

Privacy Notice on the processing operations of MOL Nyrt ("Company") related to the MeFTIR (e-PTW) system

Description and purpose of the processing	Legal basis for the processing	Scope of the personal data processed and their	Duration of the processing	Recipient of the data transfer	Processor and its processing operations
Comprehensive HSE (Health, Safety and Environment) training	Article 6(1)(f) of the GDPR (legitimate interest of the Company and its contractor/subcontractor). Legitimate interest: to provide the contractor/subcontractor's employees with the necessary know-how to perform the contract between the Company and its contractor and to enable their employees to carry out their activities in a professional, safe and lawful manner. The balance-of-interests test is available at https://mol.hu/hu/molrol/beszallitoi-kozpont/meftir/.	Name of the employee of the contractor/subcontractor attending the training, date of birth of the participant, the date of the examination and the validity of the (basic) training. Source of data: recorded from the data subject. FER Tűzoltóság és Szolgáltató Kft will keep the training attendance sheet for the duration of data processing indicated here.	With regard to any civil law claims of the Company or the possibility of civil law claims, legal or other official proceedings against the Company, in accordance with Article 6:22 of Act V of 2013 on the Civil Code (HCC), 5 years from the date of the last work permit issued to the employee.	MOL Nyrt and MOL Petrolkémia Zrt are considered as joint data controllers.	MOL Magyarország Informatikai Szolgáltató Kft (H-1117 Budapest, Budafoki út 79) - operation, management of access rights, participation in development, interface management, closure of pending permits. Petrolszolg Kft (H-2440 Százhalombatta, Olajmunkás út 2.) - loading data into the MeFTIR system. piLINE Kft (H-1034 Budapest Bécsi út 126-128 (Kiscelli Office Building)) - development and IT support for the MeFTIR system. FER Tűzoltóság és Szolgáltató Kft (H-2443 Százhalombatta, Olajmunkás út 2) - loading data into the MeFTIR system, conducting training courses, examinations.

Work supervisor training	Article 6(1)(f) GDPR (legitimate interest of the Company and its contractor/subcontractor). Legitimate interest: to provide the contractor/subcontractor's employees with the necessary work supervisor know-how to perform the contract between the Company and its contractor and to enable these employees to carry out their supervisory activities in a professional, safe and legally compliant manner. The balance-of-interests test is available at MeFTIR - Supplier Center - About MOL Group - MOLGroup	Name of the employee of the contractor/subcontractor attending the training, date of birth of the participant, the date of the examination and the validity of the work supervisor training. Source of data: recorded from the data subject. FER Tűzoltóság és Szolgáltató Kft will keep the training attendance sheet for the duration of data processing indicated here.	With regard to any civil law claims of the Company or the possibility of civil law claims or legal proceedings against the Company, in accordance with Article 6:22 of Act V of 2013 on the Civil Code (HCC), 5 years from the date of the last work permit issued to the employee.	MOL Nyrt and MOL Petrolkémia Zrt are considered as joint data controllers.	MOL Magyarország Informatikai Szolgáltató Kft (H-1117 Budapest, Budafoki út 79) - operation, management of access rights, participation in development, interface management, closure of pending permits. Petrolszolg Kft (H-2440 Százhalombatta, Olajmunkás út 2.) - loading data into the MeFTIR system. piLINE Kft (H-1034 Budapest Bécsi út 126-128 (Kiscelli Office Building)) - development and IT support for the MeFTIR system. FER Tűzoltóság és Szolgáltató Kft (H-2443 Százhalombatta, Olajmunkás út 2) - loading data into the MeFTIR system, conducting training courses, examinations.
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Provision of employee data related to work permits required to carry out work in MOL's process areas (e.g. refining, petrochemicals, logistics, R&D, other areas where hazardous substances and energy may be present)	Article 6(1)(f) GDPR (legitimate interest of the Company and its contractor/subcontractor). Legitimate interest: to carry out the work permit procedure necessary for the performance of the contract between the Company and its contractor, and to secure work carried out in MOL process areas. The balance-of-interests test is available at MeFTIR - Supplier Center - About MOL Group - MOLGroup	The name of the contractor/subcontractor employee concerned, the SAP ID of the company he/she represents, the participant's date of birth, telephone number, upon termination of employment (date), validity of occupational health fitness-for-duty examination, fire safety certificate number (Occupational Branch 1 - Welders), date of issue of the fire safety certificate (Occupational Branch 1 - Welders), number of fire safety certificate (Occupational Branch 2 - Welders) - Handling of "A"- "B" materials), date of issue of the fire safety certificate (Occupational Branch 2 - Handling of "A"- "B" materials), welder certificate ID, lifting equipment operator certificate ID, carpenter, scaffolder certificate ID, SCC certificate ID, date of issue of the SCC certificate, mining safety certificate ID and date of issue Source of data: recorded from the relevant contractor/subcontractor.	With regard to any civil law claims of the Company or the possibility of civil law claims or legal proceedings against the Company, in accordance with Article 6:22 of Act V of 2013 on the Civil Code (HCC), 5 years from the date of the last work permit issued to the employee.	MOL Nyrt and MOL Petrolkémia Zrt are considered as joint data controllers.	MOL Magyarország Informatikai Szolgáltató Kft (H-1117 Budapest, Budafoki út 79) - operation, management of access rights, participation in development, interface management, closure of pending permits. Petrolszolg Kft (H-2440 Százhalombatta, Olajmunkás út 2.) - loading data into the MeFTIR system. piLINE Kft (H-1034 Budapest Bécsi út 126-128 (Kiscelli Office Building)) - development and IT support for the MeFTIR system. FER Tűzoltóság és Szolgáltató Kft (H-2443 Százhalombatta, Olajmunkás út 2) - loading data into the MeFTIR system, conducting training courses, examinations. MOL Petrolkémia Zrt (H-3581 Tiszaújváros, TVK Ipartelep) - issuing work permits. MOL Nyrt (H-1117 Budapest, Október huszonharmadika utca 18) - issuing work permits.
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The data controller and data processors: The Privacy Notice and the balance-of-interests test are available at <https://mol.hu/hu/molrol/beszallitoi-kozpont/meftir/>.

Name, address, telephone number, website (where the Privacy Notice is available) and e-mail address of the controller: MOL Nyrt (registered office: H-1117 Budapest, Október huszonharmadika u. 18, phone: +36-70-373-0921, website: www.mol.hu, e-mail: meftir@mol.hu) MOL Petrolkémia Zrt (H-3581 Tiszaújváros, TVK Ipartelep, e-mail address: meftir@mol.hu) - issuing work permits.

Contact person(s) of the controller: MOL Nyrt - e-mail address: meftir@mol.hu MOL Petrolkémia Zrt - e-mail cím: meftir@mol.hu

Name and contact details of the Data Protection Officer(s) of the controller: dpo@mol.hu Persons who are authorised to access data of the data controller: - Comprehensive HSE (Health, Safety and Environment) training: registered employees of MOL Nyrt and MOL Petrochemicals Zrt with a valid work permit issuer certificate can access data related to HSE training.

- Work supervisor training: employees authorised to approve user access rights for a specific area: employees of MOL Nyrt and MOL Petrochemical Zrt with a valid work permit issuer certificate can access data related to HSE training.

- Provision of employee data related to work permits required to carry out work in MOL's process areas: employees of MOL Nyrt and MOL Petrolkémia Zrt with a valid work permit issuer certificate can access data required to issue work permits.

Name, registered office, phone number, website (where privacy notices are available) and email address of the processors: - MOL Hungary Informatikai Szolgáltató Kft (registered office: H-1117 Budapest, Budafoki út 79, phone +36-70-373-2005, e-mail: itu@mol.hu) - operation, management of access rights, participation in development, interface management, closure of pending licenses; - Petrolszolg Kft (H-2440 Százhalombatta, Olajmunkás út 2., phone +36-20-420-5335, e-mail: meftir@mol.hu) - loading data into the MeFTIR system; - piLINE Kft (1034 Budapest Bécsi út 126-128 (Kiscelli Office Building), phone +36 1 4367676, website www.piline.hu, www.laserscan.hu, e-mail akta@piline.hu) - development and IT support for the MeFTIR system; - FER Tűzoltóság és Szolgáltató Kft (H-2443 Százhalombatta, Olajmunkás út 2, phone: + 36 23 551 115, website: www.fer.hu, e-mail: fer@fer.hu) - loading data into the MeFTIR system, conducting training courses, examinations; Contact person(s) of the data processors: - MOL Magyarország Informatikai Szolgáltató Kft - IS Helpdesk phone number: +36-70-373-2005, e-mail address: itu@mol.hu - Petrolszolg Kft phone number: +36-20-420-5335, e-mail address: meftir@mol.hu - piLINE Kft - phone: +36 1 4367676, website: www.piline.hu, www.laserscan.hu, e-mail: akta@piline.hu - FER Tűzoltóság és Szolgáltató Kft phone: + 36 23 551 115, website: www.fer.hu, e-mail: fer@fer.hu Name and contact details of the Data Protection Officer(s) of the data processor(s): -

Persons who are authorised to access to the data at the data processors: - MOL Magyarország Informatikai Szolgáltató Kft (H-1117 Budapest, Budafoki út 79) - operation, management of access rights, participation in development, interface management, closure of pending permits.

- Petrolszolg Kft (H-2440 Százhalombatta, Olajmunkás út 2.) - loading data into the MeFTIR system.

- piLINE Kft (H-1034 Budapest Bécsi út 126-128 (Kiscelli Office Building)) - development and IT support for the MeFTIR system.

- FER Tűzoltóság és Szolgáltató Kft (H-2443 Százhalombatta, Olajmunkás út 2) - loading data into the MeFTIR system, conducting training courses, examinations.

Processing of sensitive personal data for the purposes set out in this Notice: No sensitive personal data will be processed.

Transfer of data to a third country: no data will be transferred to third countries.

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 will be involved.

Data security measures:

To guarantee the confidentiality, integrity and availability of the personal data of the data subjects, the Company stores personal data in a password-protected IT security standards and norms.

The Company secures the data in a risk proportionate manner and in accordance with the classification of the type of personal and business data by means of network, infrastructure and application level protection (firewalls, anti-virus programs, storage and communication encryption mechanisms, content filtering and other technical and process solutions). Data security incidents are monitored and managed on an ongoing basis. Encryption is asymmetric, meaning that the encrypted data stream cannot be decrypted without the decryption key.

In defining and operating the management of access rights of the MeFTIR system, the Company has taken particular care to ensure that only personal data which are necessary for each specific purpose of the processing are processed.

With regard to this, the Company defined the following two management of access rights arrangements for the ePTW system: - function-level management of access rights: only predefined user groups can be assigned to users. Any number of user-selected functions can be assigned to individual groups, but for the sake of simplicity, typically a group is a menu item.

- data-level management of access rights: data that can be linked to a specific site are automatically filtered by the sites selected for that user. The employee maintenance list is typically different, where only access rights can be managed at function level only.

The personal data processed in the MeFTIR system for data subjects who have not been issued a work permit to carry out work in MOL sites for at least 5 years and do not have a valid basic or a work supervisor certificate registered in the system will be automatically anonymised after the above mentioned period and conditions have been met. Such anonymised data can no longer be linked to the data subjects.

Your rights regarding data processing: Your data protection rights and remedies and their limitations are set out in detail in the GDPR (in particular GDPR Articles 15, 16, 17, 18, 19, 20, 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. Below is a summary of the main provisions. The Company draws your attention in particular to the following when providing the information: You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data on the basis of the Company's legitimate interest. In such a case, the Company may no longer process the personal data unless the Company can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Right to information: Where the Company processes personal data relating to you, the Company is obliged to provide you with information, even without request, on the most important features of the processing, such as the purpose, legal basis, duration, identity and contact details of the Company and its representative, the recipients of the personal data (with appropriate and suitable safeguards in the case of transfers to third countries), the legitimate interests of the Company and/or third parties in the case of processing based on legitimate interests, and your rights and remedies (including the right to lodge a complaint with a supervisory authority) in relation to the processing, if you do not already have this information.

The Company will provide this information by making this notice available to you.

Right of access: You have the right to receive feedback from the Company as to whether your personal data is being processed and, if such processing is taking place, you have the right to access your personal data and certain information about the processing, including the purposes of the processing, the categories of personal data concerned, the recipients of the personal data, the (envisaged) duration of the processing, the rights and remedies of the data subject (including the right to lodge a complaint with a supervisory authority) and, in the case of data not collected from you, information about the source of the data.

On request, the Company will provide you with a copy of the personal data processed. For any additional copies you request, the Company may charge a reasonable fee based on administrative costs. If you have submitted your request electronically, the information will be provided in a commonly used electronic format unless you request otherwise.

The right to obtain a copy shall not adversely affect the rights and freedoms of others. The Company will provide you with information on the possibility of obtaining a copy, how to obtain a copy, the possible costs and other details at your request.

Right to rectification: You have the right to have inaccurate personal data concerning you corrected by the Company without undue delay upon your request. Taking into account the purpose of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

Right to erasure: You have the right to have your personal data deleted by the Company without undue delay upon your request, and the Company is obliged to delete your personal data without undue delay if certain conditions are met. Among other things, the Company is obliged to delete your personal data at your request if the personal data are no longer necessary for the purposes for which it was collected or otherwise processed; if you withdraw your consent on the basis of which the data was processed and there is no other legal basis for the processing; or if the personal data has been processed unlawfully; or you object to the processing and there are no overriding legitimate grounds for the processing; the personal data must be erased in order to comply with a legal obligation under Union or Member State law applicable to the Company.

The above shall not apply if the processing is necessary: a) for the exercise of the right to freedom of expression and information; (b) for compliance with an obligation under Union or Member State law which requires the processing of personal data applicable to the Company; (c) for archiving purposes in the public interest, for scientific and historical research purposes or for statistical purposes, where the right of erasure would be likely to render impossible or seriously impair such 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 a restriction on processing where any of the following applies: a) You dispute the accuracy of the personal data, in which case the restriction will apply for the period necessary for 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 you need it for the establishment, exercise or defence of legal claims; or d) You have objected to the processing, in which case the restriction shall apply for the period necessary to determine whether the Company's legitimate grounds override your legitimate grounds. Where processing has been restricted based on the above, such personal data shall, except for 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 reasons of important public interest of the Union or a Member State.

The Company will inform you in advance if the restriction on processing you have requested is lifted.

Right to object: You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data on the basis of the Company's legitimate interest. In such a case, the Company may no longer process the personal data unless the Company can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

How to exercise your rights: The Company shall inform you of the action taken on your request concerning your rights listed above without undue delay and in any event within one month of receipt of the request. This period may be extended by a further two months if necessary, taking into account the complexity and the number of requests. The Company will inform you of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. If You have submitted your request by electronic means, the information shall be provided by electronic means where possible, unless you request otherwise. If the Company fails to take action on your request, it shall inform you without delay, but no later than one month after receipt of the request, of the reasons for not taking action, and the possibility of lodging a complaint with the competent data protection supervisory authority (in Hungary, the National Authority for Data Protection and Freedom of Information; "NAIH") and seeking a judicial remedy. NAIH contact details: H-1125 Budapest Szilágyi Erzsébet fasor 22/C, phone: +36 1 391 1400, fax: +36-1-391-1410, email: ugyfelszolgalat@naih.hu, website: <http://naih.hu/>).

The above information must be provided in writing or by other means, including electronic means where appropriate. At your request, the information may be provided orally, provided that your identity is proved 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 is in breach of the 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 competent supervisory authority does not deal with the complaint or does not inform you within three months of the progress or outcome of the complaint lodged. Proceedings against the supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

Without prejudice to other 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 this Regulation have been infringed as a result of the processing of your personal data in breach of this Regulation. Proceedings against the Company or its data controller or data processor contractor shall be brought before the courts of the Member State in which the Company or the controller or processor has an establishment. Such proceedings can also be brought in the courts of the Member State where you have your habitual residence. In Hungary, such an action is subject to the jurisdiction of Törvényszék (General Court). Information on the jurisdiction and contact details of the courts can be found at: www.birosag.hu. The general court may order the Company to provide the information, to rectify, limit or delete the data, to cancel the decision taken by automated data processing, to take into account your right to object.

The court may order the disclosure of its decision in a such a way as to identify the Company or its other contractors, and the infringement committed.

You may seek compensation from the data controller responsible for the damage caused by unlawful processing (including failure to take security measures). The data processor will only be liable for the damage caused by processing if it has failed to comply with the obligations of the GDPR specifically directed to at processors or if it has acted outside or contrary to the lawful instructions of the Company. If any of the above persons violate your privacy rights by processing your data unlawfully or by breaching data security requirements, you may claim damages.

The Company, its controller or its processing partner shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.