

Privacy Policy

DEAR VISITOR,

The protection of your personal data is of primary importance for FGSZ Zrt.

We are fully aware of the fact that you hold the right of disposal over your personal data, and therefore we will, to the best of our ability, ensure the careful and safe processing and storage of data provided to us.

In the course of our operation, we strive to restrict the scope of data collected as much as possible, always subjected to your consent and by informing you. All data are used exclusively for pre-defined purposes, and they are not disclosed to third parties without your consent.

Thank you for your continued interest and support.

Privacy Policy FGSZ Földgázszállító Zártkörűen Működő Részvénytársaság FGSZ Natural Gas Transmission Private Company Limited by Shares

registered at H-8600 Siófok, Tanácsház u. 5

Last revision: 2023.

Table of contents:

- 1. General provisions and contact information
- 2. Updates and accessibility of the Policy
- 3. Understanding and acceptance of the Policy
- 4. Scope of the data processed and the purpose of processing
- 5. Decision based on automated data processing
- 6. Persons authorised to process data (editor, admin)

7. Data transfers

8. Sending direct mails

9. Cookies and web beacons, anonymous information collected during the use of our websites

10. Processing of data of authorised visitors (entry, camera system)

<u>11. Data processing relating to the possibility of establishing employment, retention of applications, curricula vitae</u>

12. Data processing activities relating to procurement procedures

- 13. Audio and video recording of meetings (held online and/or in person)
- 14. Personal data relating to children and third persons
- 15. Data security measures

<u> 16. Links</u>

17. Rights and legal remedies of the data subjects in the course of registration, job application and other

voluntary contacting

18. Public communication options and other matters



1. General provisions and contact information

This Privacy Policy ("**Policy**") is the privacy policy of **FGSZ Földgázszállító Zártkörűen Működő Részvénytársaság** (registered office: H-8600 Siófok, Tanácsház u. 5.; hereinafter: "FGSZ" or "Company") that applies to your personal data collected and processed by FGSZ.

Address of FGSZ Zrt.: FGSZ Földgázszállító Zrt. **H-**8600 Siófok, Tanácsház u. 5.

FGSZ is registered by: Company Registry Court of the Kaposvár Regional Court

Company registration number: 14-10-300230

VAT number: 12543331-2-14

If you have any questions or comments regarding this Policy, prior to using the website <u>https://www.fgsz.hu</u>, or providing any information as described in this Policy, please contact our Customer Services at any of the following contacts:

Contact information of FGSZ Zrt.: please use the contact options displayed at the bottom of the website <u>https://www.fgsz.hu</u>.

2. Updates and accessibility of the Policy

FGSZ reserves the right to modify or amend this Policy at its own discretion, with effect from the date of such modification or amendment. In view of the foregoing, it is recommended to regularly visit <u>https://www.fgsz.hu/</u> in order to keep track of the changes.

We send you the Policy in effect from time to time electronically upon your request.

3. <u>Understanding and acceptance of the Policy</u>

By providing any personal data or information, you represent to have understood and expressly accepted the version of this Policy in effect on the date of provision of such data or information.

When using certain individual services, specific data protection conditions may also apply; you will be notified of such conditions prior to using the service.

4. <u>Scope of the data processed and the purpose of processing</u>

When using certain websites (rbp.eu, fgsz.hu) or in connection with specific services (RBP, OTR, IPDATA), you may be requested to provide personal data, and during your communication with FGSZ you may voluntarily disclose data (curriculum vitae) or make certain data publicly accessible (e.g. on social media sites). Pursuant to Section 3(2) of Act CXII of 2011 on the Right of Informational Self-determination and on Freedom of Information ("Info Act") and the provisions of the General Data Protection Regulation ("GDPR") adopted under no. 2016/679/EU, some of the information we collect qualify as "personal data".

The scope of the data processed, the purpose of processing, the duration of processing and the scope of persons with the right of access are shown in the following table.

FGSZ basically processes the following personal data:

- For the purpose of operating a complaint reporting platform registration of phone number and e-mail communication.
- For the purpose of conducting customer satisfaction surveys registration of e-mail communication in the form of newsletters.



- Data processing in relation to contracts: processing of data that are necessary for the performance of a contract or in order to take steps at the request of the data subject prior to the conclusion of a contract (personal data provided by the tenderers in the tendering process, the contact persons' personal data to be included in contracts).
- By operating closed-circuit image recording camera systems, FGSZ records the image of individuals entering the monitored area, their vehicles' plate numbers and their behaviour, for a period enabled by law. No audio recording is performed.
- **By operating electronic entry control systems**, FGSZ records and retains the name of individuals entering, for individuals that hold a permanent authorisation to enter, their photo, company name, purpose of entry, card number and data on their movement in the area, for a period enabled by law.
- For keeping record of health, safety and work protection exams: the name, place of birth, nationality and company name of examinees are retained for 5 years from the termination of contract.
- 5. <u>Decision based on automated data processing</u>

Registration confirmation mails are part of automated data processing; such mails are generated with the use of non-personal data provided by the customer, and sent to the customer by the system used by FGSZ, in line with the relevant pre-specified rules. Our Newsletter and customer satisfaction surveys relating to the services are based on this method. Similarly, when a complaint form is filled and submitted, our system sends an automatic confirmation to confirm the receipt of complaint. This is a standard format mail showing the data of the customer and the registered product; it is sent by FGSZ's Customer Relationship Management (CRM) system.

6. Persons authorised to process data (editor, admin)

For the purpose of performing the technical tasks relating to data processing operations, FGSZ employs the processors listed in the table below. The rights and obligations of processors relating to the processing of personal data are provided by FGSZ as controller in the context of the Info Act, GDPR as well as specific acts pertaining to data processing. As controller, FGSZ shall be liable for the legality of its instructions given. The processor may not make any substantial decision in relation to data processing, and may process any personal data it learns in line with the instructions of FGSZ as controller; it may not perform data processing for its own purposes, and is obliged to store and retain personal data as required by FGSZ as controller.

Purpose of data processing	Forum	Site	Processor	Types of personal data	Retention period
Communication with customers Customer satisfaction survey	Newsletter	fgsz.hu; social media sites	HR	e-mail address, name	Until unsubscribed
Introducing the Company to young people	Contest, Newsletter	fgsz.hu	HR	e-mail address, name	Until unsubscribed
Record-keeping of customer information	RBP customers	rbp.eu	Sales and Customer Support	e-mail address, name	Until erasure requested
Record-keeping of data of contracted partners	Contracted Partners	fgsz.hu	Procureme nt, IT	Name, address, e-mail address, phone number	For 5 years from the termination of the contract
Remote support	Contracted Partners	vpn1.fgsz.hu	IT	e-mail address, password	For 5 years from the termination of the contract



Recruitment	Visitors of	linkedin.com	HR	curriculum vitae	Until erasure
	the website				requested
Communication with customers	Contracted partners, persons performing work.	e-learning: ebkelarning.f gsz.hu	TBEM	Name, address, e-mail address, date of birth, phone number	For 5 years from the termination of the contract
Property protection control of individuals entered	Contracted Partners	FGSZ Zrt. Company Security camera centre	TBEM	Entry control and camera system data	24 hours, 3 days, 30 days, 60 days.

7. Data transfers

Data provided in connection with the performance of financial services and the execution of financial transactions on the internet will be transferred to OTP Bank Nyrt. and ING Kereskedelmi Bank Magyarország through the bank card acceptance network of OTP Bank Nyrt. and ING Kereskedelmi Bank Magyarország for the purpose of executing the financial transactions.

8. <u>Sending direct mails</u>

You can unsubscribe from our direct mails at any time without any limitation or reason, free of charge, by using the following communication channels:

<u>https://fgsz.hu/vallalatunk/hirek/archiv-hirlevelek</u>or via any of the following contacts: FGSZ Zrt. +36 (84) 505-117, Customer Service: <u>info@fgsz.hu</u>. Furthermore, if you receive any direct mail from us, you will be reminded of the possibility to unsubscribe at any time, without any limitation or reason, free of charge.

9. <u>Cookies and web beacons, anonymous information collected during the use of our websites</u>

Cookies are used on the fgsz.hu website. Cookies are files that store information on your hard drive or in your web browser. Cookies enable the website to recognise you if you visited the site earlier. Cookies help us understand which parts of the website are the most popular, as they show the pages viewed by our visitors and the time they spend there. By studying the results, we can adjust the website to better serve your needs, and therefore provide you with a more diverse user experience. For example, with the use of cookies we can ensure that the next time you visit our website the displayed information will meet your expectations as user.

When you visit one of our websites, such technical information may be automatically collected which will not personally identify you. Such information may include the name of another website that has directed you to the given website, the location from where the website has been accessed or the searches performed at the website. The collection of such information assists us in recognising the preferred search habits of the users at our website without the use of personal data. This information is solely used internally. Anonymous or generic data from which you cannot be identified is not considered as personal data, meaning this Policy is not applicable to it.

When you first visit the fgsz.hu website, the cookie management window pops up. This contains a detailed cookie information and options to either accept or reject cookies. To enjoy a properly functioning website, the cookies need to be stored, and any other cookies aimed at ensuring user



experience are used only with the explicit consent given by the visitor of the website. The visitor of the website can change these settings later at any time, or can even withdraw their consent at the page https://fgsz.hu/adatvedelem.

If any change occurs in cookie management, the visitor of the website is asked to re-set which cookies they give consent to be used beyond the necessary ones when visiting the website for the first time after such change.

You can set your web browser to accept all cookies, reject all cookies or notify you when a cookie is pushed to your computer. Each web browser is different, so please use the "Help" menu in your browser to change the cookie settings. For example in the Microsoft Internet Explorer, go to "Tools/Internet Options" to turn off cookies and change the security settings. The <u>https://fgsz.hu</u> website has been designed to operate with the use of cookies, and for this reason disabling cookies may affect the usability of the website and prevent you from enjoying all benefits.

Cookies used at the websites:

- Analytics, tracking
- User ID, session cookie

We do not exchange cookies with third parties or with websites operated by third parties.

The <u>https://fgsz.hu/</u> website and any communication resulting from the use of and/or registration at the website, such as promotional emails, may contain electronic images called web beacons. Web beacons operate similarly to cookies, and can be used e.g. for the following:

- counting the number of website visitors;
- monitoring your activities in connection with any e-mail, or if you clicked on a link to for instance – the terms and conditions of participating in a contest;
- o implying how successful a specific marketing campaign or contest was;
- serving as a basis for generating interest in individual parts of the website according to specific criteria;
- o determining the success of advertisements and contests in terms of sales; or
- helping to determine the popularity of a product or service, and how such interest is divided between FGSZ products and services.

10. Processing of data of authorised visitors

Only authorised persons are allowed to enter FGSZ premises. FGSZ reserves the right to determine the scope of persons entering its premises. FGSZ keeps record of the guests entering its premises electronically, and provides the guests with visitor cards.

FGSZ operates an entry control system and camera system for property protection purpose covering the entire area of the office buildings and plants of FGSZ Zrt. In order to enter, the person concerned is required to show a photo ID document that proves their identity and consent to the electronic storage of certain data.

Purpose of data processing: FGSZ as controller operates an electronic entry control and camera system in order to account for the exact number of employees and other persons in its premises, for the purpose of preventing accidents and protecting human life and physical integrity; as well as to prevent, detect and provide evidence of any infringements or property crimes and investigate the circumstances of any possible workplace accidents.



Legal grounds for data processing: for external persons/guests, the voluntary consent of the data subject is deemed to be given by entering the site of FGSZ; fulfilment of contractual obligations; as well as the provisions of Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators and Act I of 2012 on the Labour Code.

Scope of the data processed: For every person entering the premises of FGSZ, name, for individuals that hold a permanent authorisation to enter, photo, company name, card number, place and date and time of entry and leaving, face image as recorded by the camera system as well as any other conclusions that can be learned from the recordings recorded by the surveillance system.

Duration of data processing: The personal data of the data subject used for operating the <u>entry control</u> <u>system</u> is processed for 6 months for those entering regularly. Otherwise, the Company destroys the personal data immediately upon the cessation of the authorisation to enter, while for those entering occasionally, after <u>24 hours</u> from the time of leaving. Pursuant to Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators and Section 9/A of Act CLIX of 1997 on Armed Security Guard, Nature Conservation and Field Guard Service, the Company destroys the personal data recorded by the <u>camera surveillance system</u> after <u>3 days as a general rule, but no later than within 30 or 60 days in specific cases as provided by law</u>.

By entering after learning the content of the information brochure for visitors, the person voluntarily, expressly and unambiguously consents to the processing of their personal data. The Privacy Policy is available at the Company's office reception desk at <u>www.fgsz.hu</u>.

11. <u>Data processing relating to the possibility of establishing employment, retention of applications,</u> <u>curricula vitae</u>

In the case of CVs and applications, the purpose of the data processing is to fill advertised vacant positions. Accordingly, in case FGSZ, as employer, selects one person from the applicants for the advertised position, the purpose of data processing is terminated, and the personal data of non-selected candidates must be erased.

At the same time, the Company is legally bound to erase the data in case the data subjects change their mind and withdraw their applications during the application process.

FGSZ may only retain application documents based on the express, unambiguously and voluntary consent of the data subject. When data subjects submit their application documents to FGSZ, it does not automatically imply a consent to the retention of the application documents after the termination of the original data processing purpose (establishment of employment relationship). Therefore, the established practice is that after the completion of the recruitment process, FGSZ requests the applicants to give their consent to the further processing of their data.

To ensure the applicants' right of informational self-determination at the highest level, FGSZ informs them even if they were not selected for the given positions.

Personal data includes conclusions drawn from the data relating to the data subject. Accordingly, in case an employee of FGSZ makes any record of the applicant, such record is also considered to be the applicant's personal data. On the one hand, the data subject's right to information covers the above situation, i.e., the applicant has the right to learn the conclusions drawn by the recruiting entity in connection with their application. On the other hand, it is also necessary to erase the records of such nature, including the conclusions reached on the data subject if the original purpose of data processing no longer prevails (i.e. the applicant did not establish an employment relationship with FGSZ Zrt.).



Processing of applicants' personal data in the scope of curriculum vitae and applications submitted to the Company by e-mail or via the Company's Career Portal and recruitment rules

Purpose of data processing: the Company gives the opportunity for the prospective employees that learn current job vacancies to submit their applications to the Company's HR department by e-mail or via the Company's Career Portal. The purpose of data processing is to optimise the number of employees through the employment of skilled workers with appropriate competences. In addition, for the purpose of establishing an employment relationship, job applicants can submit their curricula vitae with their personal information and data relating to their job applications to the e-mail address indicated at the Company's website. By submitting their curricula vitae, applicants give their voluntary consent to the recording of their data in accordance with this Policy, for the purpose of establishing an employment relationship.

Legal grounds for data processing: Voluntary consent of the data subject in accordance with the provisions of the GDPR and Section 5 of Act CXII of 2011 on the Right of Informational Self-determination and on Freedom of Information.

Scope of the data processed: Name; address; educational qualifications; personal data included in the curriculum vitae or in the documents attached to the application.

Duration of data processing: Until the applicant's voluntary consent is withdrawn, but no more than 3 months from the date of receipt of the application, unless the applicant subsequently and voluntarily gives their consent to FGSZ Zrt. in relation to the continued processing and storage of their personal data in order to contact the applicant directly in the event of any new employment opportunity. In this case, the data processing will continue until the voluntary consent to further data processing is withdrawn, or up to 2 years after the receipt of the CV. Applicants may withdraw their consent to storing their CV at any time, by contacting FGSZ at the contact details provided in the Company's Privacy Policy and Data Protection Policy.

12. Data processing activities relating to procurement procedures

In its procurement procedures, our Company requests data, in some cases curriculum vitae, official qualification documents or declarations from the tenderers in order to check the authenticity of data provided in the tender, prepare the contract based on the winning tender, initiate communication with the contact person appointed in connection the given tender about the contracting procedure, seek preliminary information from the appointed contact person about their willingness to submit a tender in similar procurement procedures in the future, as well as to learn the possible solutions the tenderers can deliver to other procurement needs.

Purpose of data processing: The purpose of data processing is to check the conformity of the tender with the conditions provided in the call for tenders, to prepare the contract, and to ensure the possibility of contacting in the event of clarification or reconciliation needs or in the course of preparing further procurements.

Legal grounds for data processing: Voluntary consent of the data subject in accordance with the provisions of the GDPR and Section 5 of Act CXII of 2011 on the Right of Informational Self-determination and on Freedom of Information.

Scope of the data processed: Personal data of contact persons appointed in the contract (name, address, e-mail address, phone number), curriculum vitae and official qualification documents submitted in the tendering process, or personal data included in any other attached documents.



Duration of data processing: The documents submitted in the tendering process and the data of contact persons appointed in the contract must be retained for a minimum of 5 years from the termination of the contract. However, the retention period stipulated for Archive documents listed in Annex 8 of the policy titled "Management of VIG-5 documents" must also be considered, which may require a retention period of more than 5 years in certain cases.

13. <u>Audio and video recording of meetings (held online and/or in person)</u>

Purpose of data processing: During work, the Company can hold personal and/or online meetings, where the Company is entitled to make video or audio recordings in order to make it possible to watch or listen to them later, document work processes more accurately and perform work more effectively and quickly. Such recordings may contain the image or voice of participants, and their remarks may be recorded. The organiser of the meeting is required to inform the invitees about the possibility of recording in advance, both in the invitation sent and in person. External invitees may also attend such meetings beyond the employees. The Company represents that the recordings made at the meetings do not violate the employees' and other attendees' personal rights related to the protection of good reputation, honour and human dignity, and the recordings solely serve the purpose of recalling what was said and what events happened in the meeting.

Legal grounds for data processing: Voluntary consent in accordance with Article 6(1)(a) of the GDPR.

Scope of the data processed: Image and voice appearing in photo, video or audio recordings.

Duration of data processing: Duration of the meeting subject to recording, or until the purpose of the meeting is fulfilled, but no more than 1 year.

14. Personal data relating to children and third persons

Persons under the age of 16 may not provide their personal data unless it is approved by their parents. By making your personal data available, you represent and warrant to act in proper observance of the foregoing, and that your capacity in relation to the disclosure of information is not restricted.

In case you are not legally entitled to disclose any personal data independently, you are required to obtain the consent of the third person data subjects (e.g. authorised family member, guardian, custodian or any other person, such as a customer, on whose behalf you act) or ensure other legal grounds for the provision of data. In this context, you are required to consider whether the consent of a third person is necessary in connection with the disclosure of the personal data in question. There may be situations where FGSZ does not come in personal contact with you, thus you are required to ensure compliance with the requirement herein, while FGSZ may not be held liable in this respect. Nevertheless, FGSZ shall at all times be entitled to check the existence of proper legal grounds for processing any personal data. For instance, if you are acting on behalf of a third person – e.g. a family member –, we are entitled to seek your authorisation and/or the appropriate consent of the data subject to data processing in the given matter.

We will make all reasonable efforts to erase all the information unduly disclosed to us, and ensure that such information is not transferred to other parties or used by us, either (for use in advertising or for any other purpose). Please let us know immediately if you have learnt that children provided personal data about themselves, or in case a third person disclosed personal data about you. You may contact us at any of the contacts provided at the beginning of this Policy.

15. Data security measures



The security of your information is protected by the following means:

- encryption of the passwords provided by the user;
- o communication via encrypted TLS/SSL channel; and
- restriction of access to information (for example, only those of our employees may have access to information that need it to fulfil the purposes above).

You are kindly requested to help us in protecting information by avoiding the use of any obvious login name or password and regularly changing your password; furthermore, please do not make your password available to others.

Records of communications with the call centre may exclusively be accessed by those appointed and dedicated employees that signed separate confidentiality declarations.

16. <u>Links</u>

The <u>https://fgsz.hu/</u> website may contain links to other websites not controlled by us, and websites not controlled by us may also offer links to our <u>https://fgsz.hu/</u> website. When you leave the <u>https://fgsz.hu/</u> website, we may not assume responsibility for the security of any information you disclose at other websites. It is recommended to act with caution and learn the confidentiality documents of such websites thoroughly.

17. <u>Rights and legal remedies of the data subjects in the course of registration, job application and other</u> voluntary contacting

In general, the data subject may request from the controller (a) information on the processing of the data subject's personal data, (b) the rectification of personal data, and (c) the erasure or blocking of personal data unless statutory data processing is performed. Upon the data subject's request, the controller shall provide <u>information</u> after the submission of the request as soon as possible, but no later than within 15 days in writing, in an intelligible form.

If the controller fails to fulfil the data subject's request for rectification, blocking or erasure, it shall notify the data subject regarding the factual and legal reasons of rejecting the request for rectification or erasure within 25 days after receipt of the request in writing or – if the data subject consents thereto – by electronic means.

The legal grounds for data processing is the voluntary consent of the users, which is deemed to be given by opening the website or entering certain parts thereof subject to registration.

a.) Right to information

Users may request information about the processing of their personal data. Upon the data subject's request, the controller shall provide information in relation to the data processed by the controller in association with the data subject, the purpose of data processing, its legal grounds and duration, the name, address of the processor and its activities associated with data processing, as well as who received or receives the data and for what purposes. Such information may be requested at the controller's postal address (registered office: H-8600 Siófok, Tanácsház u. 5) or the info@fgsz.hu e-mail address.

The same contacts can be used to initiate the rectification or erasure of the user's personal data.



Any user that believes that the controller has violated their right to the protection of personal data may enforce their claim before a civil court, or seek assistance from the National Authority for Data Protection and Freedom of Information (hereinafter: "Authority"). Detailed provisions pertaining to the foregoing and the controller's obligations are set out in the Info Act.

b.) Right to rectification, erasure

If the personal data is incorrect and the correct personal data is available to the controller, the controller shall rectify the personal data. Personal data shall be erased if the data processing is unlawful; if so requested by the data subject as specified above; if the data is incomplete or inaccurate – and such conditions may not be legally remedied – provided that such erasure is not excluded by law; if the purpose of data processing no longer exists, or if the period for data storage specified by law expires; if ordered by any court or the Authority.

The data subject and anyone to whom the data was previously transferred for the purpose of processing shall be notified regarding the rectification and erasure. Notification may be omitted if this does not harm the legitimate interests of the data subject with regard to the purpose of the processing.

In the event of an inappropriate use of the services offered by the website, or if so requested by the user, the controller shall erase the data of the data subject. Data is erased within 8 days following the receipt of the demand for erasure. The controller shall annually notify the Authority of any rejected requests until 31 January of the year following the year of the request. If the controller rejects the request for rectification or erasure, it shall inform the data subject regarding the option of legal remedy or proceeding to the Authority.

c.) Right to object

The data subject shall have the right to object to the processing of personal data if the processing or transfer of personal data is required exclusively for fulfilling the legal obligations of the controller or the enforcement of the legitimate interest of the controller, the data recipient or a third person, except in the case of statutory processing, when personal data are used or transferred for the purpose of direct marketing, public opinion poll or scientific research; and in other cases specified by law.

The data subject shall have the right to object to the processing of their personal data in the cases specified in Section 21 of the Info Act. The controller shall investigate the objection, make a decision regarding whether it is justified and inform the applicant regarding such decision within the shortest time possible, but at the latest within 25 days after the submission of the objection.

If the controller finds that the data subject's objection is justified, the controller shall discontinue the data processing, including any further data recording and data transfer, and shall block the data and shall communicate the objection and actions taken on its basis to all parties to whom it has previously transferred the personal data to which the objection refers, who are obliged to take action in order to enforce the right to object. If the data subject disagrees with the decision made by the controller, or the controller fails to meet the respective deadline, the data subject shall have the right to proceed to court within 30 days following the communication of the decision or the deadline.

In case the rights of the data subject are breached or in cases listed in Section 21 of the Info Act, the data subject shall have the right to proceed to court. At the data subject's discretion, the court proceedings may also be initiated at the regional court at the address or place of residence of the data subject.

The court shall act in extraordinary proceedings in these cases. The controller shall be liable for any damage caused to a data subject as a result of an unlawful processing or by any breach of data security



requirements, The controller shall be liable for damage caused to the data subject by the processor, as well. The controller shall be exempted from its liability if it can prove that the damage has resulted from any uncontrollable cause beyond the scope of data processing. The damage need not be indemnified in case it has a result of deliberate or gross negligence by the damaged party.

Furthermore, any person may initiate investigation by making a report to the National Authority for Data Protection and Freedom of Information (<u>http://naih.hu/;</u> H-1530 Budapest, P.O. box 5.; phone: +36 (1) 391-1400; fax: +36 (1) 391-1410; e-mail: <u>ugyfelszolgalat@naih.hu</u>), claiming any infringement relating to their personal data or associated with the exercise of the rights to have access to public information or information of public interest, or if there is an imminent danger of such infringement.

The detailed description of rights and legal remedies relating to data processing are provided in Sections 13–17 and 30 of the Info Act.

Prior to the initiation of any procedure, it may be appropriate to send the complaint to the controller.

18. Public communication options and other matters

You can use the public communication channels connected to our services at your own risk. The personal intellectual rights of various comments belong to the specific users, but the given user may not enforce any claim for property rights or demands against the controller; furthermore, the controller shall have the right to make reference to such comments without limitations, and may make copies of and/or moderate and/or modify them.

It is possible for registered users to send their opinions and comments to the controller, while the controller may not publish, but delete comments that violate law or personality rights, or comments that do not comply with the business policy or principles of the controller. Moreover, comments may be printed, downloaded or distributed by third persons for personal use only, and may exclusively be used with the written consent of the controller.

Please note that any comments published via public communication channels and any other public communication are subject to the legal regulations governing public communication.

The use of the internet entails various threats to privacy. Please note that your opinion published at the website qualifies as personal data that is suitable for deriving special information about you, even your origin or political views. Such data may become available to anyone. It is therefore recommended to use PET technology (Privacy Enhancing Technology) in order to safeguard your personal data. Several websites contain information on this topic.

Important websites

- National Authority for Data Protection and Freedom of Information: <u>http://www.naih.hu/</u>
- National Media and Infocommunications Authority: <u>http://nmhh.hu/</u>
- Effective legal regulations: <u>www.magyarorszag.hu</u>