial feasibility assessment of orders</p>	<p>GDPR Art. 6 (1) (f) (data processing is necessary for the legitimate interests pursued by MOL, MCT, Moltrade, SLOVNAFT).</p> <p>Legitimate interest: enforcement of civil claims, protection of business interests of MOL, MCT, Moltrade, SLOVNAFT and its protection against losses.</p>	<p>If the Customer is a legal person: name and position of the Customer's contact (for proper addressing), phone number, fax number and email address, bank account number, client name of the Customer represented, order/nomination details and feasibility.</p> <p>Source of data: the Customer.</p>	<p>5 years (pursuant to CC Art. 6:22) from the date of termination of the civil law contract concluded by MOL, MCT, Moltrade, SLOVNAFT and the Customer/completion date of the test for the enforcement of any MOL, MCT, Moltrade, SLOVNAFT Claims and defence against any civil claims of data subjects.</p>	<p>MOL, MCT, Moltrade, SLOVNAFT are joint controllers.</p>	<p>MOL GBS Magyarország Kft., 1039 Budapest, Szent István u. 14. kereskedelem@mol.hu</p> <p>- Book-keeping, audit, provision of tax advice, operation of MOL Internal Mail Processing Services (handling incoming and outgoing postal items).</p> <p>MOL GBS Slovakia, s. r. o., Vlčie hrdlo 1, 824 12 Bratislava Slovak Republic, ID No.: 31 399 134 - Book-keeping, audit,</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
					<p>provision of tax advice, operation of Slovnaft Internal Mail Processing Services (handling incoming and outgoing postal items).</p> <p>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet Registered seat: H-2724 Újlengyel, Kossuth utca 136 CRN: 13-02-051119 Phone number: +36 1 217 6426; +36 1 323 2133 email address: info@melodiak.hu – professional support - activities related to processing of orders.</p>
<p>Market research and satisfaction survey for the purpose of developing the controllers' products and services.</p>	<p>GDPR Art. 6 (1) (f) (data processing is necessary for the legitimate interests pursued by MOL, MCT, Moltrade, SLOVNAFT).</p> <p>Legitimate interest: developing controllers' products, services and customer satisfaction.</p>	<p>Name, address, e-mail address, telephone number, card number, card usage data, data recorded or generated during market research.</p> <p>The specific data are determined in the privacy notice relating to a given</p>	<p>The Controllers retain e-mails until the termination of the contract concluded with a particular Customer or until prohibition by the data subject, i.e. until she or he exercises his or her right to object, as provided for in Article 21, paragraphs</p>	<p>MOL, MCT, Moltrade, SLOVNAFT are joint controllers.</p>	<p>MOL IT & Digital GBS Magyarország Kft. (HU-1117 Budapest, Budafoki út 79.) and Axiom Consulting Ltd. (Cyprus, 2107 Nicosia, 21 Academias Avenue) itu@mol.hu – providing IT and hosting services closely related to the processing.</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
		<p>campaign.</p> <p>Source of data: obtained from the data subject.</p>	(2)–(3) of GDPR (whichever is earlier).		<p>Details of campaigns and any additional processor used will be specified on the www.multipont.hu/kutatas website.</p>
<p>Sending general marketing messages, information materials to Customers via email about news and events related to MOL, MCT, Moltrade, SLOVNAFT products and services, invitations to MOL, MCT, Moltrade, SLOVNAFT - related events</p> <p>Above general marketing messages and information materials of MOL, MCT, Moltrade, SLOVNAFT contain only information related to products and services offered, news and events related to MOL, MCT, Moltrade SLOVNAFT and do not discuss information concerning third parties, their</p>	<p>GDPR Art. 6 (1) (f) (data processing is necessary for the legitimate interests pursued by MOL, MCT, Moltrade, SLOVNAFT and the Customer).</p> <p>Legitimate interest: distribution of general marketing messages and information materials of MOL, MCT, Moltrade, SLOVNAFT in order to increase awareness of MOL, MCT, Moltrade, SLOVNAFT products and services, information about news and events related to MOL, MCT, Moltrade, SLOVNAFT invitation to events related to MOL, MCT, Moltrade, SLOVNAFT that could be beneficial to the</p>	<p>Name and position of the Customer - or if the Customer who is a legal person, its contact (for proper addressing) and email address.</p> <p>Source of data: MOL, MCT, Moltrade, SLOVNAFT.</p>	<p>Until termination of the contractual relationship established with the Customer or the right to object is exercised by the data subject – whichever is earlier. In the event of the data subject’s objection and the Customers are legal persons, general marketing messages and information materials, invitations are sent to other contacts or other contact details of the Customer as agreed and described in the contract concluded therewith.</p>	<p>The Company and MOL, MCT, Moltrade, SLOVNAFT are the joint controllers.</p>	<p>None.</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
products or services.	Customer (for example, information on new products, services or events of interest).				
<p>Prevention, detection and investigation of whistle-blowing related frauds and abuse, investigation of conduct violating MOL Group Code of Ethics and Business Conduct and its Business Partner Code of Ethics</p> <p>Documents governing prevention and investigation of frauds and abuse, namely MOL Group Code of Ethics and Business Conduct, Business Partner Code of Ethics, Ethics Council Rules of Procedure (“Code of Ethics”) can be found here: https://mol.hu/hu/molrol/ethics-es-compliant/ethics/.</p>	<p>GDPR Art. 6 (1) (f) (data processing is necessary for the legitimate interests pursued by the Company).</p> <p>Legitimate interest: prevention, detection and establishment of personal liability for misconduct jeopardising assets, business secrets, intellectual properties and business reputation of the Company as well as an appropriate, fear and retribution-free working environment built on mutual trust.</p>	All personal data listed under the purpose of processing above.	<p>Should the investigation find the report unsubstantiated or find that no further measures are required, data related to the specific case shall be deleted within 60 days after closing the investigation concerned.</p> <p>If measures are taken based on investigation findings - including measures taken based on legal procedures or disciplinary action initiated against the whistle-blower -, data related to the specific case shall be handled in the employer’s whistle-blowing system until conclusion of the proceedings initiated based on the report by final decision.</p> <p>In the case that a special law/act regulates a longer</p>	<p>The Company and MOL, MCT, Moltrade, SLOVNAFT are joint controllers.</p> <p>Should the Company initiate an ethics investigation, members of the Ethics Council can access data required to conduct the investigation.</p> <p>Should the Company initiate procedures to prevent, detect and investigate fraud and misconduct, employees of Regional Security, Group Corporate Security and Internal Audit shall have access to data required to conduct the investigation.</p> <p>Should the investigation conducted concern other MOL Group Members and the company concerned enforce a legal claim based on investigation findings,</p>	None.

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
			period, it is processed according to the special regulation.	the HR and Legal organisations of the company concerned, the Group HR and Group Legal organisations shall have access to relevant data.	
<p>For the purpose of legal claims associated with contractual relationship established by Supply&Trading with the Customers, as well as effective defence in legal disputes or official proceedings</p> <p>Pursuant to GDPR Art. 17 (3), this could, for example, be defence against contract-related legal claims potentially initiated by the Customers and in official proceedings.</p>	<p>GDPR Art. 6 (1) (f) (data processing is necessary for the legitimate interests pursued by the Controllers).</p> <p>Legitimate interest: enforcement of claims by the Controllers, effective defence against legal claims potentially initiated by the Customers and in official proceedings.</p>	<p>Name, address, email address, phone number and other data necessary for defence against legal claims, court or administrative proceedings (for example, data supplied by the data subject as part of the claim concerned, evidence produced and details of the claim enforced against or by the data subject).</p> <p>Source of data: recorded data supplied by the data subject.</p>	<p>The Controllers shall retain data for 5 years (CC Art. 6.22 (1)) from the date of termination of the contractual relationship if a contract is concluded based on the proposal; from the date of receipt of the contract proposal or the date of express rejection of the proposal in other cases; from the date of last communication in the absence of proposal (for example, no proposal is submitted based on the request for proposals) for the enforcement of any civil claims of the Controllers and defence against any civil claims of the data subject.</p>	<p>The Company and MOL, MCT, Moltrade, SLOVNAFT are joint controllers.</p> <p>Legal representatives (attorney), notaries.</p>	None.

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
			<p>Should processing of the personal data be necessary for defence in court or administrative proceedings initiated by the Customer or other data subject, or for the purposes of the legitimate interests pursued by the Controllers, the Controllers shall, based on their own legitimate interest (GDPR Art. 6 (1.f)), be entitled to process the personal data concerned until completion of the proceedings by a final decision or enforcement of the legitimate interests by other means (for example, out-of-court settlement) and - if retention of the written or electronic document containing such data is not necessary - make extracts of the document concerned within the scope of data required.</p>		

Name, registered seat, phone number, website (where the privacy notices are accessible) and email address of the Controllers:

MOL Nyrt. (registered seat: H-1117 Budapest, Október huszonharmadika u. 18, Hungary, phone number: +36-1-211-1000, website: <https://mol.hu/hu/kapcsolat/>, email address: polymersales@mol.hu)

MCT (registered seat: 1117 Budapest, Október huszonharmadika utca 18, Hungary)

Moltrade (registered seat: 1117 Budapest, Október huszonharmadika utca 18, Hungary)

MCT Slovakia (registered seat: Vlčie hrdlo 1, 824 12, Bratislava, Slovakia)

SLOVNAFT, a.s., (registered seat: Vlčie hrdlo 1, 824 12, Bratislava, Slovakia, court registration: Commercial register of the District Court Bratislava I, Section: Sa, Insert No.: 426/B, company reg No.: 31 322 832, website: www.slovnaft.sk)

The above Controllers are considered to be joint controllers, and in this context, they shall jointly determine the purposes and means of the processing and be liable for the processing. The Controllers have this joint Privacy Notice. The data subjects may contact MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT to exercise their rights, and the data subjects may exercise their rights against MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT.

In addition to the above, under Article 6(1)(f) of GDPR (based on the legitimate interest of the Company), the Company uses the services of its lawyer partners to manage and successfully exercise its claims vis-à-vis its contractual partners, and transfers the required personal data to such lawyers for this purpose (including, in particular: the details of its contractual partners and of their contact persons and representatives as specified in the contract, details of the claims), furthermore, the Company engages service providers – as mentioned above – to deal with credit rating, credit insurance and claims management. Such lawyers and service providers act as independent controllers in accordance with the provisions of their own privacy notices. At the request of the data subject, the Company shall provide more information on the lawyer partner and service providers involved in a particular data processing operation, as well as the contact details and activities of these lawyer and the data processed in connection therewith.

Contact person(s) of the Controllers:

MOL Nyrt., Moltrade - email address: Kereskedelem@MOL.hu

SLOVNAFT - email address: tradingslovnaftoperations@slovnaft.sk

Name and contact details of data protection officer(s) of the Controllers:

MOL Nyrt., MCT, MCT Slovakia, Moltrade - email address: dpo@mol.hu

SLOVNAFT – email address: zodpovednaosoba@slovnaft.sk

Persons from below departments of MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT are authorised to access data:

- **Communication, responding answering questions, data reconciliation, complaints management (excluding consumer complaints and product defect reports) in printed form or via electronic mail exchange (email) relating to the Customers and data subjects who are not Customers:** S&T, Group DS Customer Care, GBS Masterdata Management, IT HelpDesk, Accounting, Credit Management
- **Order/nomination placement:** S&T, Customer Service, GBS
- **Reconciliation related to releasing credit blocks, financial feasibility assessment of orders:**
S&T, Customer Service, GBS, Group Credit Management
- **Conducting customer satisfaction surveys:** S&T, Group DS Customer Care, external survey company
- **Sending general marketing messages, information materials to Customers via email about news and events related to MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT products and services, invitations to MOL, MCT, MCT Slovakia, Moltrade, SLOVNAFT - related events:** Supply & Trading
- **For the purpose of enforcement of data retention-related legal claims associated with communication established by Supply & Trading, as well as effective defence in legal disputes or official proceedings:** S&T, GBS, Customer Service and competent employees of the Legal Department for the purpose of legal assistance for the enforcement of claims and defence in court and administrative proceedings.

Name, registered seat, telephone number, website (where the privacy notices are available) and email address of Processors:

- as listed above

Contact person(s) of the Processors:

- as listed above

Privacy Officers of the Processors:

MOL Group companies: dpo@mol.hu

Meló-Diák Universitas Szolgáltató Iskolaszövetkezet: adatvedelem@melodiak.hu

SLOVNAFT: zodpovednaosoba@slovnaft.sk

Cerved Group S.p.A. dpo@cerved.com

Axiom Consulting Ltd.: info@axiomc.com

GDPR_MOL GROUP SUPPLY&TRADING

Persons at the Processors who are authorised to access the data:

- **MOL GBS Magyarország Kft.:** dedicated colleagues and staff members
- **MOL IT & Digital GBS Magyarország Kft.:** dedicated colleagues and staff members
- **MOL GBS Slovakia, s. r. o.:** dedicated colleagues and staff members

- **Meló-Diák Universitas Szolgáltató Iskolaszövetkezet:** dedicated colleagues and staff members

- **Axiom Consulting Ltd.:** dedicated colleagues and staff members
- **Cerved Group S.p.A.** dedicated colleagues and staff members

Processing sensitive personal data for the purposes described in this Notice: no sensitive personal data are processed.

Transfer of personal data to a third country: no personal data are transferred to third country.

Data security measures:

Information Security Management System	To ensure the confidentiality, integrity and availability of organizational information by implementing policies, processes, process descriptions, organizational structures, software and hardware functions.
Physical access	To ensure physical asset protection containing MOL Group information.
Logical access	To ensure that only approved and authorized users have access to data used by MOL Group Companies.
Data access	To ensure that only authorized users of the systems have access to MOL Group Company data.
Data transfer/ storage/ erasure	To ensure that MOL Group Company's corporate information is not transmitted, read, modified or erased by an unauthorized person while it is being transferred or stored. In addition, MOL Group company data must be deleted promptly when the purpose of processing ceases.
Confidentiality and integrity	To ensure that MOL Group's corporate data is kept confidential and up-to-date, also preserves integrity.
Availability	To ensure that MOL Group Company data is protected against accidental destruction or loss and, in the event of such an event, access to, and recovery of, relevant MOL Group Company Data is on time.
Separation of data	To ensure that MOL Group Company data is handled separately from other client data.

Incident management	In the event of any breach of the MOL Group Corporate Information, the effect of the breach will be minimized and the owners of the MOL Group Company Information will be notified immediately.
Audit	To ensure that the processor periodically tests, examines and evaluates the effectiveness of the technical and organizational measures outlined above.

Your data processing rights:

The GDPR contains in detail your data protection rights, your possibilities of seeking a legal remedy and the restrictions thereof (in in particular, GDPR Art. 15, 16, 17, 18, 19, 21, 22, 77, 78, 79, 79 and 82). 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. Find a summary of the most important provisions below.

As part of providing information, the Company draws your particular attention to the following:

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 Company. The Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing.

If you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Right to information:

If the Company processes your personal data it must provide you information concerning the data relating to you – even without your special request – including the main characteristics of the data processing just as the purpose, grounds and duration of control, the name and contact details of the Company and its representative, contact details of its data privacy officer, the recipients of the personal data, the legitimate interests of the Company 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); furthermore, if you are not the source of data, then the source of personal data and the categories of personal data concerned, in the case if you do not yet have this information. The Company provides you this information by making this Privacy Notice available to you.

Right to access:

You have the right to obtain from the Company 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 you.

Upon your request the Company shall provide a copy of your personal data undergoing processing. For any additional copies you request, the Company may charge a reasonable administrative fee. If you make the request by electronic means, and, unless you request otherwise, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Right to rectification:

You have the right to obtain from the Company 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

Right to erasure:

You have the right to obtain from the Company the erasure of personal data concerning you without undue delay and the Company has the obligation to erase personal data without undue delay where certain conditions are met. Among other grounds the Company 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 Company is subject.

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

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- d) for the establishment, exercise or defence of legal claims.

Right to restriction of processing:

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

- a) you contest the accuracy of the personal data, for a period enabling the Company 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 Company 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 Company override your legitimate grounds.

Where processing has been restricted according to the above 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 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 Company before the restriction of processing requested by you 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 Company. The Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing.

If you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

How to exercise your rights:

The Company 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 Company shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you make the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by you.

If the Company does not take action on your request, the Company 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 (the National Authority for Data Protection and Freedom of Information; in Hungarian: 'Nemzeti Adatvédelmi és Információszabadság Hatóság'; abbreviated as 'NAIH'), in Slovak Republic: Republic Office for Personal Data Protection of the Slovak Republic/Úrad na ochranu osobných údajov Slovenskej republiky) and seeking a

judicial remedy. Address, telephone number, fax number, email address and website of the NAIH: 1055 Budapest, Falk Miksa utca 9-11., address: 1373 Budapest, Postafiók 9., Tel: +36 1 391 1400, +36 (30) 683-5969 or +36 (30) 549-6838, Fax: +36-1-391-1410, email: ugyfelszolgalat@naih.hu, website: <http://naih.hu/>. Address, telephone number, fax number, email address and website of the of the Office for Personal Data Protection of the Slovak Republic: Hraničná 12, 820 07 Bratislava 27, Tel: +421 /2/ 3231 3214, E-mail: statny.dozor@pdp.gov.sk , <https://dataprotection.gov.sk>.

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

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR. You can read about how to contact supervisory authorities within the EU here: https://edpb.europa.eu/about-edpb/board/members_hu. You shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning you. You shall further have the right to an effective judicial remedy where the competent supervisory authority does not handle your complaint or does not inform you within three months on the progress or outcome of the complaint lodged. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, you shall have the right to an effective judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company or its data controller or processor partner shall be brought before the courts of the Member State where the Company, the controller or the processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

Such litigation falls within the jurisdiction of the tribunal (in Hungarian: 'törvényszék') in Hungary. Information on the jurisdiction and contact details of the courts can be found on the following website: www.birosag.hu

If the court (tribunal) upholds the claim, it shall establish the fact of infringement and order the Company to terminate the unlawful data processing operation, to restore the lawfulness of the data processing and to take the action exactly defined for the assertion of the relevant data subject's interest and, if necessary, to award damages and damages. demand. The court (tribunal) may order the publication of its judgment by publishing the identification data of the Company if the judgment affects a wide range of persons or if the gravity of the offense occurred justifies its disclosure.