



NOTICE ON THE PROCESSING OF PERSONAL DATA

Dear Road User,

On 10 September 2019, a cooperation agreement was made between ROATEX Ltd. (hereinafter: "the Controller") and National Toll Payment Services Private Company Limited by Shares (hereinafter: "NTPS Plc.") for the preparation and implementation tasks associated with developing a project for the cashless toll payment system by using the Indonesian Multi-Lane Free Flow (MLFF) solution.

The preparatory works of the project require the examination of how the capabilities of different data collection devices function in practice (i.e. in real environment), to compare their efficiency and to select the most optimal device.

In order to achieve the above purposes, the Controller wishes to carry out the processing activities detailed in the present Notice for an approximately 2-month period at the location indicated herein.

The purpose of processing is to generate statistical data and draw conclusions as to the capabilities of certain data collection devices.

Given that the Controller's processing activities involve the use of registration numbers and related data (such as country code, vehicle category, number of axles), which, under certain circumstances, may be associated with natural persons and, as such, may qualify as personal data, the publication of a Notice for relevant road users is deemed necessary by the Controller.

However, the Controller declares that it is not authorised by law to request any data from the vehicle register within the road transport records to identify the data of the owner/operator of the vehicle; therefore, the given vehicle and the identity of the relevant owner/operator will not be combined. Consequently, the Controller **does not have access to personal data** in respect of the vehicles during the processing period.

Examination of the functioning of the devices in real environment will be carried out as follows:

The processing involves the examination of the capabilities of the relevant data collection devices in their real operating environment.

Findings of the comparison of the data recorded by the Controller, together with the data recorded by NTPS Plc. and made available to the Controller will serve as the basis for examining the capabilities. Based on the results of such comparisons, the Controller will generate statistical data to present and analyse the capabilities of the examined devices.

NTPS Plc. is authorised under law to carry out, among other things, toll enforcement activities on toll public road sections, the toll charger and enforcement support tasks for vehicles with a maximum authorised total mass exceeding 3.5 tonnes; and it is entitled to make recordings of such vehicles on toll sections within the framework of the foregoing.

Data recorded by the data collection devices are stored on a device provided by the Controller, and are not disclosed to third parties.

Data recorded by the Controller will be processed for the sole purpose of measuring against the surveillance data collected by NTPS Plc. and made available to the Controller; such data will be erased once the comparison is complete.



The data are compared using the following data:

- date of unauthorised road use (transit);
- following data of the detected vehicle:
 - o registration number,
 - o country code,
 - o number of axles,
 - o vehicle category

Following comparison of the data recorded by the Controller and NTPS Plc., in the course of investigating the cause of any discrepancies, the Controller may access images recorded of any events affected by such discrepancies. **The Controller points out that recorded images alone are not suitable for identifying the personal data of natural persons who may be associated with the vehicle at the time of recording.**

The data made available to the Controller for the purposes of investigating any discrepancies will not be handed over to the Controller; employees of the Controller participating in the evaluation are authorised to record the findings of such evaluation (i.e. the detected cause of a discrepancy).

Location of data recording:

- M0 70+575 J – VMS (Variable Message Sign) portal

Data to be recorded:

- vehicle country code;
- vehicle registration number;
- vehicle category;
- number of axles

Data comparison will take place within 72 hours of the availability of all relevant data.

If there is a match, the image data and the data of the vehicle's registration number will be deleted immediately after comparison.

If there is a no-match (i.e. discrepancy), such discrepancy will be investigated within 7 working days. In this case, the recorded image data, together with the registration number data of the vehicle will be deleted on the working day following such investigation.

The Controller shall comply with the provisions of Act CXII of 2011 on the right to informational self-determination and on the freedom of information ("the Privacy Act") and the GDPR (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 ("the General Data Protection Regulation")), as well as the provisions of the relevant sectoral and other civil law regulators.

No person other than the staff members (employees/agents) employed by the Controller in a legal relationship for work and designated for this task will participate in the processing.

The legal basis for processing is the legitimate interest defined in Article 6(1)(f) of the GDPR, demonstrated by the Controller with a legitimate interests assessment.



Rights of data subjects (i.e. the operators of vehicles with registration numbers shown on the recordings captured by the Controller) related to processing:

1. Right to information.

Pursuant to Article 15(1) of the GDPR and Section 16 of the Privacy Act.

2. Right to request a copy.

Pursuant to Articles 15(3) and 15(4) of the GDPR and Section 17 of the Privacy Act, a copy of personal data processed by the Controller may be requested.

3. Right to rectification of personal data.

Pursuant to Article 16 of the GDPR and Section 18 of the Privacy Act, the modification or clarification of personal data may be requested.

4. Right to restriction of processing.

Data subjects may request the restriction of processing in accordance with Article 18 of the GDPR.

5. Right to object.

In accordance with Article 21 of the GDPR, data subjects have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them. In this case, the Controller shall no longer process personal data.

6. Common rules for the exercise of rights.

Personal data will be stored only until the statistical data required for the purpose are generated, but for a maximum of 30 days, and exercising the above rights is possible only during this period of time. *(If there is a match, the image data and the data of the vehicle's registration number will be deleted immediately after comparison. If there is a no-match, such discrepancy will be investigated within 7 working days. In this case, the recorded image data, together with the registration number data of the vehicle will be deleted on the working day following such investigation.*

If a data subject believes that the processing violates legal requirements, he or she may initiate proceedings with the National Authority for Data Protection and Freedom of Information (mailing address: H-1363 Budapest, Pf. 9, e-mail: ugyfelszolgalat@naih.hu). Any person may initiate proceedings on grounds of a suspected occurrence or imminent danger of a violation in the processing of personal data by filing a report.

In such report, data subjects should present evidence that they have attempted to enforce their rights with the Controller.

Furthermore, the data subject has the right to seek judicial remedy as well. Such proceedings, at the data subjects' option, may be initiated at the regional court having jurisdiction at their place of residence or place of stay.

Please note that information about the processing carried out by NTPS Plc. in relation to the activities pursued under the cooperation agreement between the Controller and NTPS Plc. is made available by NTPS Plc. on its own website (www.toll-charge.hu) in the form of a Privacy Policy.

Date: 7 December 2020

Roatex Ltd.