

**NOTICE ON THE PROCESSING OF PERSONAL DATA**  
**FOR USERS OF THE CUSTOMER SERVICE OFFICES OF NTPS PLC.**

**Dear Customer,**

The purpose of this notice is to provide sufficiently detailed and clear information to all natural persons (“Natural Person”)—acting on behalf of a legal person, organisation without legal personality or natural person, or in his/her own name—making use of the customer service offices of NTPS Plc. with regard to the data processing activity performed by the customer service operated by NTPS Plc. (“Data Controller”).

The data processing activities of NTPS Plc. have been registered by the National Authority for Data Protection and Freedom of Information (“NAIH”) under No. NAIH-91197/2015.

**I. Legal background:**

As a company in 100% public ownership, NTPS Plc. is appointed and authorised by law to perform, on behalf of the Hungarian State, the toll charger, toll enforcement and fine collection<sup>1</sup> functions of the time-based road use system (“TT or e-vignette system”) as well as the toll charger, toll enforcement supporter and bound service provider functions of the distance-based electronic toll system (hereinafter: Toll System)<sup>2</sup>.

In the course of performing this function, NTPS Plc., in accordance with the requirements of Act CLV of 1997 on consumer protection (“Consumer Protection Act”), operates a central customer service to address customer complaints and manage the administration relating to the general road use authorisation (more information on the customer service of NTPS Plc. can be found at: [https://nemzetiutdij.hu/customer\\_services/index](https://nemzetiutdij.hu/customer_services/index)).

In the course of its data processing, NTPS Plc. is required to conform to 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)

**II. Basic terminology:**

**Customer (recipient of this notice):** natural persons contacting the central customer service offices of NTPS Plc. to request information, to conduct road use related procedures or the administration of complaints.

**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

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<sup>1</sup> pursuant to Act I of 1988 on Road Transport and 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

<sup>2</sup> Decree 209/2013 (VI. 18.) of the Government on the implementation of Act LXVII of 2013 on the traveled distance based toll payable for the use of motorways, carriageways and highways

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.

**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.

**Voice recording** means the recording, in a closed, secure, so-called Calgo system used by NTPS Plc., of oral complaints at the central customer service offices or oral communication between NTPS Plc. and the Customer regarding case handling or information relating to road use authorisation.

### III. Scope, legal basis, purpose, duration and mode of data processing:

Description of personal data	Legal basis of data processing	Duration of data processing
registration number (it constitutes personal data only if it can be linked to the Customer provided that the Customer demonstrates that he/she is the owner/operator/user by some other legal title of the motor vehicle with the registration number concerned)	settlement of customer complaints, as well as oral communication with the customer (Consumer Protection Act, Section 17/A (3)), the use of voice recording is justified by the legitimate interest of the Data Controller and the Customer as evidenced by a balance of interests test	5 years (Consumer Protection Act, Section 17/A (7))
Name, address and signature of the customer	settlement of customer complaint (Consumer Protection Act, Section 17/A. (3) and (5)(a) and (e)) the use of voice recording is justified by the legitimate interest of the Data Controller and the Customer as evidenced by a balance of interests test	5 years (Consumer Protection Act, Section 17/A (7))
all other data that can be considered personal data that the customer voluntarily discloses to the NTPS Plc. in the course of complaint administration or personal communication with NTPS Plc. (including by attaching written documents, in particular the vehicle registration certificate, sale and purchase agreements for motor vehicles or other agreements granting the use of motor vehicles)	settlement of customer complaint (Consumer Protection Act, Section 17/A (3) and (5)(c)) the use of voice recording is justified by the legitimate interest of the Data Controller and the Customer as evidenced by a balance of interests test	5 years (Consumer Protection Act, Section 17/A (7))

NTPS Plc. processes these data to comply with consumer protection regulations with regard to the handling of customer complaints and to communication with customers, as well as to implement efficient and customer-friendly administration procedures. Personal Data are recorded by making a

voice recording of personal conversations with customers, based on a balance of interests test to support the legitimate interest of NTPS Plc. and the Customer in voice recording, which test is available at [nemzetiudj.hu/Adatvédelem](http://nemzetiudj.hu/Adatvédelem) or may be obtained before the commencement of the administration procedure from the NTPS Plc. employee providing personal customer service.

**A report is drawn up at the express requests of the Customer.**

**IV. Persons engaged by the Data Controller in the data processing, the Data Processor:**

The staff of the customer service of NTPS Plc. and the senior officials of the customer service function are entitled to perform data processing. No Data Processor takes part in the processing of the data.

Contact details of the Data Controller:

registered office: H-1134 Budapest, Váci út 45/B.

postal address: H-1380 Budapest, Pf. 1170

tel.: +36 1 4368 000

e-mail: [ugyfel@nemzetiudj.hu](mailto:ugyfel@nemzetiudj.hu)

Contact details of the data protection officer of the Data Controller:

[dpo@nemzetiudj.hu](mailto:dpo@nemzetiudj.hu),

tel.: +36 1 4368 000

Additional information concerning the data protection officer can be found at [www.nemzetiudj.hu/Adatvédelem](http://www.nemzetiudj.hu/Adatvédelem) or requested in person from our customer service officers.

**V. As a Customer, you have the following rights regarding data processing:**

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

- your personal data processed;
- the purpose of processing;
- the duration of data processing;
- your rights regarding data processing;
- the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information ('Data Protection Authority').

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

If a voice recording is made, NTPS Plc. provides you access, at your request, to listen to the voice recording, at a prearranged time, at its customer service office free of charge within 30 days, and provides a copy of the voice recording once per recording. If your request, NTPS Plc. makes available the copy of the voice recording electronically. You may exercise these rights in combination or separately. The only condition for the release of the voice recording is your identification by NTPS Plc.

In case a record was taken of the handling of a complaint, our employee gives you a copy of such record.

3. **Right to rectification.** Pursuant to Article 16 of the GDPR, we modify or clarify your personal data in accordance with your request.

4. **Right to erasure.** You may request the erasure of your personal data if the object of processing as defined in this notice has been achieved or if the data processing was unlawful.

5. **Right to restriction.** You may request the restriction of processing in the following cases:

- if you contest the accuracy of personal data, we restrict their processing until NTPS Plc. verifies the accuracy of such personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- NTPS Plc. no longer needs the personal data, but they are required by you for the establishment, exercise or defence of legal claims;

In the request for the restriction of data processing you also need to specify the reason for such request. NTPS Plc. honours your request for the restriction of processing by storing personal data separately from all other personal data. For instance, sets of electronic data are saved to external media, while paper-based files are stored in separate folders.

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

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

NTPS Plc. reserves the right, in the event it has reasonable doubts concerning the identity of the natural person making the request, to request the provision of additional information necessary to confirm the identity of the data subject. Such instances include in particular if the data subject makes use of his right to request a copy, in which case it is appropriate for NTPS Plc. to ascertain that the request originates from the data subject.

## **VI. Enforcement options**

If you consider that the data processing by NTPS Plc. has not complied with legislative requirements, you may initiate a proceeding with the Data Protection Authority (postal address: H-1530 Budapest, Pf. 5., e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

Furthermore, you have the right to initiate court proceedings regarding the data processing practices of NTPS Plc. You may initiate such proceedings, at your discretion, at the court competent at your place of residence or place of stay.

Place and date: Budapest, 23 May 2018