

## NOTICE ON THE PROCESSING OF PERSONAL DATA FOR USERS OF THE CUSTOMER SERVICE OFFICES OF NTPS PLC. LOCATED AT H-1075 BUDAPEST, RUMBACH SEBESTYÉN U. 19-21

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 office of NTPS Plc. located at H-1075 Budapest, Rumbach Sebestyén u. 19-21 with regard to the data processing activity performed by the customer service operated by NTPS Plc. ("Data Controller").

### 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<sup>2</sup> functions of the distance-based electronic toll system (hereinafter: "the Toll System").

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 authorization (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 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.

<sup>1</sup> | pursuant to Act I of 1988 on road transport and Decree No. 45/2020. (XI. 28.) of the Minister for Innovation and Technology on motorways, expressways and main roads subject to toll payment and on the tolls payable ("Toll Decree")

<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

Camera surveillance means recordings captured (without live images or sound) by surveillance cameras installed for anti-theft and security reasons in the customer area of customer service offices, suitable for identifying natural persons whose image was captured based in such image. Detailed information about camera surveillance is attached hereto as an annex and shall form an integral part hereof.

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

Description of personal data	Legal basis for data processing	Duration of data processing
registration number	the handling of customer complaints and fines, oral communication with customers and the provision of services as per the Toll Decree (Section 17/A(3) of the Consumer Protection Act; fine maximum as per Sections 14 and 15 of the Toll Decree, payment of fines by purchasing an annual vignette (Section 16) and other services the Controller may provide to customers pursuant to Sections 18 and 19 of the Toll Decree)	5 years (Consumer Protection Act, Section 17/A(7), and the prescription period applicable to the enforcement of civil claims in general, pursuant to Section 6:22 of the Hungarian Civil Code)
Name, address and signature of the customer	the handling of customer complaints and fines, the provision of services as per the Toll Decree (Section 17/A(3) and (5)(a) and (e) of the Consumer Protection Act; fine maximum as per Sections 14 and 15 of the Toll Decree, payment of fines by purchasing an annual vignette (Section 16) and other services the Controller may provide to customers pursuant to Sections 18 and 19 of the Toll Decree)	5 years (Consumer Protection Act, Section 17/A(7), and the prescription period applicable to the enforcement of civil claims in general, pursuant to Section 6:22 of the Hungarian Civil Code)
The image of the customer	protection of persons and property in the controller's areas open to the public for customer service (legitimate interest according to GDPR Article 6 (1) point f) and the interest pursuant to Section 5 (1) point c) of Act CXII of 2011 on Informational self-determination and freedom of information (the "Privacy Act") (protection of the vital interests of the data subject or of another person, or the elimination or the prevention of a direct threat to the life, physical integrity or property of persons), supported by a Legitimate Interests Assessment, which is available at <a href="http://toll-charge.hu/Privacy">toll-charge.hu/Privacy</a> policy or in hard copy at the customer service offices of NTPS Plc	15 working days, except where the data subject requests blocking of the recording

<p>all other data that can be construed as personal data that the customer voluntarily discloses to the NTPS Plc. in the course of a complaint administration or personal communication with NTPS Plc.</p>	<p>the handling of customer complaints and fines, the provision of services as per the Toll Decree and oral communication with customers (Section 17/A(3) and (5)(c) of the Consumer Protection Act; fine maximization as per Sections 14 and 15 of the Toll Decree, payment of fines by purchasing an annual vignette (Section 16) and other services the Controller may provide to customers pursuant to Sections 18 and 19 of the Toll Decree)</p>	<p>5 years (Consumer Protection Act, Section 17/A(7), and the prescription period applicable to the enforcement of civil claims in general, pursuant to Section 6:22 of the Hungarian Civil Code)</p>
--	---	---

NTPS Plc. processes these data—with the exception of customers' images—to comply with consumer protection regulations and the Toll Decree with regard to the handling of customer complaints and to communication with customers, as well as to implement efficient and customer-friendly administration procedures.

Please be informed that no voice recording is available at this customer service office.

A protocol will be prepared of the administration procedure.

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

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: 1134 Budapest, Váci út 45. Building B | postal address: H-1380 Budapest, Pf. 1170

tel.: +36 1 4368 000 | e-mail: [ugyfel@nemzetiudij.hu](mailto:ugyfel@nemzetiudij.hu)

Contact details for the Data Controller's data protection officer:

[dpo@nemzetiudij.hu](mailto:dpo@nemzetiudij.hu)

Additional information concerning the data protection officer can be found at <https://toll-charge.hu/articles/article/privacy-policy-1> 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 and Section 14 of the Privacy Act, you 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 you:

- your personal data processed;
- the purpose of data 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 obtain a copy.** Pursuant to Article 15(3) and (4) of the GDPR and Section 14 of the Privacy Act, 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.

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

With regard to the image of the customer, in respect of the recording of the camera installed in the customer area, the data subject may request blocking (restriction) of the recordings, it is sufficient to invoke the customer's legitimate interest and there is no need to prove it. Turning to the authority is not the data subject's only legitimate interest. The blocked recording may be stored beyond 30 days. If the data subject also requests a copy of the recording, he or she need not provide a reason therefor.

**3. Right to rectification.** Pursuant to Article 16 of the GDPR and Section 14 of the Privacy Act, 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 data processing in the following cases:

- if you contest the accuracy of the personal data, we will restrict their processing until NTPS Plc. verifies their accuracy;
- the data 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 your legal interests; or

In your request for the restriction of data processing, you will also need to specify the reason for the request. NTPS Plc. will honour your request for the restriction of data processing by storing your personal data separately from all other personal data. For instance, if stored electronically, they will be saved to external media, while paper-based files will be stored in separate folders.

**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 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 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.

## **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- 1363 Budapest, Pf. 9., 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, 21 October 2021

**National Toll Payment Services Plc.**