

PRIVACY NOTICE
on data processing in relation to business contracts
MET Magyarország Zrt. (MET Hungary Ltd.)
E2 Hungary Zrt. (E2 Hungary Ltd.)

Last modified: 02.04.2024.

1. GENERAL PROVISIONS AND CONTACT DETAILS

MET Magyarország Energiakereskedő Zártkörűen Működő Részvénytársaság (registered office: 1117 Budapest Dombóvári út 26., company registration number: 01-10-046485, "METHU") and **E2 Hungary Energiakereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság** (registered office: 1117 Budapest Dombóvári út 26., company registration number: 01-10-048540, "E2"; METHU and E2 are hereinafter collectively referred to as the "**Companies**", separately: "**Company**") process information considered as "personal data" in accordance with Article 4 (1) of Regulation (EU) 2016/679 (hereinafter referred as: "**GDPR**") in connection with natural gas sale and purchase / electricity sale and purchase contracts and in connection with contracts which are not under the scope of core activities of the Companies, concluded / contemplated with its present, former or future clients (hereinafter referred as: "**Clients**") in the subject of the provision of natural gas / electricity services and services which are not under the scope of core activities of the Companies, including in particular the entering into, performance, amendment and termination of such contracts. The present privacy notice (hereinafter referred as: "**Notice**") provides information on the processing of such personal data, as well as the rights and remedies of the Data Subjects pursuant to Articles 13 and 14 of the GDPR.

For more information on whistleblowing that may affect the Companies under *Act XXV of 2023 on complaints, whistleblowing and rules on reporting abuse*, please refer to the separate privacy notice of the Companies on data processing in relation to whistleblowing-systems.

A separate privacy notice available on the relevant platform is applicable to the processing of data via the internet interface for the purposes of submitting annual claims, managing requests for short-term extra capacity and providing consumer data.

Information on joint controllers:

Given the fact that the Companies jointly determine the purposes and means of the data processing during the course of the performance and administration of the Business Contracts, they are joint controllers in relation to the above mentioned data processing (Article 26 GDPR). METHU and E2 have entered into a joint controller agreement pursuant to Article 26 GDPR, in which they have determined their respective responsibilities in particular as regards the exercising of the rights of the data subject and their respective duties to provide information to the data subjects.

The Companies are jointly and severally liable to data subjects for fulfilling their obligations under the GDPR, so data subjects can exercise their rights against any Company. The Company which has or has had a contractual relationship with the relevant Client, or which has the potential to have such a relationship with the Client, is primarily responsible for the obligations of the controller in relation to the processing. Please direct your request, claim or complaint in the first instance to the Company which has/had a contractual relationship with the Client related to you or intends to enter into such a relationship.

Hereinafter, the term "Companies/Company" shall mean METHU and E2 collectively and, depending on the context, the Company acting in that respect (e.g., the Company that has entered into a contractual relationship with the Client).

In addition to this Policy, the provisions of other policies of the Companies, which do not contradict this Policy, shall also apply to certain data processing operations.

In connection with certain aspects of business contracts (e.g. client identification, "know your client" processes, conflict of interest checks, internal audit processes), the Companies may transfer information including personal data to MET Holding AG for the purpose of creating a unified administration within the group and coordinating business decisions and processes at group level. MET Holding AG is considered as a data processor of the Companies for some data processing (where MET Holding AG does not make any substantive decisions on the purpose and means of processing personal data, but merely provides the technical conditions, e.g. uniform use of software), while for other processes it is considered as a joint data controller with the Companies (where MET Holding AG makes substantive decisions on personal data, e.g. the above mentioned Client identification, "know your client" processes, conflict of interest checks, internal audit processes. The companies belonging to MET Group have agreed (Intragroup Data Transfer Agreement) on the allocation of their responsibilities for the fulfilment of the obligations under the GDPR, whereby the Companies serve as the primary contact for the data subjects for the fulfilment of the essential obligations in relation to the processing of data under this Notice, as described above.

Contact details:

Registered seat of the Companies: H-1117 Budapest Dombóvári út 26.

Telephone number of the Companies: +36-30 731 9851

METHU's email address: info.methu@met.com;

METHU website: <https://hu.met.com/hu>

E2's email address: adatvedelem@e2hungary.hu

E2 website: <https://e2hungary.hu/hu/>

Contact details of MET Holding AG:

Address: Neuhofstrasse 24, 6340 Baar, Switzerland

E-mail: dataprotection@met.com

Contact details of the Data Protection Officer (hereinafter referred to as "DPO"):

Dr Simon Emese Júlia

DPO email address: MET-DPO@simonlegal.hu

2. THE UPDATING AND THE AVAILABILITY OF THE NOTICE

The Companies reserve the right to amend this Notice unilaterally, with effect from the date of publication. The Companies reserve the right to amend or withdraw the provisions of this Notice at any time at their unilateral discretion and will inform Clients thereof by making the current version of this Notice available on their website. In particular, the Notice may be amended in response to changes in legislation, the practices of data protection authorities, business needs or newly identified security risks.

3. THE SCOPE OF THE PROCESSED DATA AND THE PURPOSES OF THE DATA PROCESSING, SOURCE OF DATA

Source of the data: personal data is typically provided by the Client (a person acting in the

interest of or on behalf of the Client) or by the Data Subject.

Personal data may also come from publicly available source(s), such as:

- <https://www.e-ceggyezek.hu/>
- <https://www.opten.hu/>

Data subjects: the data subjects are the persons who act on behalf of, or represent the Clients, during the course of the preparation, entry into, performance or termination of the contract, either as representatives of the Clients or as contact persons of the Clients. Data Subjects may also be the executive officers and owners or beneficial owners of the Clients (collectively, the "**Data Subjects**").

Voluntary or obligatory nature of providing data: in principle, Data Subjects are not obliged to provide their personal data to the Companies. If the Data Subject is a business contact, the conclusion and performance of the Business Contract may be impeded without the processing of his/her data, which may lead to the termination of the Business Contract. The provision of certain data (e.g. the data listed in the Client identification section) is a prerequisite for the conclusion of Business Contracts.

Automated processing and profiling: the Companies carry out certain processing in an automated way, but do not make automated (without human intervention) decisions based on this processing, and the Companies do not carry out profiling in the context of business processing.

The scope of the data processed, the purposes of the processing, the legal basis of the processing and the duration of the processing are set out in the table below:

Data processing	Scope of data processed	Purpose of data processing	Legal basis of data processing	Retention period
Data processing in relation to offers / tenders	Name, position, workplace, telephone/mobile phone number, e-mail address, postal address (contact persons), in the case of a self-employed client, the address of the natural person, name, place and date of birth, name of mother, data concerning representatives, officers, beneficial owner, other personal data contained in specimen signatures, specimen signatures or authorisations	Managing call for tender, call for bid or bidding for concluding, amending or extending a Business Contract, rejection of a bid, communicating typically by e-mail, proof of the right to conclude a contract by a natural person acting on behalf of and representing the Client	Article 6(1)(f) GDPR legitimate interest identified. The Companies have a legitimate interest to act in connection with call for tender, call for bid, to identify the contracting entity, to facilitate the conclusion of business contracts, to conclude contracts, to amend or extend contracts.	For 5 years after the offer is communicated or the contract with the Client is terminated (Section 6:22 of Act V of 2013 on the Civil Code ("Civil Code"). (1) according to the general civil law limitation period)
Conclusion, amendment and termination of Business Contracts	The personal data included in the Business Contracts (name, position, name of the represented company, address of the natural person in the case of a self-employed client, name, place and date of birth, mother's name, signature of representatives, name, position, workplace, telephone/mobile	The conclusion, performance, amendment, termination and administration of the Business Contract (storage in paper and electronic form), the proof of the right to conclude the contract by the natural person acting on behalf of and representing the Client	Article 6(1)(f) GDPR legitimate interest identified. The legitimate interest of the Companies is the conclusion, amendment, termination and administration of the Business Contracts.	For 5 years after the termination of the contract with the Client (According to the Civil Code. 6:22. § (1) according to the general civil law limitation period)

	phone number in the case of contact details, e-mail address, postal address), other personal data contained in specimen signatures, specimen signatures or authorisations			
General data processing in relation to the performance of Business Contracts, communication purposes	Name, position, workplace, telephone/mobile phone number, e-mail address, mailing address (contact persons)	Communication and coordination during the performance of services, rights and obligations under the Business Contract and relevant business regulations, typically by e-mail and telephone (e.g. billing, metering, settlement, financial, nomination contractual contacts), providing information according to the Business Code, conducting procedures, controls, inspections, investigations, interventions (gas leakage, malfunction, metering, equipment maintenance, replacement, inspection, measures related to irregular purchases, etc.), recording the contact persons' data in the Companies' IT systems	Article 6(1)(f) GDPR legitimate interest identified. The Companies have a legitimate interest in contacting Clients and effective communication with Clients in order to perform the Business Contracts and to settle accounts in relation to the Services.	For 5 years after the termination of the contract with the Client (According to the Civil Code. 6:22. § (1) according to the general civil law limitation period)
Invoicing and keeping accounting documents	Personal data listed in Business Contracts, invoices and other accounting documents (see above)	Fulfilling invoicing, invoice notification and other accounting obligations of the Companies, fulfilling the obligation to keep the hard copies and electronic versions of the accounting documents, internal registration of contracts and supporting documents, accounting tasks	Processing necessary for the fulfilment of legal obligations of the Companies pursuant to Article 6(1)(c) GDPR.	8 years after the accounting document is generated (pursuant to Articles 168-169 of Act C of 2000 on Accounting ("Act on Accounting"))
Claims management, claim enforcement	Name, position, workplace, telephone/mobile phone number, e-mail address, postal address (contact persons, representatives, senior officials in the event of proceedings) for self-employed clients, the address, name, date and place of birth, mother's name of the natural person	Enforcement of claims of the Companies (e.g. sending reminders, demand letters by electronic and postal mail, initiation of payment order or liquidation proceedings, initiation of litigation, transmission of data for these purposes (e.g. lawyers, notary, court)	Article 6(1)(f) GDPR legitimate interest identified. The legitimate interest of the Companies is the enforcement of their legitimate claims, the enforcement of claims before public authorities.	In case of claims management, for 5 years after the termination of the contract with the Client. In the case of claim enforcement, until 5 years after the final termination of the official, judicial or other proceedings in connection with the claim (The Civil Code. 6:22. § (1) according to the general civil law limitation period)
Client identification, "know your client" processes, conflict of interest checks	Name, position, place of work, telephone/mobile phone number, in case of self-employed client, address of the natural person, name, place and date of birth, mother's name, email address, postal address, possible conflict of interest information, signatures, nationality for owners, prominent public	Conducting the Client KYC procedures is necessary for the establishment of the business relationship, identifying the legal and economic risks that may affect the Companies and MET Group, conducting further investigations in case of risk, deciding whether or not to enter into the contract.	Article 6(1)(f) GDPR legitimate interest identified. The Companies have a legitimate interest in identifying the potential risks of a business relationship before establishing a business relationship.	For 5 years after the termination of the contract with the Client (According to the Civil Code. 6:22. § (1) according to the general civil law limitation period)

	figure status, including close relatives of the owner (contacts, senior management and business owners)			
Operating personal, telephone and electronic customer services, handling complaints	Name, position, workplace, telephone/mobile phone number, e-mail address, postal address, personal data relating to the subject of the contact, record, additional data requested for the purpose of a complaint.	In order to ensure direct contact with the Buyers, to handle notifications, investigate complaints and inform the Buyers, the Seller or its agent operates personal, telephone and electronic customer services.	Article 6(1)(f) GDPR legitimate interest identified. The legitimate interest of the Companies in the course of business relations is to maintain contact, to handle notifications and complaints and to investigate them.	For 5 years after the termination of the contract with the Client (According to the Civil Code. 6:22. § (1) according to the general civil law limitation period)
Voice recording in case of telephone customer service	The voice of the data subject (the person using the Companies' telephone customer services), the information provided during the conversation, if it contains personal data	Documenting and verifying what is said when Clients report or complain, monitoring and evaluating the work of our Client service staff, training our Client service staff, improving our services.	Article 6(1)(a) GDPR consent set out in.	For 5 years after the termination of the contract with the Client (according to the Civil Code. 6:22. § (1) according to the general civil law limitation period)
Managing and administering the change of a user, switch of traders	Name, title, signature of the representative, name, title, place of work, telephone number/mobile phone number of the contact person for the transferor and transferee, e-mail address, postal address, name of the natural person in the case of a self-employed person, address, name, date and place of birth, mother's name	Managing and administering changes of user and trader, concluding contracts	Article 6(1)(f) GDPR legitimate interest identified. The legitimate interest of the Companies is to ensure the continuity of contracts.	For 5 years after the termination of the contract with the Client (According to the Civil Code. 6:22. § (1) according to the general civil law limitation period)
Consumer satisfaction survey, public opinion poll	Name, position, workplace, telephone/mobile phone number, e-mail address, mailing address (contact persons)	Measuring Client satisfaction with the services of the Companies, listening to Client feedback and thereby improving the Company's services	Article 6(1)(f) GDPR legitimate interest identified. The legitimate interest of the Companies is the continuous improvement and development of the quality of their services.	Pending the exercise of the Data Subject's right to object.
Direct business acquisition, marketing enquiries	Name, position, workplace, telephone/mobile phone number, e-mail address, mailing address (contact persons)	Direct marketing contacts with the business as the addressee of the request (e.g. e-mails, telephone enquiries for information, contract opportunities, terms and conditions, promotion of services, information about events), unless the data subject objects to the processing.	Consent as defined in Article 6(1)(a) of the GDPR, or Article 6(1)(f) legitimate interest identified. The legitimate interest of the Companies is to communicate services and business opportunities to potential business partners and thereby promote the growth and profitability of the Companies (see recital 47 of the GDPR).	Pending the exercise of the Data Subject's right to object.

<p>Events: processing of data relating to our clients, prospective clients and potential clients attending events, including the taking of photographs and videos at events</p>	<p>Name, email address, phone number, company represented, date of birth, registration number, food intolerance, name and age of any family member attending the event, photos and videos taken at the event</p>	<p>To obtain the necessary information to ensure the smooth running of the client event (accommodation, catering, parking, insurance, registration, etc.).</p> <p>The purpose of the processing of photos and videos is to provide information about MET Group events (including the sharing of photos and videos on public platforms such as website, LinkedIn, Facebook, etc.), to promote MET Group, PR and marketing activities, brand building.</p> <p>Our service partners (e.g. contracted photographer, event organiser, etc.) who are entrusted with the organisation of events are considered data processors in relation to the personal data processed in connection with the events, and as such may have access to certain personal data to the extent necessary for their tasks.</p>	<p>Consent of the Data Subject pursuant to Article 6(1)(a) GDPR / In case of processing of a special category of personal data, the Data Subject's explicit consent pursuant to Article 9(2)(a) GDPR.</p> <p>The legal basis for the processing of photographs and videos of participants as a "crowd" is Article 6(1)(f) of the GDPR.</p> <p>legitimate interest identified. The legitimate interest of the Companies is to raise the profile of the Companies and to create a positive image of the Companies.</p> <p>In the case of photographs and videos depicting participants individually or with an individual representation, the legal basis for processing is the consent as defined in Article 6(1)(a) of the GDPR. Consent is given by the participant by taking part in the production of such photographs and videos.</p>	<p>Data related to the organisation of the event will be deleted immediately (within a reasonable time) after the event.</p> <p>Photos and videos taken at events will be processed and used until the data subject objects or withdraws his or her consent.</p>
<p>Details of proxies given to external salespersons acting for business purposes</p>	<p>Personal data in the authorisations: name, address/place of residence, date and place of birth, mother's name</p>	<p>Management and retention of authorisations given to salespersons for the purpose of obtaining business for the purpose of subsequent proof of the legality of the conclusion of the contract.</p>	<p>Article 6(1)(f) GDPR legitimate interest identified. It is in the legitimate interest of the Companies to be able to prove the legitimacy of the person acting in the course of the negotiations prior to the conclusion of the contracts and the legality of the conclusion of their business contracts afterwards.</p>	<p>For 5 years after the termination of the contract with the Client (According to the Civil Code. 6:22. § (1) according to the general civil law limitation period)</p>

The Companies have carried out a balancing of interests test, in which they have determined that without the processing of the personal data identified in this Notice, the performance of their contracts (preparation, modification, termination), the fulfilment of certain legal obligations of the Companies, the enforcement of claims and the protection of the interests of the Companies at an adequate level would not be possible. Given that the Companies will in any case inform the Data Subjects of the fact and the relevant circumstances of the processing, which falls within the scope of processing of a general business nature, the Data Subjects will not be caught unawares, the duration of the processing will be proportionate and adapted to the purpose to be achieved, the purpose of the processing cannot be achieved by measures involving minor restrictions, the Companies have assessed that their processing of a commercial nature meets the necessity-proportionality requirement, and the processing can therefore be lawfully carried out on the basis of the legitimate interests of the Companies.

4. PERSONS AUTHORISED TO PROCESS DATA

The Companies are entitled to use data processors for the performance of certain processing activities, with whom they shall enter into an agreement pursuant to Article 28(3) of the GDPR regulating the subject matter, duration, nature and purpose of the processing, the type of personal data, the categories of data subjects, and the obligations and rights of the data controllers. The Companies may provide information on the identity of the data processors they currently use by contacting the contact details indicated in this Notice.

5. TRANSFERS TO OTHER CONTROLLERS

If the Client fails to comply with its contractual obligations, the Companies may transfer the necessary data (including Personal Data) to a third party, who is also bound by confidentiality, for the purpose of Client identification and/or enforcement of a claim.

In the event of a transfer, the Companies may transfer to the party entering into the Business Contract, the Business Contract and the data necessary for the performance of the Business Contract (including any personal data relating to contacts, officers, owners). The party or parties that may enter into the Business Contract are considered as independent data controllers.

On the basis of the Client's authorisation under the Business Contract, the Companies are entitled to transfer to the system operators under contract with them and to the intermediaries in these contracts, for the purposes of the Business Contract, the data necessary for the purpose of the processing, including the personal data of the contact persons necessary for the purpose of the processing, in order to provide the Client with the services. Such persons and entities shall be bound by the same confidentiality obligations as the controller in relation to the data transferred.

In addition, if absolutely necessary, e.g. in connection with a legal dispute or in order to assess the financial or accounting aspects of a business event, the Data Subject's data may be transmitted on a case-by-case basis to service providers engaged by the Companies, e.g. lawyers, auditors, financial advisors, who are bound by professional or contractual confidentiality.

6. DATA SECURITY MEASURES

Taking into account the state of science and technology and the cost of implementation, as well as the nature, scope, context and purposes of the processing and the varying likelihood and severity of the risk to the rights and freedoms of natural persons, the Companies shall implement appropriate technical and organisational measures, as defined in specific internal rules, to ensure a level of data security appropriate to the level of risk.

The Companies shall take appropriate organisational and technical measures to protect the data, in particular against unauthorised access, alteration, transfer, disclosure, deletion or destruction, accidental destruction or damage, and against inaccessibility resulting from changes in the technology used. In the course of these activities, the Companies shall ensure, inter alia, that the data:

- a) archiving: data that no longer need to be processed and remain unchanged should be separated from the active part and the data made passive should be recorded on a durable medium;
- b) fire safety: data and databases must be stored in a room equipped with fire and property protection equipment;
- c) virus protection: the desktops of administrators and staff handling data must be protected against viruses;
- d) access protection: data can only be accessed with a valid, personal authorisation;
- e) network security: using the computer tools available at all times, you must prevent unauthorised access to servers storing data that can be accessed over the network.

The Companies limit the number of employees who have access to personal data. Personal data processed in connection with Business Contracts is accessible to employees of the Companies' departments dealing with retail and wholesale, legal, receivables management, finance and marketing activities to the extent necessary for the performance of their duties.

7. THE RIGHTS AND LEGAL REMEDIES AVAILABLE TO DATA SUBJECTS

7.1 Rights and legal remedies related to data protection

The Data Subjects' data protection rights and remedies are set out in detail in the relevant provisions of the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80 and 82 of the GDPR). The following summary sets out the most important provisions and the Companies will accordingly provide information to Data Subjects on their rights and remedies in relation to data processing.

The Companies shall inform the Data Subject of the measures taken in response to his/her request without undue delay, but in any event within one month of receipt of the Data Subject's request to exercise his/her rights (see Articles 15-22 GDPR). If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Companies shall inform the Data Subject of the extension of the time limit within one month of receipt of the request, stating the reasons of the delay.

The Companies shall provide the information requested by the Data Subject in writing or, in the case of a request submitted electronically or at the request of the Data Subject, electronically. The Data Subject may also be provided with information orally, provided that the Data Subject confirms his or her identity to the Companies.

7.2 Right of access by the Data Subject

- (1) The Data Subject is entitled to receive feedback from the Companies on whether their personal data is being processed. If such processing is ongoing, the Data Subject is entitled to access to the personal data and the following information:
 - a) the purposes of the processing;
 - b) the categories of personal data concerned;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed by the Companies, including in particular recipients in third countries or international organisations;
 - d) where applicable, the envisaged period of storage of the personal data or, if this is not possible, the criteria for determining that period;
 - e) the Data Subject's right to request the Companies to rectify, erase or restrict the processing of personal data concerning him or her and to object to the processing of such personal data;
 - f) the right to lodge a complaint with the supervisory authority; and
 - g) where the data have not been collected from the Data Subject, any available information about their source;
 - h) the fact of automated decision-making (Article 22(1) and (4) GDPR), including profiling, and, at least in these cases, the logic used and clear information on the significance of such processing and the likely consequences for the Data Subject.
- (2) If personal data are transferred to a third country or an international organisation, the Data Subject is entitled to be informed of the appropriate safeguards regarding the transfer.

The Companies shall provide the Data Subject with a copy of the personal data processed. For

additional copies requested by the Data Subject, the Companies may charge a reasonable fee based on administrative costs. If the Data Subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

7.3 Right to rectification

The Data Subject is entitled to have inaccurate personal data relating to him or her corrected by the Companies without undue delay upon his or her request. The Data Subject shall also have the right to request that incomplete personal data be completed, inter alia, by means of a supplementary declaration.

7.4 Right to erasure ("right to be forgotten")

- (1) The Data Subject has the right to obtain, upon his or her request, the erasure of personal data relating to him or her by the Companies without undue delay if one of the following grounds applies:
 - a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by the Companies;
 - b) the Data Subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
 - c) the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
 - d) the personal data have been unlawfully processed;
 - e) the personal data must be deleted in order to comply with a legal obligation under Union or Member State law applicable to the Companies; or
 - f) personal data are collected in connection with the provision of information society services.
- (2) If the Companies have disclosed the personal data and are required to delete it as described above, they will take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the data controllers that the Data Subject has requested the deletion of the links to or copies of the personal data in question.
- (3) Paragraphs 1 and 2 shall not apply where the processing is necessary for, inter alia:
 - a) to exercise the right to freedom of expression and information;
 - b) for the purposes of complying with an obligation under EU or Member State law that requires the processing of personal data applicable to the Company;
 - c) in the public interest or in the exercise of official authority vested in the Company;
 - d) to achieve a public interest in the field of public health;
 - e) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where the right referred to in paragraph 1 would be likely to render such processing impossible or seriously impair it; or
 - f) to bring, enforce or defend legal claims.

7.5 Right to restriction of processing

- (1) The Data Subject shall have the right to obtain from the Company restriction of processing where one of the following applies:
 - a) the accuracy of the personal data is contested by the Data Subject, for a period enabling the Company to verify the accuracy of the personal data;
 - b) the processing is unlawful and the Data Subject objects to the deletion of the personal data and requests the restriction of the use thereof instead;
 - c) the Companies no longer need the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defence of

- legal claims; or
 - d) the Data Subject has objected to the processing, in which case the restriction shall apply for the period until it is established whether the legitimate grounds of the Companies prevail over the legitimate grounds of the Data Subject.
- (2) If the data processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.
- (3) A Data Subject who has obtained restriction of processing pursuant to paragraph (1) shall be informed by the Companies before the restriction of processing is lifted.

7.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing

The Companies shall inform all recipients of any rectification, erasure or restriction of processing to whom or with which the personal data have been disclosed, unless this proves impossible or involves a disproportionate effort. Upon request, the Companies will inform the Data Subject of these recipients.

7.7 Right to data portability

- (1) The Data Subject is entitled to receive the personal data concerning him or her that he or she has provided to the Companies in a structured, commonly used, machine-readable format and is entitled to transmit such data to another controller without hindrance from the Companies, if:
- a) the processing is based on consent or a contract; and
 - b) the processing is carried out by automated means.
- (2) In exercising the right to data portability under paragraph (1), the Data Subject shall have the right to request, where technically feasible, the direct transfer of personal data between data controllers (such as the Companies and other data controllers).
- (3) The exercise of the right described above must be without prejudice to the provisions on the right to erasure ("right to be forgotten") and must not adversely affect the rights and freedoms of others.

7.8 Right to object

The Data Subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data based on legitimate interests, including profiling. In this case, the personal data will no longer be processed by the Companies, unless it is demonstrated that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the Data Subject or are related to the establishment, exercise or defence of legal claims.

7.9 Right to lodge a complaint with the supervisory authority

The Data Subject has the right to lodge a complaint with the supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the Data Subject considers that the processing of personal data relating to him or her infringes the provisions of the GDPR. In Hungary, the competent supervisory authority is the **National Authority for Data Protection and Freedom of Information** (website: <http://naih.hu/>; address: 1055 Budapest, Falk Miksa utca 9-11; postal address: 1363 Budapest,

Pf.
5969; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu).

7.10 Right to an effective judicial remedy against the supervisory authority

- (1) The Data Subject shall have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning the Data Subject.
- (2) The Data Subject has the right to an effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the Data Subject within three months of the procedural developments or the outcome of the complaint lodged.
- (3) Proceedings against the supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

7.11 Right to an effective judicial remedy against the Companies or the data processor

- (1) Without prejudice to the administrative or non-judicial remedies available, including the right to lodge a complaint with the supervisory authority, the Data Subject has the right to an effective judicial remedy if he or she considers that his or her rights under the GDPR have been infringed as a result of the processing of his or her personal data in a way that does not comply with the GDPR.
- (2) Proceedings against the Companies or processors must be brought before the courts of the Member State in which the Companies or processors are established. Such proceedings may also be brought before the courts of the Member State where the Data Subject has his or her habitual residence. For further information on the contact details of the competent court, please visit the following website: <https://birosag.hu/>

7.12 Procedure to be followed in case of infringement of rights

- (1) The Company primarily responsible for the processing shall inform the Data Subject of the measures taken in response to his/her request without undue delay and in any event within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Company shall inform the Data Subject of the extension of the time limit, stating the reasons for the delay, within one month of receipt of the request. If the request has been made by electronic means, the information shall also be provided by electronic means where possible, unless the Data Subject requests otherwise. If the Company considers that it is not required to take action on the Data Subject's request, it will inform the Data Subject without delay, but at the latest within one month of receipt of the request, of the reasons for the lack of action and of the possibility to lodge a complaint with the Data Protection Authority and to exercise his or her right to judicial remedy.
- (2) The execution of requests is free of charge, however, if the request is clearly unfounded or excessive, in particular because of its repetitive nature, the Companies may charge a reasonable fee or refuse to execute the request, taking into account the administrative costs incurred as a result of the request.
- (3) If there is reasonable doubt about the identity of the Data Subject submitting the request, additional information necessary to confirm his or her identity may be requested.