

This is an unofficial, working translation of the „Adatvédelmi Tájékoztató a MOL Nyrt. elektromobilitási szolgáltatásával vonatkozó ügyfélszolgálattal kapcsolatos adatvédelmi tevékenységéről” (Privacy Notice on the data processing operations of the ELECTROMOBILITY SERVICE-RELATED customer service (“Customer Service”) of MOL Nyrt.) for information purposes only. In case of any discrepancies between the two versions, the Hungarian version shall prevail.

**Privacy Notice**  
**on the data processing operations of the**  
***ELECTROMOBILITY SERVICE-RELATED***  
**customer service (“Customer Service”) of MOL Nyrt. (“Company”)**

<b>Designation and purpose of data processing</b>	<b>Legal basis for data processing</b>	<b>Scope of data processed and their source</b>	<b>Duration of data processing</b>	<b>Recipient of data transfer</b>	<b>Data processor and data processing activity</b>
<b>Recording of telephone conversations with the Company’s Customer Service</b>	<p>Article 6 (1) a) of the GDPR – voluntary consent by the data subject, which is granted at the beginning of the telephone conversation by continuing the call. The full text of the notice is available on the website at the <a href="http://www.molplugee.hu/legal">www.molplugee.hu/legal</a> link, or in printed form at all charging stations.</p> <p>The data subject is entitled to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of any processing that was conducted based on the consent prior to its withdrawal.</p>	<p>The voice recordings of calls received and initiated through the Customer Service call centre. The recordings contain the voices of Customers, data subjects not qualifying as customers (“<b>Customer</b>”) and Customer Service employees.</p> <p>In the case of complaints or reports submitted, the data recorded also include the data subject's name, address, telephone number and email address, the data contained in the complaint or report, the</p>	<p>Unless the consent is withdrawn, the Company retains the voice recording and the related personal data for <b>5 years</b> (pursuant to Section 6:22 (1) of Act V of 2013 on the Civil Code (“<b>Civil Code</b>”)), with a view to exercise any potential civil law claims of the Company or to defend against any potential civil law claims of data subjects.</p> <p>Further details are available at the data purpose entitled “<i>Data retention pertaining to communication by the Customer Service with</i></p>	None.	<p>MIS Kft. – management of call centre voice recordings (registered office: H-1117 Budapest, Budafoki út 79).</p> <p>MOL Limitless Mobility Kft. – customer service administration and complaints handling (registered office: H-1117 Budapest Október huszonharmadika u. 18)</p> <p>MOL Nyrt. – customer service administration and complaints handling (registered office: H-1117 Budapest Október huszonharmadika u. 18)</p>

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	Without the data subject’s consent, the telephone conversation cannot be recorded.	data needed for the payment of potential indemnification (bank account number), vehicle-related data in the case of vehicle damage, in particular the make and year of manufacture of the vehicle, the location and time of e-charging, the identifier and type of the charger used and the type of the charging socket used.	<i>Customers and other data subjects for the purpose of the exercise of legal claims, and successful defence in legal disputes or official proceedings”.</i>		MOL Limitless Mobility Kft. performs the customer service tasks, and is responsible for direct communication with customers. MIS Kft. is responsible for the recording and storage of telephone conversations conducted by MOL Limitless Mobility. MOL Nyrt. only has access to user data if MOL Limitless Mobility Kft. is unable to resolve the arising complaint in its own area of competence and requires technical assistance from MOL Nyrt.
<b>Handling and responding to consumer complaints lodged in writing, via an electronic interface, over the phone or in person, as well as the management of reports and complaints concerning the service</b>	<b>In the case of handling consumer complaints:</b> pursuant to Sections 17/A (2)-(6) of Act CLV of 1997 on Consumer Protection (“Consumer Protection Act”), the Company shall investigate	The data subject's name, address, telephone number and email address, the data contained in the complaint or report, the data needed for the	The Company shall retain the report on the complaint as well as the copy of the Company’s response to the complaint for <b>5 years</b> and present these at the	DR. SZILÁGYI GÁBOR GYÖRGY ÜGYVÉDI IRODA (DR. GÁBOR GYÖRGY SZILÁGYI LAW FIRM) - data processing, debt collection, exercise of	MOL Magyarország Társasági Szolgáltatások Kft. – handling of postal letters (registered office: H-1117 Budapest, Október huszonharmadika utca 18)

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	<p>the complaints of data subjects qualifying as consumers, and if the consumer does not agree with the handling of their complaint or if the complaint cannot be immediately investigated, the Company shall draw up a report on the complaint and its position on the complaint without delay and hand over or send – depending on the nature of the complaint – a copy of it to the consumer.</p>	<p>payment of potential indemnification (bank account number), vehicle-related data in the case of vehicle damage, in particular the make and year of manufacture of the vehicle, the location and time of e-charging, the identifier and type of the charger used and the type of the charging socket used.</p> <p>In addition, the report drawn up on the (consumer) complaint contains the place, time and manner of the lodging of the complaint, the detailed description of the consumer’s complaint, a register of the documents and other evidence presented by the consumer, the</p>	<p>request of the supervisory authority (Section 17/A (7) of the Consumer Protection Act).</p>	<p>legal claims, legal representation H-1122 Budapest Maros u. 48 I/1</p> <p>In case of official requests, the transfer of the data requested by the authority to the authority.</p>	<p>MOL Magyarország Pénzügyi Szolgáltató Kft. – indemnification payments (registered office: H-1117 Budapest, Budafoki út 79)</p> <p>MOL Limitless Mobility Kft. – customer service administration and complaints handling (registered office: H-1117 Budapest Október huszonharmadika u. 18)</p> <p>MOL Nyrt. – customer service administration and complaints handling (registered office: H-1117 Budapest Október huszonharmadika u. 18)</p> <p>TESCO-GLOBAL Áruházak Zrt. – written administration of complaints, then forward to MOL Nyrt. (registered office: 2040 Budaörs, Kinizsi út 1-3.)</p>

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		<p>Company’s statement on its position regarding the consumer’s complaint, and if the immediate investigation of the complaint is possible, the signatures of both the person drawing up the report and the consumer – with the exception of verbal complaints communicated over the phone or via other electronic telecommunications means – , as well as the time and place of drawing up the report.</p>			<p>MOL Limitless Mobility Kft. performs the customer service tasks, and is responsible for direct communication with customers.</p> <p>MOL Nyrt. only has access to user data if MOL Limitless Mobility Kft. is unable to resolve the arising complaint in its own area of competence and requires technical assistance from MOL Nyrt.</p> <p>Tesco-Global Áruházak Zrt. do not handle complaints. They fill out templates.If required- that will be forwarded to MOL Nyrt.</p> <p>Charging station operating partner firm under contract with MOL Nyrt. to operate the given charging station:</p>

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					<p>customer service administration and complaints handling. (The name of the company is displayed at the given charging station in a clearly visible way, and the list of affected partner companies concerned is available at the <a href="http://www.molplugee.hu">www.molplugee.hu</a> website.)</p> <p>Petrus és Petrus Kereskedelmi és Szolgáltató Betéti Társaság (registered office: H-1165 Budapest, Újszász utca 117)</p> <p>Twin Spin Bt. (registered office: H-1045 Bp. Istvántelki út 54. fsz 2.)</p> <p>P&amp;B Oil Bt. (registered office: H-1134 Bp. Angyalföldi út 30-32 A. 7/48)</p> <p>Szívós Anita és társa Bt. (registered office: H-2100</p>

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					<p>Gödöllő Kossuth Lajos utca 12 fszt 7.)</p> <p>Marmátoil Bt. (registered office: H-3053 Kozárd, Boros út 9)</p> <p>CONTIJU Betéti Társaság (registered office: 1047 Budapest, Szabadkai utca 11. 2/12.)</p> <p>Dynamic Petrol Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2030 Érd Gyűszűvirág u. 8)</p> <p>ANDRIKORA'S Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2083 Solymár Terstyánszky út 3521)</p> <p>Simon Tamás egyéni vállalkozó (registered office: 1135 Budapest, Csata utca 25.)</p>

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					<p>In case of complaints lodged in person at the charging station, the associate of the above-listed partner company is responsible for direct communication with customers.</p> <p>MOL Limitless Mobility Kft. is responsible for handling the complaint recorded in the report drawn up on the complaint.</p> <p>MOL Nyrt. only has access to user data if MOL Limitless Mobility Kft. is unable to resolve the arising complaint in its own area of competence and requires technical assistance from MOL Nyrt.</p> <p>CREDITREFORM Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság – receivables management (H-</p>

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					<p>1087 Budapest, Könyves Kálmán körút 76)</p> <p>User data is transferred to the company if the Service Provider has any financial claims against the user.</p> <p>Partners manufacturing chargers, as well as partners involved in the establishment and construction of charging infrastructure (in the event of damage events or complaints, they participate in investigating where the problem arose)</p> <ul style="list-style-type: none"> <li>- DSR Partner Kereskedelmi és Szolgáltató Kft. - H-1117 Budapest, Prielle Kornélia u. 19-35 G.ép. A.lház Fsz.1.</li> <li>- MILE Kft. - H-1104 Budapest Hungary Mádi u. 52</li> <li>- EFACEC Electric Mobility SA -</li> </ul>



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					<p>Portugal Moreira Da Maia Rua Eng. Frederico Ulrich, Guardéiras</p> <ul style="list-style-type: none"> <li>- Siemens Zrt. - H-1143 Budapest, Gizella út 51-57</li> <li>- Greenetik Retail Kft. - H-4032 Debrecen, Böszörményi u. 68. O. ép. fsz 2</li> <li>- AUTÓ SZÉLES Kft. - H-4400 NYÍREGYHÁZA HUNYADI ÚT 57</li> <li>- Schneider Electric Hungária Zrt. - H-1133 Budapest, Váci út 96-98</li> <li>- Treszner Villamos ipari Kft. - H-7630 Pécs, Álmos utca 3/18</li> <li>- Omexom Magyarország Kft. - Törökbálint Tópark utca 1/a</li> </ul>

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					<ul style="list-style-type: none"> <li>- SPIE Hungaria Kft. - H-1116 Budapest, Mezőköved u. 5-7</li> <li>- Etrell d.o.o. - Pod Jelsami 6, 1290 Grosuplje, Slovenia</li> <li>- ABB Mérnöki Kereskedelmi és Szolgáltató Kft. – H-1134 Budapest Kassák Lajos utca 19-25</li> <li>- Elektromotive Hungária Kft. – 1125 Budapest Szalamandra u. 44.</li> </ul>
<p><b>Communication in writing or electronic mail (email) with Customers and data subjects not qualifying as Customers, responding to questions, data reconciliation</b></p>	<p>Article 6 (1) a) of the GDPR – voluntary consent by the data subject, which the data subject grants to the Company by sending their requests and the data contained in them within the scope of responding to the request and resolving the</p>	<p>Personal data contained in the Customer’s request and in written or electronic correspondence (email).</p> <p>In the case of data subjects not qualifying as Customers: the data subject's name, address, telephone number and</p>	<p>These data are retained until the withdrawal of data subject’s consent, or in the absence of such withdrawal for <b>5 years</b> (pursuant to Section 6:22 (1) of the Civil Code), with a view to exercise any potential civil law claims by the Company or to defend against any</p>	<p>DR. SZILÁGYI GÁBOR GYÖRGY ÜGYVÉDI IRODA (DR. GÁBOR GYÖRGY SZILÁGYI LAW FIRM) - data processing, debt collection, exercise of legal claims, legal representation</p>	<p>MOL Magyarország Társasági Szolgáltatások Kft. – handling of postal letters (registered office: H-1117 Budapest, Október huszonharmadika utca 18)</p> <p>MOL Magyarország Pénzügyi Szolgáltató Kft. – indemnification payments</p>

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	<p>problems raised (e.g. provision of information).</p> <p>The data subject is entitled to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of any processing that was conducted based on the consent prior to its withdrawal.</p> <p>Without the data subject’s consent, the Company cannot respond to requests.</p>	<p>email address, the data contained in the complaint or report, the data needed for the payment of potential indemnification (bank account number), vehicle-related data in the case of vehicle damage, in particular the make and year of manufacture of the vehicle, the location and time of e-charging, the identifier and type of the charger used and the type of the charging socket used, as well as data contained in the data subject’s complaint or report.</p>	<p>potential civil law claims by data subjects.</p> <p>In the case of a withdrawal of consent, the Company assumes that the data subject does not intend to exercise any claim relating to the request, the response given to it by the Company, or the communication or data reconciliation with the Company.</p>	<p>H-1122 Budapest Maros u. 48 I/1</p> <p>In case of official requests, the transfer of the data requested by the authority to the authority.</p>	<p>(registered office: H-1117 Budapest, Budafoki út 79)</p> <p>MOL Limitless Mobility Kft. – customer service administration and complaints handling (registered office: H-1117 Budapest Október huszonharmadika u. 18)</p> <p>MOL Nyrt. – customer service administration and complaints handling (registered office: H-1117 Budapest Október huszonharmadika u. 18)</p> <p>MOL Limitless Mobility Kft. performs the customer service tasks, and is responsible for direct communication with customers.</p> <p>MOL Nyrt. only has access to user data if MOL Limitless Mobility Kft. is unable to resolve the arising complaint</p>

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					<p>in its own area of competence and requires technical assistance from MOL Nyrt.</p> <p>Charging station operating partner firm under contract with MOL Nyrt. to operate the given charging station: customer service administration and complaints handling. (The name of the company is displayed at the given charging station in a clearly visible way, and the list of affected partner companies concerned is available at the <a href="http://www.molplugee.hu">www.molplugee.hu</a> website.)</p> <p>Petrus és Petrus Kereskedelmi és Szolgáltató Betéti Társaság (registered office: H-1165 Budapest, Újszász utca 117)</p>

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					<p>ANDRIKORA'S Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2083 Solymár Terstyánszky út 3521)</p> <p>Simon Tamás egyéni vállalkozó (registered office: 1135 Budapest, Csata utca 25.)</p> <p>In case of complaints lodged in person at the charging station, the associate of the above-listed partner company is responsible for direct communication with customers.</p> <p>MOL Limitless Mobility Kft. is responsible for handling the complaint recorded in the report drawn up on the complaint.</p> <p>MOL Nyrt. only has access to user data if MOL Limitless Mobility Kft. is unable to resolve the arising complaint</p>

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					in its own area of competence and requires technical assistance from MOL Nyrt.
<p><b>Data retention pertaining to communication by the Customer Service with Customers and other data subjects for the purpose of the exercise of legal claims, and successful defence in legal disputes or official proceedings</b></p>	<p>Article 6 (1) f) of the GDPR (data processing is necessary for the purposes of the legitimate interests pursued by the Company). Legitimate interest: exercise of claims by the Company, and successful defence in a legal dispute or official proceedings potentially initiated by the Customer. The interest balancing test is available at this link.</p>	<p>Name, address, email address, telephone number, date of birth, the data contained in the complaint or report, bank account number, vehicle-related data in the case of vehicle damage, the location and time of e-charging, the identifier and type of the charger used, the type of the charging socket used, the make and year of manufacture of the vehicle, as well as other data required for the exercise of legal claims or for defence in a legal dispute or official proceedings (for instance, data voluntarily</p>	<p>The Company retains the documents related to communication with the Customer (for instance: emails, letters, paper-based requests) and other requests for <b>5 years</b> (pursuant to Section 6:22 (1) of the Civil Code) after receipt by the Customer Service (in case of emails, when they become accessible; in case of telephone conversations, when they are recorded), with a view to exercise any potential civil law claims of the Company or to defend against any potential civil law claims of the data subject.</p>	<p>DR. SZILÁGYI GÁBOR GYÖRGY ÜGYVÉDI IRODA (DR. GÁBOR GYÖRGY SZILÁGYI LAW FIRM) - data processing, debt collection, exercise of legal claims, legal representation H-1122 Budapest Maros u. 48 I/1</p>	<p>MOL Magyarország Társasági Szolgáltatások Kft. – handling of postal letters (registered office: H-1117 Budapest, Október huszonharmadika utca 18)</p> <p>MOL Magyarország Pénzügyi Szolgáltató Kft. – indemnification payments (registered office: H-1117 Budapest, Budafoki út 79)</p> <p>MOL Limitless Mobility Kft. – (registered office: H-1117 Budapest, Október huszonharmadika u. 18)</p> <p>MOL Nyrt. (registered office: H-1117 Budapest Október huszonharmadika u. 18)</p>

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		<p>provided by the data subject in the given complaint or report).</p> <p>Source of data: Customer Service.</p>	<p>If the processing of a personal data is required for defence in a legal dispute or official proceedings initiated by the data subject or to pursue the Company’s legitimate interest, on the basis of its legitimate interest (Article 6 (1) f) of the GDPR) the Company is entitled to process the given personal data until the final conclusion of such proceedings or the enforcement of the legitimate interest by other means (e.g. out of court settlement), and – if the retention of the full written or electronic document containing the data is not required – it is also entitled to prepare excerpts of the given</p>		<p>MOL Magyarország Pénzügyi Szolgáltató Kft. (registered office: H-1117 Budapest, Budafoki út 79)</p> <p>CREDITREFORM Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság – receivables management (H-1087 Budapest, Könyves Kálmán körút 76)</p> <p>User data is transferred to the company if the Service Provider has any financial claims against the user.</p> <p>Charging station operating partner firm under contract with MOL Nyrt. to operate the given charging station: customer service administration and complaints handling. (The name of the company is displayed at the given charging station in a clearly visible way, and the list of</p>



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			document as per the scope of data required.		<p>affected partner companies concerned is available at the <a href="http://www.molplugee.hu">www.molplugee.hu</a> website.)</p> <p>Petrus és Petrus Kereskedelmi és Szolgáltató Betéti Társaság (registered office: H-1165 Budapest, Újszász utca 117)</p> <p>Twin Spin Bt. (registered office: H-1045 Bp. Istvántelki út 54. fsz 2.)</p> <p>P&amp;B Oil Bt. (registered office: H-1134 Bp. Angyalföldi út 30-32 A. 7/48)</p> <p>Szívós Anita és társa Bt. (registered office: H-2100 Gödöllő Kossuth Lajos utca 12 fszt 7)</p> <p>Marmátoil Bt. (registered office: H-3053 Kozárd, Boros út 9)</p> <p>CONTIJU Betéti Társaság</p>

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					<p>(registered office: 1047 Budapest, Szabadkai utca 11. 2/12.)</p> <p>Dynamic Petrol Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2030 Érd Gyűszűvirág u. 8)</p> <p>ANDRIKORA'S Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2083 Solymár Terstyánszky út 3521)</p> <p>Simon Tamás egyéni vállalkozó (registered office: 1135 Budapest, Csata utca 25.)</p> <p>Partners manufacturing chargers, as well as partners involved in the establishment and construction of charging infrastructure (in the event of</p>

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					<p>damage events or complaints, they participate in investigating where the problem arose)</p> <ul style="list-style-type: none"> <li>- DSR Partner Kereskedelmi és Szolgáltató Kft. - H-1117 Budapest, Prielle Kornélia u. 19-35 G.ép. A.lház Fsz.1</li> <li>- MILE Kft. - H-1104 Budapest Hungary Mádi u. 52</li> <li>- EFACEC Electric Mobility SA – Portugal Moreira Da Maia Rua Eng. Frederico Ulrich, Guardoiras</li> <li>- Siemens Zrt. - H-1143 Budapest, Gizella út 51-57</li> <li>- Greenetik Retail Kft. - H-4032 Debrecen, Böszörményi u. 68 O. ép. fsz 2</li> </ul>

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					<ul style="list-style-type: none"> <li>- AUTÓ SZÉLES Kft. - H-4400 NYÍREGYHÁZA HUNYADI ÚT 57</li> <li>- Schneider Electric Hungária Zrt. - H-1133 Budapest, Váci út 96-98</li> <li>- Treszner Villamos ipari Kft. - H-7630 Pécs, Álmos utca 3/18</li> <li>- Omexom Magyarország Kft. - Törökbálint Tópark utca 1/a</li> <li>- SPIE Hungaria Kft. - H-1116 Budapest, Mezőköved u. 5-7</li> <li>- Etreel d.o.o. - Pod Jelsami 6, 1290 Grosuplje, Slovenia</li> <li>- ABB Mérnöki Kereskedelmi és Szolgáltató Kft. - H-1134 Budapest Kassák Lajos utca 19-25</li> </ul>

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					<ul style="list-style-type: none"> <li>- Elektromotive Hungária Kft. – 1125 Budapest Szalamandra u. 44.</li> </ul>
<ul style="list-style-type: none"> <li>- Prevention, detection and investigation of fraud and abuse related to the Service</li> </ul> <p>The prevention and investigation of fraud and abuse are governed by MOL Group’s Code of Ethics and Business Conduct, Code of Business Partner Ethics and the Rules of Procedure of the Ethics Council (“Code of Ethics”), which are available here: <a href="https://mol.hu/hu/molrol/etika-es-megfeleles/etika/">https://mol.hu/hu/molrol/etika-es-megfeleles/etika/</a>.</p>	<ul style="list-style-type: none"> <li>- Article 6 (1) f) of the GDPR (data processing is necessary for the purposes of the legitimate interests pursued by the data controllers). Legitimate interest: the prevention and detection of irregularities and infringements endangering the assets, business secrets, intellectual property, reputation and goodwill of data controllers or which pose a threat to appropriate work environments based on respect and free from fear and retaliation, and to hold the persons responsible accountable.</li> </ul>	<ul style="list-style-type: none"> <li>- Name, data generated during the conducting of the investigation. The data controllers process the data required for conducting the investigation, such as the card number along with the ‘block data’ otherwise also processed by them (e.g. the name, article number, quantity and price of the Service purchased, time and place of purchase, etc.) in order to uncover and investigate any</li> </ul>	<ul style="list-style-type: none"> <li>- The time required to conduct the investigation, but in any case, no longer than for the participation of buyers in the Multipoint Programme, and for 5 years following the inactivation of the card or the termination of the Multipoint Programme. This is the period during which either party may bring civil law claims against data controllers pursuant to Section 6:22 of the Civil Code.</li> </ul>	<p>In case of official requests, the transfer of the data requested by the authority to the authority.</p>	<p>MOL Magyarország Informatikai Szolgáltató Kft. (H-1117 Budapest, Budafoki út 79.) - provision of IT and server-related services integrally linked to data processing.</p>

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	The interest balancing test is available at this link.	potential abuse of the card, for the period required to conduct such investigation.			

Data controllers and data processors: The privacy notice and the interest balancing test are available at: [www.molplugee.hu/legal](http://www.molplugee.hu/legal).

**Names, registered offices, telephone numbers, websites (where the privacy notices are available) and email addresses of data controllers:**

- **MOL Nyrt.** (registered office: H-1117 Budapest, Október huszonharmadika u. 18, telephone number: +36-1-881-8111, website: [www.molplugee.hu](http://www.molplugee.hu), email address: [info@molplugee.hu](mailto:info@molplugee.hu))
- **Dr. Szilágyi Gábor György Ügyvédi Iroda (Dr. Gábor György Szilágyi Law Firm)**, - data processing, debt collection, enforcement of legal claims, legal representation - H-1122 Budapest Maros u. 48 I/1, email address: [gabor.szilagyi@drhg.hu](mailto:gabor.szilagyi@drhg.hu))

**Contact persons of data controllers:**

- **MOL Nyrt.** - email address: [info@molplugee.hu](mailto:info@molplugee.hu)
- **Dr. Szilágyi Gábor György Ügyvédi Iroda (Dr. Gábor György Szilágyi Law Firm)** – email address: [gabor.szilagyi@drhg.hu](mailto:gabor.szilagyi@drhg.hu)

**Name and contact details of data protection officers at data controllers:**

- **MOL Nyrt.** – email address: [dpo@mol.hu](mailto:dpo@mol.hu)
- **Dr. Szilágyi Gábor György Ügyvédi Iroda (Dr. Gábor György Szilágyi Law Firm)** – email address: [gabor.szilagyi@drhg.hu](mailto:gabor.szilagyi@drhg.hu)

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#### **Persons authorised to access data at the data controller:**

- **Recording of telephone conversations with the Company’s Customer Service:** Employees of the e-mobility organisation.
- **Handling and responding to consumer complaints lodged in writing, electronically (email), over the phone or in person, as well as the management of complaints concerning the service:** Employees of the e-mobility organisation, competent staff members of the Legal Department, employees of the law firm involved in the exercise of legal claims.
- **Communication in writing or electronic correspondence (email) with Customers and data subjects not qualifying as Customers, responding to questions, data reconciliation:** Employees of the e-mobility organisation, competent staff members of the Legal Department, employees of the law firm involved in the exercise of legal claims, employees of the company responsible for receivables management.
- **Data retention pertaining to communication by the Customer Service with Customers and other data subjects for the purpose of the exercise of legal claims:** Employees of the e-mobility organisation, for the purpose of the potential exercise of legal claims and defence in a legal dispute or official proceedings, the competent staff members of the Legal Department, employees of the law firm involved in the exercise of legal claims.

#### **Names, registered offices, telephone numbers, websites (where the privacy notices are available) and email addresses of data processors:**

- **MIS Kft.** – management of call centre voice recordings (registered office: H-1117 Budapest, Budafoki út 79, email address: [miklkiss@msc.mol.hu](mailto:miklkiss@msc.mol.hu))
- **MOL Magyarország Pénzügyi Szolgáltató Kft.:** indemnification payments (registered office: H-1117 Budapest, Budafoki út 79, telephone number: +361-209-0000, website: [www.mol.hu](http://www.mol.hu), email address: [ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu))
- **MOL Magyarország Társasági Szolgáltatások Kft.** – handling of postal letters, indemnification payments (registered office: H-1117 Budapest, Október huszonharmadika utca 18, telephone number: +361-209-0000, website: [www.mol.hu](http://www.mol.hu), email address: [ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu))
- **MOL Limitless Mobility Kft.** – customer service administration and complaints handling (registered office: H-1117 Budapest Október huszonharmadika u. 18; telephone number: +361-886-4444, website: [www.mollimo.hu](http://www.mollimo.hu), email address: [info@mollimo.hu](mailto:info@mollimo.hu))
- **CREDITREFORM Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság** – receivables management (H-1087 Budapest, Könyves Kálmán körút 76), Telephone number: +36 (1) 333 3000, website: [www.creditreform.hu](http://www.creditreform.hu), email address: [creditreform@creditreform.hu](mailto:creditreform@creditreform.hu))

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- **TESCO-GLOBAL Áruházak Zrt.** (registered office: 2040 Budaörs, Kinizsi út 1-3.) – written administration of complaints, then forward to MOL Nyrt.- email address: CE.DPO@tesco-europe.com

The **charging station operating partner firm** under contract with MOL Nyrt. is authorised to operate the given charging station. (The name of the company is displayed at the given charging station in a clearly visible way, and the list of partner companies concerned is available at the [www.molplugee.hu](http://www.molplugee.hu) website) – customer service administration and complaints handling.

- Petrus és Petrus Kereskedelmi és Szolgáltató Betéti Társaság (registered office: H-1165 Budapest, Újszász utca 117) Telephone number: +36 20 2058810
- Twin Spin Bt. (registered office: H-1045 Bp. Istvántelki út 54 fsz 2) telephone number: +36 30 9507245
- P&B Oil Bt. (registered office: H-1134 Bp. Angyalföldi út 30-32 A. 7/48) telephone number: +36 30 6417718
- Szívós Anita és társa Bt. (registered office: H-2100 Gödöllő Kossuth Lajos utca 12 fszt 7) telephone number: +36 30 3702456
- Marmátoil Bt. (registered office: H-3053 Kozárd, Boros út 9) telephone number: +36704116549
- CONTIJU Betéti Társaság (registered office: 1047 Budapest, Szabadkai utca 11. 2/12.)
- Dynamic Petrol Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2030 Érd Gyűszűvirág u. 8)
- ANDRIKORA'S Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2083 Solymár Terstyánszky út 3521)
- Simon Tamás egyéni vállalkozó (registered office: 1135 Budapest, Csata utca 25.)

**Partners manufacturing chargers, partners involved in the establishment and construction of charging infrastructure** – complaints handling, exercise of legal claims. In the event of damage events or complaints, they participate in investigating where the given problem arose.

- DSR Partner Kereskedelmi és Szolgáltató Kft. - H-1117 Budapest, Prielle Kornélia u. 19-35 G.ép. A.lház Fsz.1. telephone number: +36-30-982-50-13, email address: kuhajda@dsr.hu, bata@dsr.hu



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- MILE Kft. - H-1104 Budapest Hungary Mádi u. 52, telephone number: +36-20-978-26-36, email address: [kormendi.tamas@mile-kft.hu](mailto:kormendi.tamas@mile-kft.hu)
- EFACEC Electric Mobility SA – Portugal Moreira Da Maia Rua Eng. Frederico Ulrich, Guardearas, website: [www.efacec.com](http://www.efacec.com), email address: [pedro.domingues@efacec.com](mailto:pedro.domingues@efacec.com), [ricardo.rocha@efacec.com](mailto:ricardo.rocha@efacec.com), [andre.araujo@efacec.com](mailto:andre.araujo@efacec.com),
- Siemens Zrt. - H-1143 Budapest, Gizella út 51-57, telephone number: +36 (1) 471-1000, website: [www.siemens.hu](http://www.siemens.hu), email address: [orsolya.pajer@siemens.com](mailto:orsolya.pajer@siemens.com), [adatvedelmi.hu@siemens.com](mailto:adatvedelmi.hu@siemens.com)
- Greenetik Retail Kft. - H-4032 Debrecen, Böszörményi u. 68 O. ép. fsz 2, telephone number: +36-70-369-47-25, email address: [stefan.baeck@greenetik.eu](mailto:stefan.baeck@greenetik.eu)
- AUTÓ SZÉLES Kft. - H-4400 NYÍREGYHÁZA HUNYADI ÚT 57 telephone number: +36 (42) 508 280, email address: [tszeles@autoszeles.hu](mailto:tszeles@autoszeles.hu)
- Schneider Electric Hungária Zrt. - H-1133 Budapest, Váci út 96-98, telephone number: +361 3822600, website: [www.schneider-electric.hu](http://www.schneider-electric.hu), email address: [gergely.kaszas@schneider-electric.com](mailto:gergely.kaszas@schneider-electric.com)
- Treszner Villamos ipari Kft. - H-7630 Pécs, Álmos utca 3/18 Telephone number: +36 (72) 522 100, email address: [andras.farago@tresznerkft.hu](mailto:andras.farago@tresznerkft.hu)
- Omexom Magyarország Kft. - Törökbálint Tópark utca 1/a Telephone number: +36-30-994-83-72, email address: [zoltan.eiterer@omexom.hu](mailto:zoltan.eiterer@omexom.hu)
- SPIE Hungaria Kft. - H-1116 Budapest, Mezőköved u. 5-7 Telephone number: +36-1-238-48-58, +36-20-66-56-739, email address: [spie@spie-hungaria.hu](mailto:spie@spie-hungaria.hu), [balazs.toro@spie-hungaria.hu](mailto:balazs.toro@spie-hungaria.hu)
- Etrek d.o.o. - Pod Jelsami 6, 1290 Grosuplje, Slovenia Telephone number: +38616010077, +38616010128, email address: [rok.kralj@etrel.si](mailto:rok.kralj@etrel.si)
- ABB Mérnöki Kereskedelmi és Szolgáltató Kft. – H-1134 Budapest Kassák Lajos utca 19-25 Telephone number: +36-20-212-58-69, +36-20-262-01-34, +36-20-346-43-43, email address: [norbert.haray@hu.abb.com](mailto:norbert.haray@hu.abb.com), [istvan.szoboszlai@hu.abb.com](mailto:istvan.szoboszlai@hu.abb.com), [magor.peter@hu.abb.com](mailto:magor.peter@hu.abb.com), [hu-driveservice@abb.com](mailto:hu-driveservice@abb.com).
- Elektromotive Hungária Kft. – 1125 Budapest Szalamandra u. 44. Telephone: +36-30-590-19-30, +36-30-533-45-39, e-mail address: [iluest@t-online.hu](mailto:iluest@t-online.hu), [simon@elektromotive.hu](mailto:simon@elektromotive.hu)

#### Contact persons of data processors:

- **MIS Kft.** – management of call centre voice recordings (registered office: H-1117 Budapest, Budafoki út 79, email address: [miklkiss@msc.mol.hu](mailto:miklkiss@msc.mol.hu))
- **MOL Magyarország Pénzügyi Szolgáltató Kft.** – indemnification payments (registered office: H-1117 Budapest, Budafoki út 79), telephone number: +361-209-0000, website: [www.mol.hu](http://www.mol.hu), email address: [ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu)

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- **CREDITREFORM Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság** – receivables management (H-1087 Budapest, Könyves Kálmán körút 76), telephone number: +36 (1) 333 3000, website: [www.creditreform.hu](http://www.creditreform.hu), email address: [creditreform@creditreform.hu](mailto:creditreform@creditreform.hu))
- **TESCO-GLOBAL Áruházak Zrt.** (registered office: 2040 Budaörs, Kinizsi út 1-3.) – written administration of complaints, then forward to MOL Nyrt email address: [CE.DPO@tesco-europe.com](mailto:CE.DPO@tesco-europe.com))
- Petrus és Petrus Kereskedelmi és Szolgáltató Betéti Társaság (registered office: H-1165 Budapest, Újszász utca 117) Telephone number: +36 20 2058810
- Twin Spin Bt. (registered office: H-1045 Bp. Istvántelki út 54 fsz 2) telephone number: +36 30 9507245
- P&B Oil Bt. (registered office: H-1134 Bp. Angyalföldi út 30-32 A. 7/48) telephone number: +36 30 6417718
- Szívós Anita és társa Bt. (registered office: H-2100 Gödöllő, Kossuth Lajos utca 12 fszt 7, telephone number: +36303702456
- Marmatóil Bt. (registered office: H-3053 Kozárd, Boros út 9) telephone number: +36704116549
- CONTIJU Betéti Társaság (registered office: 1047 Budapest, Szabadkai utca 11. 2/12.)
- Dynamic Petrol Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2030 Érd Gyűszűvirág u. 8)
- ANDRIKORA'S Kereskedelmi és Szolgáltató Betéti Társaság (registered office: 2083 Solymár Terstyánszky út 3521)
- Simon Tamás egyéni vállalkozó (registered office: 1135 Budapest, Csata utca 25.)

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- MILE Kft. - H-1104 Budapest Hungary Mádi u. 52, telephone number: +36-20-978-26-36, email address: kormendi.tamas@mile-kft.hu
- EFACEC Electric Mobility SA – Portugal Moreira Da Maia Rua Eng. Frederico Ulrich, Guardedeiras, website: [www.efacec.com](http://www.efacec.com), email address: pedro.domingues@efacec.com, ricardo.rocha@efacec.com, andre.araujo@efacec.com,
- Siemens Zrt. - H-1143 Budapest, Gizella út 51-57, telephone number: +36 (1) 471-1000, website: [www.siemens.hu](http://www.siemens.hu), email address: orsolya.pajer@siemens.com, adatvedelmi.hu@siemens.com
- Greenetik Retail Kft. - H-4032 Debrecen, Böszörményi u. 68 O. ép. fsz 2, telephone number: +36-70-369-47-25, email address: stefan.baeck@greenetik.eu
- AUTÓ SZÉLES Kft. - H-4400 NYÍREGYHÁZA HUNYADI ÚT 57 telephone number: +36 (42) 508 280, email address: tszeles@autoszeles.hu
- Schneider Electric Hungária Zrt. - H-1133 Budapest, Váci út 96-98, telephone number: +361 3822600, website: [www.schneider-electric.hu](http://www.schneider-electric.hu), email address: gergely.kaszas@schneider-electric.com
- Treszner Villamos ipari Kft. - H-7630 Pécs, Álmos utca 3/18 Telephone number: +36 (72) 522 100, email address: andras.farago@tresznerkft.hu
- Omexom Magyarország Kft. - Törökbálint Tópark utca 1/a Telephone number: +36-30-994-83-72, email address: zoltan.eiterer@omexom.hu
- SPIE Hungaria Kft. - H-1116 Budapest, Mezőköved u. 5-7 Telephone number: +36-1-238-48-58, +36-20-66-56-739, email address: spie@spie-hungaria.hu, balasz.toro@spie-hungaria.hu
- Etrell d.o.o. - Pod Jelsami 6, 1290 Grosuplje, Slovenia Telephone number: +38616010077, +38616010128, email address: rok.kralj@etrel.si+
- ABB Mérnöki Kereskedelmi és Szolgáltató Kft. – H-1134 Budapest Kassák Lajos utca 19-25 Telephone number: +36-20-212-58-69, +36-20-262-01-34, +36-20-346-43-43, email address: norbert.haray@hu.abb.com, istvan.szoboszlai@hu.abb.com, magor.peter@hu.abb.com, [hu-driveservice@abb.com](mailto:hu-driveservice@abb.com).

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- Elektromotive Hungária Kft. – 1125 Budapest Szalamandra u. 44. Telephone: +36-30-590-19-30, +36-30-533-45-39, e-mail address: [iluest@t-online.hu](mailto:iluest@t-online.hu), [simon@elektromotive.hu](mailto:simon@elektromotive.hu)

#### **Name and contact details of data protection officers at data processors:**

- **MIS Kft.** – [dpo@mol.hu](mailto:dpo@mol.hu)
- **MOL Magyarország Pénzügyi Szolgáltató Kft.:** [dpo@mol.hu](mailto:dpo@mol.hu)
- **MOL Magyarország Társasági Szolgáltatások Kft.** – [dpo@mol.hu](mailto:dpo@mol.hu)
- **MOL Limitless Mobility Kft.** – [dpo@mol.hu](mailto:dpo@mol.hu)
- **CREDITREFORM Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság** – Dávid Nagy, [info@prodebt.hu](mailto:info@prodebt.hu)
- **TESCO-GLOBAL Áruházak Zrt.** (registered office: 2040 Budaörs, Kinizsi út 1-3.) – [CE.DPO@tesco-europe.com](mailto:CE.DPO@tesco-europe.com)
- **charging station operating partner firms:**
  - o Petrus és Petrus Kereskedelmi és Szolgáltató Betéti Társaság: -
  - o Twin Spin Bt.: –
  - o P&B Oil Bt. –
  - o Szívós Anita és társa Bt. –
  - o Marmátoil Bt.-
  - o CONTIJU Bt.
  
  - o Dynamic Petrol Ker. és Szolg. Bt.
  - o ANDRIKORA’S Ker. és Szolg. Bt.
  
  - o Simon Tamás EV.
- **partner companies manufacturing chargers, partners involved in the establishment and construction of charging infrastructure:**
  - o DSR Partner Kereskedelmi és Szolgáltató Kft. – Miklós Bicskei (+36-30-982-50-13, [bicskei@dsr.hu](mailto:bicskei@dsr.hu))
  - o MILE Kft. –
  - o EFACEC Electric Mobility SA –
  - o Siemens Zrt. –

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- Greenetik Retail Kft. –
- AUTÓ SZÉLES Kft. – Krisztián Bölcskei (+36-31-781-2012, info@adatvedelmiauditor.hu)
- Schneider Electric Hungária Zrt. –
- Treszner Villamos ipari Kft.
- Omexom Magyarország Kft. - Vencel Dögei (vencel.dogei@omexom.hu)
- SPIE Hungaria Kft.
- Etrek d.o.o.
- ABB Mérnöki Kereskedelmi és Szolgáltató Kft
- Elektromotive Hungária Kft.

#### **Persons authorised to access data at the data processors:**

- **MIS Kft.** – IT associate
- **MOL Magyarország Pénzügyi Szolgáltató Kft.:** financial associate
- **MOL Magyarország Társasági Szolgáltatások Kft.** – mail opening associate
- **MOL Limitless Mobility Kft.** – customer service associate
- **CREDITREFORM Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság** – receivables management associate
- **TESCO-GLOBAL Áruházak Zrt.** – customer service associate
- **charging station operating partner firms:**
  - Petrus és Petrus Kereskedelmi és Szolgáltató Betéti Társaság – company employees
  - Twin Spin Bt. – company employees
  - P&B Oil Bt. – company employees
  - Szívós Anita és társa Bt. – company employees
  - Marmátoil Bt. – company employees
  - CONTIJU Bt.- company employees
  - Dynamic Petrol Ker. és Szolg. Bt. – company employees
  - ANDRIKORA’S Ker. és Szolg. Bt. – company employees
  - Simon Tamás EV. – company employees

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- **partner companies manufacturing chargers, partners involved in the establishment and construction of charging infrastructure:**
  - DSR Partner Kereskedelmi és Szolgáltató Kft. – company employees
  - MILE Kft. – company employees
  - EFACEC Electric Mobility SA – company employees
  - Siemens Zrt. – company employees
  - Greenetik Retail Kft. – company employees
  - AUTÓ SZÉLES Kft. – company employees
  - Schneider Electric Hungária Zrt. – company employees
  - Treszner Villamos ipari Kft. – company employees
  - Omexom Magyarország Kft. – company employees
  - SPIE Hungaria Kft. – company employees
  - Etrell d.o.o. – company employees
  - ABB Mérnöki Kereskedelmi és Szolgáltató Kft. – company employees
  - Elektromotive Hungári Kft. company employees

**Processing of sensitive personal data for the purposes specified in this Notice:** no sensitive data are processed.

**Data transfer to third countries:** no data transfer is carried out to third countries.

**The existence of automated decision-making, including profiling, and, at least in those cases, comprehensible information about the logic applied, as well as the significance and the envisaged consequences of such processing for the data subject:** no automated decision-making or profiling is carried out.

**Data security measures:**

The Company designs and implements data processing operations so as to ensure protection of the privacy of data subjects in the course of implementing the GDPR and other laws on data processing.

The Company ensures the security of data, and takes the technical and organisational measures and develop the procedural rules required for enforcing the GDPR as well as other rules on the protection of data and secrets.

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The Company protects the data by measures proportionate to risks in particular against unauthorised access, alteration, forwarding, disclosure, deletion or destruction, as well as accidental loss and damage, and inaccessibility due to a change in the technology used. In this framework, the Company stores the data subject’s personal data in a password-protected and/or encrypted data base. In the framework of risk-proportionate protection, the Company protects data with firewalls, anti-virus software, encryption mechanisms, content filtering and other technological and process solutions. It continuously monitors personal data breaches.

#### **Your rights concerning data processing:**

Your data protection rights and possibilities of legal remedy and their limitations are detailed in the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR): You may request at any time information on your data, request the rectification or erasure of your personal data or the restriction of processing or otherwise object to processing based on legitimate interest. The following is a summary of the key provisions.

The Company draws attention to the following in particular during the provision of information: **You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which the Company pursues in its legitimate interest. In this case, the Company may no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing that override your interests, rights and freedoms, or which are related to the establishment, exercising or defence of legal claims.**

#### **Right to receive information:**

If the Company is processing personal data concerning you, the Company shall provide information to you – even without a request to this effect by you – on the key characteristics of data processing, thus on the purpose, legal basis and duration of processing; the identity and contact details of the Company and its representative; the contact details of the data protection officer; the recipients of personal data; if processing is based on legitimate interest, the legitimate interest of the Company and/or third parties; and on your rights and legal remedy options (including the right to lodge a complaint with the supervisory authority) and, furthermore, if you are not the source of data, on the source of personal data and the categories of the personal data concerned, if you do not yet have this information. The Company provides the information by making this Notice available to you.

#### **Right of 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 the following information: the purposes of the processing; the categories of personal data concerned; the recipients of

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personal data, the (envisaged) duration of data processing, the data subject’s rights and legal remedy options (including the right to lodge a complaint with the supervisory authority), as well as information on the source of the data if such data is not collected from you.

Upon your request, the Company provides you with a copy of the personal data undergoing processing. For any further copies requested, the Company may charge a reasonable fee based on administrative costs. Where you make the request by electronic means, and unless otherwise requested by you, the information is provided in a commonly used electronic form. The right to obtain a copy may not adversely affect the rights and freedoms of others.

Such information is provided free of charge if the party requesting the information has not submitted to the data controller any application for information relating to the same scope of data before within the same year. For offline users, the costs of the second request: HUF 500 (which amount includes postage and CD costs).

If you request the voice recording taken at the customer service to be made available, the data controller makes the requested recording available in the following manner.

For online users: The encrypted file is sent through the Secure Data Room. The key required to listen to the recording is made available by the data controller via SMS.

For offline users: the voice recording is copied to a CD as an encrypted file, which CD is then sent to the customer. The key required to listen to the recording is made available by the data controller via SMS.

**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 shall erase personal data without undue delay where certain grounds apply. Inter alia, the Company shall erase your personal data at your request if these are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw the consent on which the processing is based and there is no other legal ground for the processing; you object to the processing and there are no overriding legitimate grounds for the processing; the personal data have been unlawfully processed; 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.



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The above do 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 that stipulates the processing of the personal data, applicable under European Union or Member State laws 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; or
- 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 on the basis of the above, such personal data is, with the exception of storage, only 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 in the European Union or a Member State.

If you have obtained restriction of processing, you will be informed by the Company before the restriction of processing 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 personal data concerning you which the Company pursues in its legitimate interest. In this case, the Company may no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing that override your interests, rights and freedoms, or which are related to the establishment, exercising or defence of legal claims.**

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### **The framework for exercising rights:**

The Company provides information on action taken on a request relating to the above-listed 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 informs you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you make the request by electronic means, and unless otherwise requested by you, the information, if possible, is provided by electronic means.

If the Company does not take action on your request, the Company informs you without delay and at the latest within one month of receipt of the request on the reasons for not taking action and on the possibility of lodging a complaint with the supervisory authority (in Hungary, with 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, telephone number: +36 1 391 1400, fax: +36-1-391-1410, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: <http://naih.hu/>.

The above information is to 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 any other administrative or judicial remedy, you 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 of the place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR. You have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning you. You also have the right to an effective judicial remedy where the supervisory authority does not handle the complaint or does not inform you within three months on the progress or outcome of the complaint lodged by you. Proceedings against the supervisory authority must 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 have the right to an effective judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company or any of its data processor partners must be brought before the courts of the Member State where the supervisory authority is established. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

In Hungary, regional courts have jurisdiction in such legal proceedings. Information on the competence, jurisdiction and contact details of the courts is available at: [www.birosag.hu](http://www.birosag.hu).

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The court may order the Company to provide the information, to rectify, restrict and/or erase the data, to annul the decision made by automated data processing, and to consider your right to object. The court may order public disclosure of its ruling in a manner that allows for the identification of the Company or any of its partners along with the committed infringement.

You may also request that the data controller responsible for the material or non-material damage (thus, also the Company, if the case may be) or the data processor compensate you for damage incurred in connection with unlawful data processing (including failure to take data security measures). The data processor is liable for the damage caused by data processing only where it has not complied with the obligations of the GDPR specifically directed to data processors or where it has acted outside or contrary to lawful instructions of the Company. If the above persons infringe your personal rights by unlawfully processing your data or by violating data security requirements, you may claim restitution. The Company and its data controller or data processor partners are exempted from liability if they prove that they are not in any way responsible for the event giving rise to the damage.