

Privacy Notice
on processing activities of MOL-LUB Ltd (“Company”) regarding the management of contractual offers, the conclusion and performance of commercial contracts, and related activities

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>Data processing relating to contract proposals or receipt of requests for proposals by the Company</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 Company.</p> <p>Filing system: Contract proposals are stored in electronic form at internal site of Sales organisation of the Company.</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>GDPR Art. 6 (1.f) (legitimate interests pursued by the Company and the contracting entity/partner receiving their proposal).</p> <p>Legitimate interest: assessment of proposal/request for proposals received from partner, managing</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 Company and the contracting entity.</p>	<p>Concerning the enforcement of civil claims and fulfilment of obligations: 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</p>	<p>None</p>	<p>MOL Magyarország Szolgáltató Központ Kft. (registered seat: 1039 Budapest, Szent István utca 14., email: LBesnyi@MOL.hu) –regarding negative credit proposal</p>

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	proposals, successful and effective conduct of contractual negotiations, preparation of relevant contracts.		proposals), given that civil claims shall lapse after 5 years.		
Credit rating Filing system: CRM, SAP	GDPR Art. 6 (1.f) (legitimate interests pursued by the Company). Legitimate interest: checking credit lines of potential contractual partners and bidders to conclude contracts with creditworthy partners.	Contracting partner data and related contact details accessed during the credit line assessment. Source of data: credit rating partners of the Company (credit insurer, company information provider, public database and internal data).	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. If processing of these data is necessary for compliance with tax obligations of the	None	MOL Magyarország Pénzügyi Szolgáltató Központ Kft. (registered seat: 1039 Budapest, Szent István utca 14., email: MFS@msc.hu) – regarding credit line assessment MOL Magyarország Informatikai Szolgáltató Kft (registered seat: H-1117 Budapest, Budafoki út 79., email address: ITU@mol.hu, company reg. number: 01-09-195458) – Operation of SAP, CRM systems, Fónix- systems.

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
			Company 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>Conclusion of wholesale contracts signed with partners of the Company, performance of contracts</p> <p>Filing system: SAP, CRM. Főnix</p>	<p>GDPR Art. 6 (1.b): in case of individual entrepreneur: performance of contracts in effect concluded by the Company 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</p>	<p>Name, position, email address, phone number of the relevant contact, representative, employee acting as representative, name, registered seat, bank account and tax identification number of the organisation (company) represented, other details related to performance of the contract.</p> <p>Source of data: contractual partner of</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 lapse after 5 years.	None	<p>MOL Magyarország Társasági Szolgáltatások Kft. (registered seat: H-1117 Budapest, Budafoki út 79,) –Operation of MOL internal Post</p> <p>MOL Magyarország Informatikai Szolgáltató Kft (registered seat: H-1117 Budapest, Budafoki út 79, email address: ITU@mol.hu, company reg. number: 01-09-195458) – Operation of SAP, CRM and Főnix 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>legal entities: GDPR Art. 6 (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>	the Company	If processing of these data is necessary for compliance with tax obligations of MOL Petrochemicals, 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>Claims management, debt collection</p> <p><u>Filing system:</u> SAP, E-Collect, records and registers of external debt collectors</p>	<p>GDPR Art. 6 (1.f) (legitimate interests pursued by MOL Petrochemicals and the organisation represented by the person who is making an inquiry).</p> <p>Legitimate interest: management of debts owed to contractual partners within own</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</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 established with the Customer, given that	The company's lawyer partners for the effective claim management.	<p>MOL Magyarország Pénzügyi Szolgáltató Központ Kft. (registered office: 1039 Budapest, Szent István utca 14., email address: MFS@msc.hu) –regarding credit classification, establishing line of credit, monitoring credit limit, evaluation of profits, collection of claims.</p>

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	<p>competence, and/or with the involvement of external debt collectors, lawyers</p> <p>Click here for the “balance-of-interest” test.</p>	Customer	<p>civil claims shall lapse after 5 years.</p> <p>If processing of these data is necessary for compliance with tax obligations of MOL Petrochemicals, 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 Petrochemicals, in order to retain accounting records, these shall be retained for 8 years (AA Art. 168-169)</p>		<p>The company’s claim management partners regarding the management of the company’s justifiably existing claims against the contracting parties.</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>Sending access for online surveys via email.</p> <p>Measurement of customer satisfaction and general market research for the innovation of our products and services.</p> <p>Privacy notices about the market research and information about the data processors can be reached on the MOL LUB Kft. website.</p>	<p>GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by MOL Petrochemicals).</p> <p>Legitimate interest: understanding to what extent MOL Petrochemicals Customers are satisfied with MOL Petrochemicals products and services, and complaints management procedures in order to support improvement of MOL Petrochemicals products and services, practicable customisation of the same based on customer demands, as well as improvement of complaints management practices.</p> <p>Filling online surveys or giving permission via telephone are approvals of the data subject. GDPR Art. 6. (1.a.)</p>	<p>Name and position of the Customer - or if the Customer who is a legal person, its contact -, (for proper addressing), email address, questions about the level of satisfaction of the Customer concerned, comments and answers of the data subject (for example, how services delivered to and products purchased by the Customer could be improved, how the relevant complaints are managed).</p> <p>Source of data: The Customer.</p>	<p>Until the termination of the contractual relationship or the prohibition of the data subject as the right of objection in GDPR Art. 21. (2)-(3).</p>	<p>MOL Magyar Olaj- és Gázipari Nyrt. company register number: 01-10-041683 address: Budapest, Október huszonharmadika u. 18. 1117 email: molrendezveny@mol.hu</p>	<p>The scope of data processors can change depending on who conducts the recent market research – recent data processors can be found on the MOL LUB Kft. website.</p>

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	<p>Processing shall be lawful only if and to the extent that at least one of the following applies: the data subject has given consent to the processing of his or her personal data for one or more specific purposes.</p> <p>Sending of surveys is the legitimate interest of the company, but the purchaser's or its legal representative's willing decision whether to fill it or not.</p>				
<p>Sending general marketing messages, information materials to Customers via email about news and events related to MOL Lubricants (products and services), invitations to MOL Lubricant-related events</p> <p>Above general marketing messages and information materials of MOL Petrochemicals contain only</p>	<p>GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by MOL Petrochemicals and the Customer). Legitimate interest: distribution of general marketing messages and information materials of MOL Petrochemicals in order to increase awareness of MOL</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: Customer</p> <p>Address lists are stored electronically by the company's Marketing</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. GDPR Art. 21. (2)-(3)</p>	<p>MOL Magyar Olaj- és Gázipari Nyrt. Registered seat: Budapest, Október huszonharmadika u. 18. 1117 CRN: 01-10-041683 Email: molendezveny@mol.hu marketing materials and sending out newsletters</p>	<p>Greenroom Kft. 1124 Budapest, Hegyalja út 154. CRN: 01-09-564386 Sending out marketing materials, receiving applications, transaction of prize draws</p> <p>MOL Magyarország Informatikai Szolgáltató Kft (registered seat: H-1117 Budapest, Budafoki út 79,</p>

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<p>information related to products and services offered by, news and events related to MOL Petrochemicals, and do not discuss information concerning third parties, their products or services. The company can send for the Purchaser other MOL Group member's advertisements as well:</p> <p>MOL Magyar Olaj- és Gázipari Nyrt. Registered seat: Budapest, Október huszonharmadika u. 18. 1117 CRN: 01-10-041683</p> <p>MOL Petrolkémia Zrt. Tiszaújváros, TVK Ipartelep TVK Központi Irodaház 2119/3. 136. Ép. 3581 CRN: 05-10-000065</p>	<p>Petrochemicals MOL Petrochemicals products and services, information about news and events related to MOL Petrochemicals, invitation to events related to MOL Petrochemicals that could be beneficial to the Customer (for example, information on new products, services or events of interest).</p> <p>GDPR Art. 21. (2)-(3) In case the aim of personal data management is Direct Marketing, data subject is entitled to object to the management of personal data for direct marketing purposes</p> <p>Click here for the "balance-of-interest" test.</p> <p>In case of attendance on events the company</p>	<p>Department</p>			<p>email address: ITU@mol.hu, CRN: 01-09- 195458) – Operation of SAP, CRM systems.</p> <p>MOL Magyarország Pénzügyi Szolgáltató Központ Kft. (registered office: 1039 Budapest, Szent István utca 14.,) MOL Internal postal mailing system operation (managing of incoming and outgoing consignments)</p> <p>Labelling of DM messages are operated by our contracting partners: The list of contractual partners is submitted if the data subject requests it</p>

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	applies distinct privacy policy				
<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). 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, fair and retribution-free working environment built on mutual trust.</p> <p>Click here for the “balance-of-interest” test.</p>	<p>All personal data listed under the purpose of processing above.</p>	<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>MOL Magyar Olaj- és Gázipari Nyrt. CRN: 01-10-041683 Registered seat: Budapest, Október huszonharmadika u. 18, 1117</p> <ul style="list-style-type: none"> - Should the Company initiate an ethics investigation, members of the Ethics Council can access data required to conduct the investigation. - Should the Company initiate procedures to prevent, detect and investigate fraud and misconduct, employees of Regional Security, Group Corporate 	<p>MOL Magyarország Informatikai Szolgáltató Kft (registered seat: H-1117 Budapest, Budafoki út 79, email address: ITU@mol.hu, CRN: 01-09- 195458) – Operation of SAP, CRM, Főnix systems.</p>

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				Security and Internal Audit shall have access to data required to conduct the investigation until the final decision. After the final decision data must be erased.	
<p>For the purpose of enforcement of data retention-related legal claims associated with communication and contractual relationship established by Back Office and Customer Service with the Customers, as well as effective defence in legal disputes or official proceedings</p> <p>Pursuant to GDPR Art. 17 (3e.), 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). Legitimate interest: enforcement of claims by the Controllers, effective defence against legal claims potentially initiated by the Customers and in official proceedings</p> <p>Click here for the “balance-of-interest” test.</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: depends on the current circumstances of the</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</p>	None.	<p>MOL Magyarország Informatikai Szolgáltató Kft (registered seat: H-1117 Budapest, Budafoki út 79, email address: ITU@mol.hu, CRN: 01-09- 195458) – Operation of SAP, CRM systems,</p>

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		case	<p>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>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</p>		

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			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.		

Privacy policy and “balance-of-interest” tests are available here:

<https://mol.hu/hu/adatvedelem/mol-lub-kft-adatvedelmi-tajekoztatok/>

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

MOL LUB Kft. (registered seat: 2931, Almásfüzitő, Fő utca 21. telephone: +3680201296, email: kenoanyag@mol.hu, website: <http://mol.hu/hu/kenoanyag-es-autoapolas/>)

MOL Nyrt (registered seat: 1117 Budapest, Október huszonharmadika u. 18, telephone: +36-1-886-5000, , email: ugyfelszolgalat@mol.hu, website: <https://mol.hu/>)

Beyond aforementioned according to GDPR Art. 6. (1.f.) (based on legitimate interest of the company) the Company hires lawyer partners’ services for the management of extant claims against contracting partners – and hereby forwarding them necessary personal data (especially contracting partners, contacts, representative’s data according to the contracts, data about claims) as well. Above-mentioned lawyer partners are substantive data controllers accordingly their own data privacy policy. For the application of the data subject, the Company provides information about the acting lawyer partner, its contacting details, discharged legal practise and the specific range of hereby managed data.

The above Controllers are considered to be substantive controllers accordingly their separate Privacy Notices.

Contact person(s) of the Controllers:

MOL-LUB Kft. – email address: adatvedelem-mollub@mol.hu

MOL Nyrt - email address: ugyfelszolgalat@mol.hu

Persons at the Controllers who are authorised to access data:

MOL-LUB Kft:

- **Data processing relating to contract proposals or receipt of requests for proposals by the Company:** MOL-LUB Domestic Sales
- **Credit rating:** MOL-LUB Domestic Sales, Customer Management
- **Claims management, debt collection:** MOL-LUB Domestic Sales, Customer Management
- **Conclusion of wholesale contracts signed with partners of the Company, performance of contracts:** MOL-LUB Domestic Sales, MOL-LUB Customer Management, Domestic Customer Management, Product Development and Application Center, Lubricant Warehousing, Finance and Controlling
- **Sending general marketing messages, information materials to Customers via email about news and events related to MOL Lubricants (products and services), invitations to MOL Lubricant-related events:** MOL-LUB Marketing, MOL-LUB PDAC, and MOL-LUB Sales
- **Sending access for online surveys via email, measurement of customer satisfaction and general market research for the innovation of our products and services:** MOL-LUB Marketing, Sales, Product Portfolio Management, PDAC, Customer Service, FF, SD&HSE, Business Support
- **Enforcement of legal claims of contractual relationships by the Company**

MOL Nyrt

- **Sending general marketing messages, information materials to Customers about news and events:** MOL Sales Support
- **Sending access for online surveys via email, measurement of customer satisfaction and general market research for the innovation of our products and services:** MOL Sales Support
- **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:** Ethics Council, Regional Council, Group Compliance Council, internal audit organisations

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

- **MOL Magyarország Pénzügyi Szolgáltató Kft** – credit management, billing services (registered seat: H-1117 Budapest, Budafoki út 59, email address: MFS@msc.mol.hu)
- **MOL Magyarország Informatikai Szolgáltató Kft** - operation of SAP, CRM systems, IT services (registered seat: H-1117 Budapest, Budafoki út 79, email address: ITU@mol.hu)
- **MOL Magyarország Szolgáltató Központ Kft.** – informing Company regarding negative credit proposal (registered seat: 1039 Budapest, Szent István utca 14., email: LBesnyi@MOL.hu)

Beyond the aforementioned, according to the GDPR Art. 6. (1.f.) (based on the legitimate interest of the Company) the Company hires conveyor partner's services for the management of extant claims against contracting partners and delivering consignments by the terms of contracts - and hereby forwarding them necessary personal data (especially contracting partners, contacts, representative's data according to the contracts, data about claims) as well. Above mentioned conveyor partners are data processors following the Company's instructions. For the application of the data subject the Company provides information about the acting conveyor partner, its contacting details, discharged legal practise and the specific range of hereby managed data.

Contact person(s) of the Processors:

- **MOL Magyarország Pénzügyi Szolgáltató Korlátolt Felelősségű Társaság (MFS Kft.)** – e-mail: MFS@msc.mol.hu

- **MOL Magyarország Szolgáltató Központ Kft.** – e-mail: LBesnyi@MOL.hu
- **MOL Magyarország Informatikai Szolgáltató Kft. (MIS Kft.)** – e-mail: ITU@mol.hu

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

- **MOL Magyarország Pénzügyi Szolgáltató Korlátolt Felelősségű Társaság (MFS Kft.)** – credit rating, credit line assessment, test solution estimation, claim management organiser colleagues
- **MOL Magyarország Szolgáltató Központ Kft.** –colleagues working with credit proposals
- **MOL Magyarország Informatikai Szolgáltató Kft. (MIS Kft.)** – SAP, CRM, Főnix systems and IT services providing colleagues

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 is transferred to third country.

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: no automated decision-making or profiling are involved.

Data security measures:

The Company shall plan and carry out data processing operations in a way so as to protect the privacy of data subjects in the context of application of the GDPR and other legal regulations on data processing.

The Company shall provide for security of data, take appropriate technical and organisational measures, as well as develop adequate procedural rules required for the enforcement of the GDPR and other rules on data protection and confidentiality.

Company shall protect data by means of suitable measures commensurate to the degree of risks involved against unauthorised access, alteration, transmission, public disclosure, deletion or destruction, as well as accidental damage and loss, provided that stored data cannot be corrupted and rendered inaccessible due to any changes in or modification of the applied technique. Accordingly, the Controllers shall store the personal data of the data subject in a

password protected and/or encrypted database. As part of the protection commensurate to the degree of risks involved, the Controllers shall protect data with firewalls, antivirus programs, encryption mechanisms, content filtering, as well as other technical and process solutions. Data security incidents shall be continuously monitored.

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 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 manages 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 management 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 above 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. If you submitted the request electronically, the requested information shall be made available to you in electronic format, unless you expressly provided otherwise.

If the Company does not take action on your request, the controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the competent data protection

supervisory authority (In Hungary, the Nemzeti Adatvédelmi és Információszabadság Hatóság (*National Authority for Data Protection and Freedom of Information*) briefly '**NAIH**') and seeking a judicial remedy. Contact details of NAIH (address: 1125 Budapest Szilágyi Erzsébet fasor 22/C., Tel: +36 1 391 1400, Fax: +36-1-391-1410, email: ugyfelszolgalat@naih.hu, website: <http://naih.hu/>)

Above information shall be provided 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 other administrative or judicial proceedings, you have the right to lodge a complaint to a supervisory authority - in particular in the Member State of your habitual place of stay, place of work or the place of the alleged infringement - if you consider that the processing of personal data relating to you violates provisions of the GDPR. You shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning you. You shall also have the right to an effective judicial remedy where the supervisory authority which is competent does not handle a 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 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, its controller or processor partner shall be brought before the courts of the Member State where the Company, its controller or processor partner has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

In Hungary, the action falls within the jurisdiction of the Törvényszék (General Court). For information on jurisdiction and contact details of courts, visit the following website: www.birosag.hu

If the court rules in your favour, finds that infringement was committed and obliges the Company and the processor engaged to stop unauthorised processing operations and to restore legality of processing, and requires them to engage in a certain conduct to ensure that your rights can be exercised and, if applicable, also decides on compensation and restitution claims. The court may order disclosure of the judgement by disclosure of identification data of the Company and the processor if the judgement affects a wide range of persons or the gravity of the breach justifies disclosure.