

## **NOTICE ON THE PROCESSING OF PERSONAL DATA FOR THE CONTRACTUAL PARTNERS OF NATIONAL TOLL PAYMENT SERVICES PLC.**

**Dear Partner,**

The purpose of this notice is to provide sufficiently detailed and clear information regarding the **processing** (hereinafter: “**Data Processing**”) of the personal data of **contractual contact persons** (hereinafter: “**data subjects**”)—listed in the contracts concluded by National Toll Payment Services Plc. (hereinafter: “**NTPS Plc.**” or “**Company**”) and employed by NTPS Plc. or any of their contractual partners—by NTPS Plc.’s duly authorized employees.

### **I. Legal background**

As NTPS Plc.’s contracts include clauses specifying communication between the contractual partners, and said clauses include the data necessary for communicating with the assigned contact persons, in the course of its data processing, NTPS Plc. is required to comply with the provisions of Act CXII of 2011 on informational self-determination and the freedom of information (Info Act), as well as of 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), and with any other applicable civil laws and regulations in force.

### **II. Basic terminology of data protection**

**Personal data** means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Data Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**III. Scope, legal basis, purpose and duration of data processing, persons involved in data processing**

Description of personal data	Purpose of data processing	Legal basis for data processing	Duration of data processing
The <i>name, job title, workplace phone number (landline), workplace fax number, company mobile phone number, and company e-mail address</i> (which, for the employees of NTPS Plc., also includes their full name) of the employees of NTPS Plc. and their contractual partners	Contractual communication (regulated, single-channel) between the contractual partners	The legitimate interests of both NTPS Plc. and its contractual partners, as well as the consent of the data subject	<p>The data are used for communication purposes until the termination of the contract (except if the employment relationship of the employee in question is terminated before that date, in which case the data are used until the termination of the employment relationship in question)</p> <p>The contract and all contact information contained therein will be retained and stored for the mandatory archiving period prescribed for the contract, possibly even after the data processing purpose of the communication has been achieved</p>

NTPS Plc. does not use a data processor during data processing.

NTPS Plc. shall not disclose the aforementioned personal data to any third parties, unless legally mandated to do so. However, **the Public Procurement Act obliges NTPS Plc. to disclose all contracts entered into as a result of a public procurement procedure** and, therefore, the data of the contact persons listed in the contracts, which shall then likewise become public and available to all.

If, in the course of requesting data of public interest, a person requests access to a contract that NTPS Plc. is obligated to provide as per the prevailing laws and regulations, NTPS Plc. shall obscure the data of the contact persons in said contract, and will not provide the requestor with that information.

All NTPS Plc. employees authorised to access NTPS Plc.'s contract registry can see the data of the contractual contact persons (this is reasonable and justified, since any employee's work may require them to put a question to the assigned contact person regarding the company's contracts).

Assigned employees of the organisation exercising ownership rights over NTPS Plc., as well as those of the organisation responsible for the professional supervision and control of NTPS Plc.'s operations are entitled to access the contracts of NTPS Plc., which requires the access of said employees to the

contractual clauses regarding the contractual contact persons, in order to enable them to put and answer questions regarding the contract in a targeted and efficient manner.

NTPS Plc. and its contractual partners shall record the obligation and corresponding undertaking to process the personal data of contact persons in accordance with the GDPR and other applicable data protection laws and regulations in their contracts, shall adequately inform their employees thereof, and shall obtain the consent of data subjects to the processing of their data.

#### **IV. Rights of the data subject related to data processing**

The data subject has the following rights and enforcement options regarding data processing:

1. **Right to information.** Pursuant to Article 15(1) of the GDPR, the data subject may request information concerning the personal data processed by NTPS Plc. In this event, NTPS Plc. sends the following information to the address (e-mail, postal address) specified by the data subject:

- the data subject’s personal data processed;
- the purpose of data processing;
- the duration of data processing;
- the data subject’s rights regarding data processing;
- the right to file a complaint addressed to the National Authority for Data Protection and Freedom of Information (hereinafter: “the Authority”).

Please send your request for information via registered or receipt mail addressed to NTPS Plc. (address: H-2101 Gödöllő Pf.: 148) or by e-mail to our customer service at [ugyfel@nemzetiudij.hu](mailto:ugyfel@nemzetiudij.hu).

2. **Right to obtain a copy.** Pursuant to Article 15(3) and (4) of the GDPR, the data subject may request a copy of their personal data processed by NTPS Plc. In this event, NTPS Plc. sends the data subject their personal data processed by NTPS Plc. to the address (e-mail, postal address) specified by the data subject.

3. **Right to rectification.** Pursuant to Article 16 of the GDPR, NTPS Plc. will amend and rectify the data subject’s personal data at their request.

4. **Right to erasure.** In compliance with Article 17 (1) of the GDPR, the data subject may request that NTPS Plc. erase their publicly disclosed personal data if it is processed with their consent (except in the case where a legal mandate exists for disclosing such data).

5. **Right to restriction.** The data subject may request the restriction of data processing in the following cases:

- if the data subject contests the accuracy of their personal data, NTPS Plc. will restrict its processing until it can verify the accuracy of the personal data;
- if the data processing is unlawful, and the data subject opposes the erasure of their personal data and requests the restriction of their use instead;
- if NTPS Plc. no longer needs the personal data, but they are required by the data subject for the establishment, exercise or defence of legal claims.

In the request for the restriction of data processing, the data subject will also need to specify the reason for the request.

NTPS Plc. will honour their request for the restriction of data processing by storing their personal data separately from all other personal data.

6. **Common rules for the exercise of rights.** NTPS Plc. will act upon the request within a month. This deadline may be extended by a maximum of two months.

If the request is denied, NTPS Plc. will inform the data subject, within one month of the receipt of their request, about the reasons for such denial and about their ability to file a complaint with the Authority and to seek judicial remedy.

NTPS Plc. reserves the right to request additional information necessary to verify the identity of the data subject if it has reasonable doubts concerning the identity of the natural person making the request. Such instances include in particular if the data subject makes use of their right to request a copy, in which case it is appropriate for NTPS Plc. to ascertain that the request has been submitted by the authorised person.

#### **V. Enforcement options**

If the data subject believes that NTPS Plc.'s data processing is not in compliance with legal requirements, they may initiate proceedings with the National Authority for Data Protection and Freedom of Information (mailing address: H-1530 Budapest, Pf. 5, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

Furthermore, the data subject has the right to initiate court proceedings regarding the data processing practices of NTPS Plc. They may initiate such proceedings, at their discretion, at the court competent at their place of residence or place of stay.

Place and date: Budapest, 19 June 2018