

## Data processing notice

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The **National Toll Payment Services Private Company Limited by Shares** (registered office: 1134 Budapest, Váci út 45. B, company registration number: 01-10-043108, tax number: 12147715-2-44, e-mail: [ugyfel@hu-go.hu](mailto:ugyfel@hu-go.hu) (for cases related to the distance-based electronic toll system (HU-GO)) and [ugyfel@nemzetiutdij.hu](mailto:ugyfel@nemzetiutdij.hu) (for cases related to the time-based road use system); website: [www.toll-charge.hu](http://www.toll-charge.hu) (hereinafter referred to as the “**website**”); phone number: **+36 (36) 587-500**; hereinafter referred to as **Data Controller**), is publishing the *summary tables* below in compliance with the relevant legislative provisions on the protection of personal data<sup>1</sup> and to provide an overview of its data processing activities. More detailed information, including the data processor used during data processing, is available in data processing statements available via separate interfaces (under the data privacy menu item of the website).

The Data Controller provides toll payment services to Hungarian public road users. The Data Controller is vigilant in protecting personal data, and shall ensure fair and transparent data processing at all time, the basic requirement for which is providing adequate information on data processing. The Data Controller provides information on its data processing in the course of providing its service: information on the source and scope of access to the processed data, contact details of the Data Protection Officer, the legal basis, purpose and duration of data processing, personal data rights and choices, and all contact information where the contracted toll payer, the road user and the motor vehicle operator (hereinafter: **User**) can receive answers to their questions regarding the Data Controller’s data protection processes.

The Data Controller’s data processing activities are as follows:

- registration on the website for cases related to the distance-based electronic toll system;
- registration on the website for cases related to the time-based road use system;
- customer service by phone, in person and in writing;
- claims for fines;
- imposing fines;
- toll collection operators;
- e-vignette purchases;
- toll collection;
- the use of cookies on the website;
- fulfillment of the document retention obligation.

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation); The text of the GDPR is available [here](#) in all official languages of the European Union.

## I. Data processing performed by the Data Controller with respect to a distance-based electronic toll system

<b>REGISTRATION ON THE WEBSITE</b>	
<b>Summary of the data processing activities performed by the Data Controller related to the User's registration on the website regarding the distance-based electronic toll system</b>	
<b>Purpose of data processing</b>	registration on the website
<b>Legal basis for data processing</b>	User's consent [Article 6 (1) a) of the GDPR]; <i>consent may be withdrawn at any time</i>
<b>Scope of the processed data</b>	User's name; User's password; User's e-mail address; User's notification phone number (capable of receiving and sending SMS); User's address (country, postal code, city, street name, house number, door); international vehicle registration code, registration number, EURO code and (environmental) category of the User's motor vehicle; phone number assigned to the User's vehicle; User's account number  The name, telephone number and e-mail address of the company's/organisation's contact person
<b>Duration of data processing</b>	Withdrawal of the User's consent

<b>FOR THE PURPOSE OF COLLECTING THE DISTANCE-BASED TOLL</b>	
<b>Summary of data processing performed by the Data Controller related to the distance-based electronic toll system for the purpose of toll collection</b>	
<b>Purpose of data processing</b>	The efficient collection of tolls for the use of distance-based tolled road sections with motor vehicles and motor vehicle combinations in the toll road use system within a specific period
<b>Legal basis for data processing</b>	<b>Compliance with the Data Controller's legal obligations</b> [Article 6 (1) (c) of the GDPR; Articles 33/A (1) and (6) of Act I of 1988 on Road Transport; Article 26 of Act LXVII of 2013 on distance-based tolls payable for the use of motorways, expressways and main roads]
<b>Scope of the processed</b>	User's name; User's address; User's mother's name; User's place and date of birth; User's e-mail address; User's phone number;

<p><b>data</b></p>	<p>User's payment account number; Details of the User's personal identification documents; Rate of toll payable by the User; Place and date of the User's road use; Place and date of the User's toll payment; Registration number of a User's motor vehicle or motor vehicle combination; Characteristics of the User's vehicle or motor vehicle combination to determine the toll category; Identification data of the User's registered on-board units; Photo of the User's vehicle and its official marking; the User's route if the unit tolled sections are used based on a route ticket as well as the authorised period for road use and the document number; the gross weight, axle load and size of the User's motor vehicle or motor vehicle combination</p>
<p><b>Duration of data processing</b></p>	<p>The Data Controller shall process the data as stipulated in Article 6 (5) and for the purpose of performing its tasks outlined in Article 7 of Act LXVII of 2013 on the distance-based electronic toll for the use of motorways, expressways and main roads, until the <b>expiry of the claim for the payment of the fee.</b></p> <p>The Data Controller shall process the data as stipulated in Article 6 (4), for the purpose of performing its tasks outlined in Article 17 of Act LXVII of 2013 on the distance-based electronic toll for the use of motorways, expressways and main roads, to enable the state tax and customs authorities to perform their duties as stipulated by law, and to fulfil its data reporting obligation to the National Axle Load Measuring System, for <b>the following durations:</b></p> <p>a) for <b>seven years</b> from the date the data is generated:</p> <p>The amount of the fine to be paid by the User; Place and date of the User's road use; Place and date of the User's toll payment; Registration number of a User's motor vehicle or motor vehicle combination; Characteristics of the User's vehicle or motor vehicle combination to determine the toll category; Identification data of the User's registered on-board units; the User's route if the unit tolled sections are used based on a route ticket as well as the authorised period for road use and the document number</p> <p>b) for <b>360 days</b> from the date the data is generated:</p> <p>Photo of the User's vehicle and its official marking, if the User has road use authorisation</p> <p>c) for <b>two years</b> from the date the data is generated:</p> <p>Photo of the User's vehicle and its official marking, if the User does not have road use authorisation</p> <p>d) for <b>3 days</b> following data transfer:</p> <p>the User's route, if the unit tolled sections are used based on a</p>

	route ticket as well as the authorised period for road use and the document number; data regarding the transit speed of the User's vehicle
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<b>FOR THE PURPOSE OF ENFORCEMENT OF THE DISTANCE-BASED FINE</b>	
<b>Summary of data processing by the Data Controller related to the electronic toll system, for the purpose of fine enforcement</b>	
<b>Purpose of data processing</b>	The enforcement of fines for the unauthorised use of unit tolled road sections with motor vehicles and combination of motor vehicles in the toll road use system within a specific period
<b>Legal basis for data processing</b>	<b>Compliance with the Data Controller's legal obligations</b> [Article 6 (1) (c) of the GDPR; Articles 33/A (1) and (6) of Act I of 1988 on Road Transport; Article 26 of Act LXVII of 2013 on distance-based tolls payable for the use of motorways, expressways and main roads]
<b>Scope of the processed data</b>	User's name; User's address; User's mother's name; User's place and date of birth; User's e-mail address; User's phone number; User's payment account number; Details of the User's personal identification documents; The amount of the fine to be paid by the User; Place and date of the User's road use; Place and date of the User's toll payment; Registration number of a User's motor vehicle or motor vehicle combination; Characteristics of the User's vehicle or motor vehicle combination to determine the toll category; Identification data of the User's registered on-board units; Photo of the User's vehicle and its official marking; the User's route if the unit tolled sections are used based on a route ticket as well as the authorised period for road use and the document number; the gross weight, axle load and size of the User's motor vehicle or motor vehicle combination
<b>Duration of data processing</b>	<p>The Data Controller shall process the data as stipulated in Article 6 (5) and for the purpose of performing its tasks outlined in Article 7 of Act LXVII of 2013 on the distance-based electronic toll for the use of motorways, expressways and main roads, until the <b>expiry of the claim for the payment of the fee.</b></p> <p>The Data Controller shall process the data as stipulated in Article 6 (4), for the purpose of performing its tasks outlined in Article 17 of Act LXVII of 2013 on the distance-based electronic toll for the use of motorways, expressways and main roads, to enable the state tax and customs authorities to perform their duties as stipulated by law, and to fulfil its data reporting obligation to the National Axle Load Measuring System, for <b>the following durations:</b></p>

	<p>a) for <b>seven years</b> from the date the data is generated:</p> <p>The amount of the fine to be paid by the User; Place and date of the User's road use; Place and date of the User's toll payment; Registration number of a User's motor vehicle or motor vehicle combination; Characteristics of the User's vehicle or motor vehicle combination to determine the toll category; Identification data of the User's registered on-board units; the User's route if the unit tolled sections are used based on a route ticket as well as the authorised period for road use and the document number</p> <p>b) for <b>360 days</b> from the date the data is generated:</p> <p>Photo of the User's vehicle and its official marking, if the User has road use authorisation</p> <p>c) for <b>two years</b> from the date the data is generated:</p> <p>Photo of the User's vehicle and its official marking, if the User does not have road use authorisation</p> <p>d) for <b>3 days</b> following data transfer:</p> <p>the User's route, if the unit tolled sections are used based on a route ticket as well as the authorised period for road use and the document number; data regarding the transit speed of the User's vehicle</p>
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<b>SERVICES AVAILABLE VIA A TOLL DECLARATION OPERATOR AND A RESELLER</b>	
<b>Summary of data processing performed by the Data Controller related to the distance-based electronic toll system for the purpose of providing services available via a reseller</b>	
<b>Purpose of data processing</b>	<p>Providing services available via a reseller in the distance-based electronic toll system, specifically</p> <ul style="list-style-type: none"> <li>– sale of pre-paid road toll service through the topping up of the toll balance to contracted toll payers that have a contract in place with the bound service provider,</li> <li>– sale of route tickets,</li> <li>– sale of on-board units provided by the Data Controller's toll declaration operator or delivery or assistance in the delivery of such units to contracted toll payers</li> </ul>
<b>Legal basis for data processing</b>	<b>Performance of the contract</b> between the Data Controller and the User [Article 6 (1) b) of the GDR]
<b>Scope of the processed data</b>	Password of the User (contracted toll payer) entered during registration; User's (contracted toll payer) e-mail address; User's (contracted toll payer) phone number; Details of the User's (contracted toll payer) contractual contact person (name, phone

	number, email address); Notification address, phone number, e-mail address, contact person's name provided by the User (contracted toll payer) related to the toll account; User's (contracted toll payer) billing address; low balance notification limit of the User (contracted toll payer) if low balance notification is requested for the toll account
<b>Duration of data processing</b>	The total duration of the Data Controller's service provision and the enforceability of general civil claims: five years

## II. Data Controller's data processing activities related to the time-based road use system

<b>REGISTRATION ON THE WEBSITE</b>	
<b>Summary of the data processing activities performed by the Data Controller related to the User's registration on the website regarding the time-based road use system</b>	
<b>Purpose of data processing</b>	registration on the website
<b>Legal basis for data processing</b>	User's consent [Article 6 (1) a) of the GDPR]; <i>consent may be withdrawn at any time</i>
<b>Scope of the processed data</b>	User's e-mail address; User's password; Language of communication with the User; User's international vehicle registration code and registration number; User's name; User's address (country, postal code, city, name of public area, type of public area, house number, building, staircase, floor)
<b>Duration of data processing</b>	Withdrawal of the User's consent

<b>FOR THE PURPOSE OF COLLECTING THE TIME-BASED TOLL</b>	
<b>Summary of the Data Controller's data processing activities for collecting the user charges payable for the use of the national public toll roads related to the time-based road use system</b>	
<b>Purpose of data processing</b>	Collection of the user charges payable for the use of toll national public roads and expressways with motor vehicles and trailers for a specific period of time in the time-based road use system
<b>Legal basis for data processing</b>	<b>Exercising the Data Controller's official authority</b> [Article 6 (1) e) of the GDPR; Articles 33/A (1) and (6) of Act I of 1988 on Road Transport; Articles 1 and 4 (2a) of Decree 36/2007 (III.26.) of the Ministry of Economy and Transport (GKM) on the user charges payable for the use of motorways, expressways and

	main roads
<b>Scope of the processed data</b>	Registration number of the User's vehicle; International vehicle registration code of the User's vehicle; Toll category as determined by the User (buyer) based on the vehicle registration certificate or other authentic document issued for the vehicle; Starting date of the validity period of the User's authorisation for the toll road network; Date and time of the User's purchase of road use authorisation; designation of the point of sale; Photo of the User's vehicle and its official marking.
<b>Duration of data processing</b>	Enforceability of general civil claims: five years

### FOR THE ENFORCEMENT OF A FINE CLAIM

#### Summary of the Data Controller's data processing activities related to the time-based road use system to enforce a fine claim

<b>Purpose of data processing</b>	The enforcement of <b>fine claims</b> and <b>verified cost claims</b> related to the collection of the fine, in the event of a failure to pay user charges payable for the use of toll national public roads and expressways with motor vehicles and trailers for a specific period of time in the time-based road use system
<b>Legal basis for data processing</b>	<b>Compliance with the Data Controller's legal obligations</b> [Article 6 (1) (c) of the GDPR]; Articles 33/B (4) and 21/L. (2) of Act I of 1988 on Road Transport; Article 7/A (7) of Decree 36/2007 (III.26.) of the Ministry of Economy and Transport (GKM) on the user charges payable for the use of motorways, expressways and main roads; Act I of 1988
<b>Scope of the processed data</b>	User's name; User's address; Vehicle registration certificate of the User's motor vehicle; Registration number of the User's motor vehicle; International vehicle registration code of the User's motor vehicle; Toll category of the User's motor vehicle; Any other data identifying the User's motor vehicle; Photo of the User's vehicle and its official marking; Personal data made available by the User upon a mobile inspection carried out by the Data Controller; Photo of the User's vehicle and its official marking.
<b>Duration of data processing</b>	Upon expiration of a <b>60-day</b> limitation period from the date on which the identity of the User (operator) becomes known, the Data Controller shall mail the payment notice unless the User (operator) who had failed to pay the fine on the spot signs and accepts the record of the inspection created during the on-site

	inspection [Article 33/B (5) of Act I of 1988 on Road Transport] If the identity of the User (operator) remains unknown, until the fine claim expires: <b>for two years</b> .
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### III. Customer Service related data processing

<b>CALL CENTRE</b>	
<b>Summary of data processing activities performed by the Data Controller in relation to the Call Centre</b>	
<b>Purpose of data processing</b>	Investigating complaints submitted by the Data Controller on the User's behalf, compliance with consumer protection regulations, and implementing effective and customer-friendly administration procedures
<b>Legal basis for data processing</b>	<b>Compliance with the Data Controller's legal obligations</b> [Article 6 (1) c) of the GDPR; Article 17/B (3) of the Consumer Protection Act]
<b>Scope of the processed data</b>	User's last name; User's first name; User's registration number; User's address; Content of User's complaint; Other data provided by the User (in particular, vehicle registration certificate, motor vehicle sales contract or other contract for the use of the motor vehicle); Unique ID number of the complaint; Place and date of complaint submission; Method of filing the complaint; List of records, documents and other evidence submitted by the User; Content of the complaint; Content of the Report; Place and date of the report's creation; Response to the complaint; User's email address; User's phone number; Unique ID number of the voice recording
<b>Duration of data processing</b>	The Data Controller shall retain the processed data for a period of five years [Article 17/B (3) of the Consumer Protection Act]

<b>PERSONAL CUSTOMER SERVICE</b>	
<b>Summary of data processing activities performed by the Data Controller related to the personal customer service</b>	
<b>Purpose of data processing</b>	Investigating complaints submitted by the Data Controller on the User's behalf, compliance with consumer protection regulations, and implementing effective and customer-friendly administration procedures
<b>Legal basis for data</b>	<b>Enforcement of the Data Controller's legitimate interests</b>



<b>processing</b>	[Article 6 (1) (f) of the GDPR]: - regarding voice recordings  <b>Compliance with the Data Controller's legal obligations</b> [Article 6 (1) (c) of the GDPR; Article 17/A. (2) and (3) (a) of the Consumer Protection Act] - concerning the investigation of a complaint
<b>Scope of the processed data</b>	<u>With regard to voice recordings:</u> User's voice; Information provided by the User to the customer service <u>With regards to the investigation of the complaint:</u> User's last name; User's first name; User's registration number; User's address; Content of User's complaint; Other data provided by the User (in particular, vehicle registration certificate, motor vehicle sales contract or other contract for the use of the motor vehicle); Unique ID number of the complaint; Place and date of complaint submission; Method of filing the complaint; List of records, documents and other evidence submitted by the User; Content of the complaint; Content of the Report; Place and date of the report's creation; Response to the complaint; User's email address; Signatures of the person creating the report and the User
<b>Duration of data processing</b>	<u>With regard to voice recordings:</u> The Data Controller retains the processed data for five years <u>With regards to the investigation of the complaint:</u> The processed data, including in particular the report of the User's complaint and a copy of the reply, shall be retained by the Data Controller for a period of five years [Article 17/A (7) of the Consumer Protection Act]

### CUSTOMER SERVICE IN WRITING

#### Summary of the data processing activities performed by the Data Controller in relation to customer service in writing

<b>Purpose of data processing</b>	Investigating complaints submitted by the Data Controller on the User's behalf, compliance with consumer protection regulations, and implementing effective and customer-friendly administration procedures
<b>Legal basis for data processing</b>	<b>Compliance with the Data Controller's legal obligations</b> [Article 6 (1) c) of the GDPR; Article 17/A (6) of the Consumer Protection Act]
<b>Scope of the processed data</b>	User's last name; User's first name; User's registration number; User's address; Content of User's complaint; Other data

	provided by the User (in particular, vehicle registration certificate, motor vehicle sales contract or other contract for the use of the motor vehicle); Unique ID number of the complaint; Place and date of complaint submission; Method of filing the complaint; List of records, documents and other evidence submitted by the User; Content of the complaint; Content of the Report; Place and date of the report's creation; Response to the complaint; User's email address; Signatures of the person creating the report and the User
<b>Duration of data processing</b>	The processed data, in particular the report on the User's complaint and the copy of the reply, shall be retained by the Data Controller for a period of five years [Article 17/A (7) of the Consumer Protection Act]

#### IV. The Data Controller's other data processing activities

<b>Summary of the data processing activities performed by the Data Controller regarding cookies</b>	
<b>Purpose of data processing</b>	Adapting the Data Controller's services to the User's needs by collecting and storing information about the preferences, personal settings, and identification of the User through their browsing on the website
<b>Legal basis for data processing</b>	User's consent [Article 6 (1) a) of the GDPR]. <i>Consent can be withdrawn at any time.</i>
<b>Scope of the processed data</b>	<b>See Cookie notice</b>
<b>Duration of data processing</b>	If the Data Subject provides his or her consent to the use of cookies, until consent is withdrawn

<b>OBLIGATION TO RETAIN THE DOCUMENT</b>	
<b>Summary of the data processing activities performed by the Data Controller for the purposes of meeting its document retention obligations</b>	
<b>Purpose of data processing</b>	Performance of the Data Controller's obligation for document retention
<b>Legal basis for data processing</b>	Compliance with the Data Controller's legal obligations [Article 6 (1) c) of the GDPR]
<b>Scope of the processed</b>	Financial accounting documents underlying accounting records

<b>data</b>	
<b>Duration of data processing</b>	The accounting documents directly or indirectly underlying the accounting records closely related to the sale of the Data Controller's products, such as personal data relating to the fulfillment of the Data Controller's document retention obligations, shall be retained for eight years [Article 169 (2) of the Accounting Act]