

## Privacy Notice on the processing of contact data identified in a contract

Denomination and purpose of the data processing	Legal basis of the data processing	Scope and source of the processed personal data	Duration of the data processing	Recipient of the data transfer	Data processor and its processing activity
<p><b>Processing of data of contact persons of contracting partners or potential contracting partners and/or persons involved in the request for offer / tender process, contract performance / contract performance verification.</b></p> <p><b>The purpose: to request an offer, to submit an offer, and to perform the contract (day-to-day execution).</b> This includes, for example, managing the postal addresses of the persons concerned, instructing the persons concerned to make payments, or sending notifications, using contact details and information relating to</p>	<p>Depending on whether the Company is dealing with the data subject (e.g. self-employed persons) or with other undertakings or whether it is entering into a contract: Article 6(1)(b) GDPR - directly for the performance (performance) of the contract with the data subject or necessary for taking steps at the request of the data subject prior to entering into the contract / Article 6(1)(f) GDPR - legitimate interest of the Company and the party to the contract: performance of contractual obligations, exercise of rights and economic cooperation between the parties.</p>	<p>The names of the contact persons of potential partners and contractual partners and of the persons involved in the bidding process, performance and monitoring of performance, their contact details (e-mail, telephone number, mobile phone number, fax number, description of the relationship with the partner concerned), the actions to be taken to develop the relationship with the partner and any activities and communications involving personal data in relation to the offer or contract (e.g. communications from the contact person or any natural person acting on behalf of the partner).</p>	<p>5 years from the date of termination of the contractual relationship or (if different) from the date of the last contact (inactivity) with the contact person (Civil Code. 6:22 (1) - if the Civil Code does not provide otherwise, claims expire within 5 years.) For example, a contact purchaser may be placed in "inactive" status if he or she is transferred to another department at the partner and the Company enters into a new contact with a new purchaser, or if the contact person's employment with the partner is terminated and he or she is replaced by a new contact person. In this case, it is in the legitimate interest of both the Company and</p>	<p>-</p>	<p>MOL uses the cloud based <a href="#">Microsoft 365 services</a> (e.g. Word, Excel, PowerPoint, Teams, Outlook) to store the personal data.</p> <p><b>MOL IT &amp; Digital GBS Ltd.</b> (1117 Budapest, Dombóvári út 28.) - provision of ancillary services closely related to data management, IT services, provision of MOL systems.</p>

<p>the offer or the contractual obligations to be performed.</p>	<p>The provision of personal data is a contractual requirement; without the personal data, the Company cannot make an offer, request an offer or enter into and perform a contract.</p>	<p>The personal data is either provided to the Company by the partner or by the data subjects themselves; and the Company may also collect it from publicly available lawful sources (e.g. the partner's website, company register).</p>	<p>the relevant partner to know who the predecessor of the contact person was within the limitation period under the Civil Code and to whom it is possible to refer to, and possibly to continue to seek advice on a particular issue where background knowledge of previous transactions is required.</p> <p><b>With regard to the fulfilment of tax obligations:</b> the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared, reported or notified, or in the absence of declaration, reporting or notification, the tax should have been paid (Articles 78 (3) and 202 (1) of Act CL of 2017 on the Rules of Taxation - "Art.").</p> <p><b>For accounting documents:</b> the data</p>		
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			retention period is 8 years (§ 168-169 of the Accounting Act). In practice, this is the case if the data are part of the documents supporting the accounting, for example, documents related to the conclusion of a contract between the Company and the partner (e.g. an order) or the invoice issued.		
<b>Processing of data of contact persons of contractual partners and persons involved in the performance and monitoring of performance for the purpose of any other action related to compliance with the contract or the performance of the contract, including seeking remedies necessary to ensure contractual rights.</b>	The legal basis for the processing in this case is the Company's legitimate interest (Article 6(1)(f) GDPR). Legitimate interest: to deal with compliance issues relating to the contract and to carry out any other activities related to the performance of the contract, including seeking remedies necessary to ensure contractual rights.	The names of the contact persons of the contractual partners and of the persons involved in the performance and monitoring of the performance, their contact details (e-mail, telephone number, mobile phone number, fax number) and any activity and communication containing personal data in relation to the contract (e.g. communication from the contact person or any natural person	5 years from the termination of the contractual relationship (Civil Code. § 6:22 (1) - unless otherwise provided for in the Civil Code, claims expire within 5 years.)  With regard to the fulfilment of tax obligations: 5 years from the last day of the calendar year in which the tax should have been declared, reported or notified, or in the absence of declaration, reporting	-	MOL uses the cloud based Microsoft 365 services (e.g. Word, Excel, PowerPoint, Teams, Outlook) to store the personal data.  MOL IT & Digital GBS Ltd. (1117 Budapest, Dombóvári út 28.) - provision of ancillary services closely related to data management, IT services, provision of MOL systems.

		<p>acting on behalf of the partner).</p> <p>The personal data are provided to the Company either by the contracting partner or by the data subjects themselves.</p>	<p>or notification, the tax should have been paid (Art.</p> <p>In the case of accounting documents: 8 years (§§ 168-169 of the Accounting Act). In practice, this is the case if the data are part of the documents supporting the accounting, for example, documents relating to the conclusion of a contract between the partnership and the partner (e.g. an order) or an invoice issued.</p>		
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**Name, postal address, telephone number, website (where the privacy notices are available) and e-mail address of the data controller(s):**

MOL Plc.

1117 Budapest, Dombóvári út 28.,

Hungary

+36 1 886 5000

Company registration number: Cg.01-10-041683

[www.mol.hu](http://www.mol.hu)

[ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu)

The Company is an independent data controller, whereby it determines the purpose and scope of data processing individually and is responsible only for its own data processing activities.

In addition to the above, the Company uses the services of its legal partners for the management and successful enforcement of its claims pursuant to Article 6(1)(f) of the GDPR (based on the Company's legitimate interest) and transfers the necessary personal data to these lawyers for this purpose. These lawyers act as independent data controllers, in accordance with the provisions of their respective privacy notices. Where law partners are instructed for a specific case and upon request of the individual, the Company will provide information about the law partner involved in the specific processing operation, as well as the contact details of the lawyer, his/her activities and the data processed in this context.

**Contact person(s) of the data controller(s):**

MOL Retail Customer Service

1117 Budapest, Október huszonharmadika utca 18.

Hungary

+36 1 886 5000

[ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu)

**Name and contact data of the data controller's Data Protection Officer(s):** [dpo@mol.hu](mailto:dpo@mol.hu)

**Persons at the data controller who are authorized to access to the data (by data processing purposes):**

- MOL Plc - Employees at MOL Plc acting under the relevant Contract
- In the event of an ethics investigation by MOL Plc, the members of the Ethics Board shall have access to the data necessary for the investigation.
- Where necessary for the enforcement of legal claims, employees of MOL Plc may have access to the data necessary for the enforcement of legal claims.
- If MOL Plc initiates other procedures to prevent, detect and investigate fraud and abuse, employees of the Group Security and Group Internal Audit and Compliance organisations will have access to the data necessary for the investigation.
- In cases where the Company launches an ethics investigation, the members of the Ethics Board have access to the data necessary for the conduct of the investigation.

- If other procedures are initiated to prevent, detect and investigate fraud and abuse at Group level in the MOL Group, employees of the Regional Security, Group Security and Group Internal Audit and Compliance organisations will have access to the data necessary for the investigation.

**Name, postal address, telephone number, website (where the privacy notices are available) and e-mail address of the data processor(s) and other data controller recipient(s):**

The service providers that are operating the Microsoft 365 services are:

**Microsoft Ireland Operations Ltd.**

One Microsoft Place

South County Business Park

Leopardstown

Dublin 18, D18 P521, Ireland

**Microsoft Corporation**

One Microsoft Way

Redmond, Washington 98052 USA

Online contact: [Ask questions about Microsoft privacy – Microsoft privacy](#)

During the use of the Microsoft 365 services, personal data may also be processed in non-EU countries that do not provide the appropriate level of data protection set by the GDPR. With respect to the collection, transfer and processing of personal data in non-EU member states, Microsoft Corporation provides for the personal data protection through standard contractual clauses approved by the EU Commission in decision 2021/914/EC, dated 4 June 2021.

Further information:

<https://www.microsoft.com/en-us/trust-center/privacy/gdpr-overview>

[Microsoft's commitment to GDPR, privacy and putting customers in control of their own data - Microsoft On the Issues](#)

[GDPR simplified A guide for your small business - Microsoft 365 admin | Microsoft Docs](#)

MOL IT & Digital GBS Kft. (1117 Budapest, Dombóvári út 28.) - providing ancillary services closely related to data management, IT services, providing MOL systems.

**MOL IT & Digital GBS Kft.** (1117 Budapest, Dombóvári út 28.) - provision of ancillary services closely related to data management, IT services, provision of MOL systems.

**Contact person(s) of the data processor(s) and other data controller recipient(s):**

Microsoft Ireland Operations Ltd. and Microsoft Corporation see above

MOL IT & Digital GBS Ltd. - itu@mol.hu

**Name and contact data of the data processor's Data Protection Officer(s):**

Microsoft Ireland Operations Ltd. and Microsoft Corporation see above

MOL IT & Digital GBS Ltd - dpo@mol.hu

**Persons at the data processor who are authorized to access to the data:**

Microsoft Ireland Operations Ltd. and Microsoft Corporation see above

MOL IT & Digital GBS Ltd - Experts in the operation of IT infrastructure.

**Processing of sensitive personal data for the purpose specified in this privacy notice:**

No sensitive personal data is processed in the context of the above.

**Transfer of personal data to a third country:** No transfer of data to third countries.

**The existence of automated decision-making, including profiling, 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:** not applicable.

**Data security measures**

<b>Information Security Management System</b>	To ensure the confidentiality, integrity and availability of organizational information by implementing policies, processes, process descriptions, organizational structures, software and hardware functions.
<b>Physical access</b>	To ensure physical asset protection containing MOL Group information.
<b>Logical access</b>	To ensure that only approved and authorized users have access to data used by MOL Group Companies.
<b>Data access</b>	To ensure that only authorized users of the systems have access to MOL Group Company data.
<b>Data transfer/ storage/ erasure</b>	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.
<b>Confidentiality and integrity</b>	To ensure that MOL Group's corporate data is kept confidential and upto date, also preserves integrity.
<b>Availability</b>	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.
<b>Separation of data</b>	To ensure that MOL Group Company data is handled separately from other client data.
<b>Incident management</b>	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.
<b>Audit</b>	To ensure that the processor periodically tests, examines and evaluates the effectiveness of the technical and organizational measures outlined above.

### **Your data protection rights:**

The GDPR contains in detail your data protection rights, your possibilities of seeking a legal remedy and the restrictions thereof (especially sections 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). 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 and to the sending of direct marketing messages, and you have the right to data portability. We summarize the most important provisions below.

### **Right to information:**

If the data controller processes your personal data it must provide you information concerning the data relating to you – even without your special request thereof – including the main characteristics of the data processing just as the purpose, grounds and duration of control, the name and address of the data controller and its representative, the recipients of the personal data (in case of data transfer to third countries indicating also the adequate and appropriate guarantees), the legitimate interests of the data controller 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), in the case if you have not had yet all this information. In case of automated decision-making or profiling the data subject must be informed in an understandable way about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Data controller provides you the abovementioned information by making this privacy notice available to you.

**Right of access:**

You have the right to obtain from the controller 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 the data subject. Upon your request the controller shall provide a copy of your personal data undergoing processing. For any further copies requested by you, the controller may charge a reasonable fee based on administrative costs. The right to obtain a copy shall not adversely affect the rights and freedoms of others. The data controller gives you information on the possibility, the procedure, the potential costs and other details of providing the copy after receiving your request.

In case of automated decision-making and profiling the data subject has access to the following information: the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

**Right to rectification:**

You have the right to obtain from the controller 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 controller the erasure of personal data concerning you without undue delay and the controller has the obligation to erase personal data without undue delay where certain grounds or conditions are given. Among other grounds the data controller 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 controller is subject; or if the personal data have been collected in relation to the offer of information society services.

**Right to restriction of processing:**

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

- (a) the accuracy of the personal data is contested by you, for a period enabling the controller 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 controller 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 controller override your legitimate grounds .

Where processing has been restricted according to the abovementioned 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 for 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 controller before the restriction of processing is lifted.

**Right to data portability:** this right does not apply to the processing of contact details.

**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 data controller. The controller shall no longer process the personal data unless the controller demonstrates 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 controller 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 controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. If the controller 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 cthe Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information) briefly ‘NAIH’) and seeking a

judicial remedy. Address, telephone number, fax number, e-mail address and website of the NAIH: 1055 Budapest, Falk Miksa utca 9-11., post address: 1373 Budapest, postal mailbox 9., Tel: +36 1 391 1400, +36 (30) 683-5969 vagy +36 (30) 549-6838 Fax: +36-1-391-1410, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: <http://naih.hu/>.

In the event of any infringement of your rights you may file for court action. The action falls within the jurisdiction of the Törvényszék (General Court). Upon the data subject's request the action can be brought before the Court which is competent based on the domicile or the place of residence of the data subject. The court may order the data controller to provide the information, to rectify, block or erase the data in question, to annul the decision adopted by means of automated data-processing systems, to honor the data subject's objection. The court may order publication of its decision, indicating the identification of the data controller or any other data controllers and the committed infringement.

The data controller concerned shall be liable for any damage caused to a data subject as a result of unlawful processing or by any breach of data security requirements. Where any data controller violates the rights of the data subject relating to personality as a result of unlawful processing or by any breach of data security requirements, the data subject shall be entitled to demand restitution from the data controller concerned. Data controller may be exempted from liability for damages or for payment of restitution if he proves that the damage was caused by or the violation of the rights of the data subject relating to personality is attributable to inevitable reasons beyond his control.

No compensation shall be paid and no restitution may be demanded where the damage was caused by or the violation of rights relating to personality is attributable to intentional or negligent conduct on the part of the data subject.