

Privacy Notice
concerning the data management of MOL-LUB Ltd.'s
LubCheck online registration

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>The necessary communication for LubCheck oil diagnostic services and compliance</p> <p><u>Filing system:</u> Fónix</p>	<p>GDPR Art. 6. (1.f) Legitimate interests pursued by the company and the ordering partner</p> <p>Legitimate interest: Necessary communication for the performance of the ordered services</p>	<p>Contact person's name, email address, phone number</p>	<p>Continuously while the requisition of the services, but only till 5 years last from the last contact.</p>	<p>No data transfer comes off.</p>	<p>Infsoft Rendszerház Kft. registered seat: 1117 Bp. Hauszmann Alajos u. 4/B fszt.3. CRN: 01-09-680700 website developer</p> <p>MOL IT & Digital GBS Magyarország Korlátolt Felelősségű Társaság (registered seat: 1117 Budapest, Budafoki út 59., email address: ITU@mol.hu) – Provision of server services concerning the data management</p>

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

a MOL-LUB Kenőanyag Gyártó Forgalmazó és Szolgáltató Korlátolt Felelősségű Társaság

registered name: MOL-LUB Kft.

registered seat: 2931 Almásfüzitő, Fő út 21.

company registration number: 11-09-008758;

phone number: +36 80 201 296

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

email address: mollub-adatvedelem@mol.hu

The above Controller is considered to be substantive controller accordingly its separate Privacy Notices. The Controller determines the purpose and circumstances of data management substantively.

Contact person of the Controller: adatvedelem-mollub@mol.hu

Persons at the Controllers who are authorized to access data:

MOL-LUB Ltd. Product Development and Application Centre concerned co-workers

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

Infosoft Rendszerház Kft.

registered seat: 1117 Bp. Hauszmann Alajos u. 4/B fszt.3.

company registration number: 01-09-680700

Website developer

MOL IT & Digital GBS Hungary Ltd. (registered seat: 1117 Budapest, Budafoki út 59., email address: ITU@mol.hu) – Provision of server services concerning the data management

Transfer of personal data to a third country: no personal data are 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 Controllers shall plan and carry out data processing operations in a way to protect the privacy of data subjects in the context of application of the GDPR and other legal regulations on data processing.

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

Controllers shall protect data by means of suitable measures commensurate to the degree of risks involved against unauthorized 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 and handled.

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 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 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.