

General Privacy Policy for Employees

The member companies of MVM Company Group listed in Annex 1 as Employers and Data Controllers (hereinafter: Employers or Data Controllers) provide the following information on their data processing of the personal data of

- natural persons wishing to establish employment relationship with the Employers (**hereinafter: Applicant**),
- natural persons having an employment relationship with the Employers (**hereinafter: Employee**), and
- natural persons performing work at the Employers under an agreement on temporary agency work (**hereinafter: Temporary Agency Worker**)

to the Applicants, Employees and Temporary Agency Workers (**in this Privacy Policy – if this Privacy Policy separately do not mention Applicant and the Temporary Agency Worker - jointly referred to as: Employee**).

Recitals

When you contact any of the Data Controllers or their agent for the purpose to establish an employment relationship, and later - upon your selection – conclude an employment agreement with any of the Data Controllers you provide us or our agent (in case of Applicants) with certain personal data of yours.

The main duty of the Data Controllers, Employers is to determine the scope of the personal data they process, the legal grounds, the purpose and tools of the data processing, the method of the data processing, plus to ensure the enforcement of the principles of data protection and the requirements of data security and hinder the unauthorized access to personal data, the alteration, unauthorized disclosure or use of personal data, furthermore to provide for protection against erasure, harm and destroy.

The members of the MVM Company Group listed in Annex 1 as Employers and Data Controllers call the attention to the fact that at MVM Company Group and its member companies based on their rightful legal interest a unified group level HR organization and HR sectors operate, which HR sectors manage all HR matters in relation to all Employees (including the Applicants and the Temporary Agency Workers also) of the member companies of MVM Group listed in Annex 1.

1. Definition of the Data Controllers, personal data and Data Subject

Data Controller means the legal entity who determines the purposes for which and the manner in which any personal data are, or are to be processed. In relation to this Policy the Data Controller(s) is(are) such group member company(ies) who perform work force recruitment activities, participate as a party to the employment agreement as employer, or employ a Temporary Agency Worker.

From the aspect of this Policy Personal Data shall mean 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 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).

2. Subject of this Privacy Policy, legislation serving grounds for the data processing

The present Privacy Policy pertains to the data processing of the Data Controller(s) in connection with work force recruitment, establishing employment relationship, facilitating the preparation of employment agreements, the conclusion, performance, possible amendment, termination of employment agreements and the hiring of Temporary Agency Workers.

For the processing of the personal data of Employees with reduced ability to work the same provisions apply as for other Employees of the Employers, in their case the scope of the processed personal data is wider, certain special category personal health data in relation to reduced ability to work are processed also (please see section 5).

The main legislation pertaining to the above data processing and the abbreviations applied in this Privacy Policy:

- the General Data Protection Regulation 2016/679 of the European Parliament and Council (EU) (April 27, 2016) on the protection of natural persons with regard to the processing personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation or GDPR)
- the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Privacy Act)
- the Act I of 2012 on the Labour Code (hereinafter: Labour Code)
- Act CXCI of 2011 on the benefits to persons with reduced ability to work and amendment of certain acts (hereinafter: Act on CXCI of 2011)

When preparing this Privacy Policy the guideline of the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) (hereinafter: „Guideline”) on the requirements of prior notification has also been taken into account.

The present Privacy Policy also serves the compliance with the provisions of subsection (5) of Section 10. § of the Labour Code (Employer notifies the Data Subject of its data processing under subsections (1)-(4) of Section 10. § of the Labour Code in writing).

3. Legal grounds of the data processing

According to subsection (1) of Article 6 of the General Data Protection Regulation processing of personal data shall be lawful only if and to the extent that at least one of the following conditions is met:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

The legal grounds for the data processing of the Employers are primarily the following points of subsection (1) of Article 6 of the General Data Protection Regulation:

- **point a) (data processing under consent)**
- **point b) (data processing necessary for the performance of contract)**
- **point c) (compulsory data processing required for compliance with a legal obligation),**
- **point f) (data processing necessary for the enforcement of legitimate interest)**

Employer may only require from the Employee such statement or disclosure of such personal data which is material from the aspect of establishing, performing, ending (terminating) the employment relationship or enforcing claims under the Labour Code.

Employer for the purpose of exercising its right or performing its obligation defined under Chapter III of the Labour Code may require provision of statements or disclosure of data. **Based on the above presentation of documents can be demanded.**

Only such suitability assessment can be applied in respect of the Employee which is prescribed by employment regulations, or which is necessary for the interest of exercising rights and performing obligations defined by employment regulations (**subsections (1)-(4) of Section 10. § of the Labour Code, compulsory data processing required by the Labour Code**).

a.) **In case of Applicants** (recruiting, creating an HR data base, sending curriculum vitae and other information to the Data Controller or its representative, preparing the conclusion of the employment agreement) the data processing in all events is based on **in accordance with point a.) of subsection (1) of Article 6 of the General Data Protection Regulation the voluntary consent of the Data Subject to the processing his/her personal data voluntarily handed over** to Data Controller or its representative.

- **The relevant Employer during the selection procedure may ask the Applicants to fill out skill and/or competency tests.**

The filling out of these tests and the related (pertaining to the processing of the data in the tests completed) data processing shall also and exclusively take place upon **the voluntary consent of the Data Subject as per Article 6 (1) a) of the General Data Protection Regulation** in respect of the personal data provided voluntarily by the Data Subject in the tests voluntarily completed for the Data Controllers or their agents.

Data Controller notifies the Data Subjects that based on the skill and/or competence tests **profile making may take place** during which the personal data may be used for valuating certain personal characteristics of the Data Subject, especially work place performance, personal preferences, interest, reliability, analysing or predicting characteristics of behaviour.

Information pertaining to the logic applied during the profile making, the significance of the data processing and the possible consequences for the Data Subject: the results will support the selection of the proper applicant who is most suitable for the scope of job. Data Controller has prepared a data protection impact assessment according to the General Data Protection Regulation which can be viewed as the organizational unit performing recruitment for the HR organization of the Data Controller. As a result of this assessment it can be stated that the data processing is based on the consent of the data subject.

The Data Controller ensures the voluntary nature of the consent in such way that the data subjects have real, influence free decision right regarding the giving and the revoke of the consent. The rejection of the consent will not have detrimental consequences on the Data Subjects.

- Data Controllers notify the Applicants that on their carrier portal it is also possible to apply for positions open for temporary agency workers. As per subsection (1) Section 214. §:
 - a) temporary agency work: when an employee is hired out by a temporary-work agency to a user enterprise for remunerated temporary work, provided there is an employment relationship between the worker and the temporary-work agency (placement),
 - b) temporary-work agency: any employer who places an employee, with whom it has an employment relationship, under contract to a user enterprise for temporary work supervised by the user enterprise,
 - c) user enterprise: any employer under whose supervision the worker performs temporary work,
 - d) temporary agency worker: a worker with an employment relationship with a temporary-work agency with a view to being assigned to a user enterprise to work temporarily, where employer's rights are exercised jointly by the temporary-work agency and the user enterprise.

In consideration of the above in case of applying for positions open for temporary agency workers the Applicant shall enter into an employment relationship not with any of the Data Controllers, but with the temporary-work agency for the purpose of being assigned, thus the Data Controller must forward the personal data it has received from the selected Applicant to its partners providing temporary agency work services for the Data Controller (HSA Kft., 1134 Budapest, Kassák Lajos u. 78. or Pannon-Work Zrt., 1111 Budapest, Bartók Béla út 16.).

Such personal data forwarding by the Data Controllers shall at all events be based under the consent of the Data Subject for the data forwarding according to Article 6. (1) a) of the General Data Protection Regulation.

b.) In case of **Employees** the Employers **process** the personal data material in respect of the conclusion, maintaining (payroll, holiday register, keeping of registers, conducting compulsory trainings, etc.), performance and termination of employment contracts **compulsorily provided** by the Data Subject to the Employers based on legal regulation or for the purpose of compliance with obligations set forth by law **under the legal authorization of subsections (1)-(4) of the Section 10. § of the Labour Code for the purpose of compliance with legal obligations pertaining to the Data Controller in accordance with point c.) of subsection (1) of Article 6 of the General Data Protection Regulation.**

Performance of occupational health medical examination is prescribed by law compulsorily, thus legal grounds for the processing of special category health data pertaining to the occupational health condition is **point c.) of subsection (1) of Article 6 and point h.) of subsection (2) of Article 9 of the General Data Protection Regulation** (data processing is necessary for preventive occupational health reasons, for measuring the Employees work ability).

The relevant Employer may ask certain Employees to complete skill and/or competency tests.

The completion of these tests and the related (pertaining to the processing of the data in the tests completed) data processing shall also and exclusively take place upon **the voluntary consent of the Data Subject as per Article 6 (1) a) of the General Data Protection Regulation** in respect of the personal data provided voluntarily by the Data Subject in the tests voluntarily completed for the Data Controllers or their agents.

Data Controller notifies the Data Subjects that based on the skill and/or competence tests **profile making may take place** during which the personal data may be used for valuating certain personal characteristics of the Data Subject, especially work place performance, personal preferences, interest, reliability, analysing or predicting characteristics of behaviour.

Information pertaining to the logic applied during the profile making, the significance of the data processing and the possible consequences for the Data Subject: the results will support the selection of the proper applicant who is most suitable for the scope of job. Data Controller has prepared a data protection impact assessment according to the General Data Protection Regulation which can be viewed as the organizational unit performing recruitment for the HR organization of the Data Controller. As a result of this assessment it can be stated that the data processing is based on the consent of the data subject.

The Data Controller ensures the voluntary nature of the consent in such way that the data subjects have real, influence free decision right regarding the giving and the revoke of the consent. **The denial of the consent will not have detrimental consequences on the Data Subjects, in connection with Employees it will not affect the employee's employment relationship.** In consideration of the dependency between the Employer and the Employee the voluntary nature of Employee's consent is ensured since the Employer provides the competency assessment as a service ensuring development for the Employees which performance is not compulsory.

c.) In case of **Temporary Agency Workers** the following special rules of the Labour Code shall pertain to the grounds of the data processing.

Temporary agency work shall mean when an employee is hired out by a temporary-work agency to a user enterprise for remunerated temporary work, provided there is an employment relationship between the worker and the temporary-work agency. **Temporary agency worker shall mean a worker with an employment relationship with a temporary-work agency with a view to being assigned to a user enterprise to work temporarily, where employer's rights are exercised jointly by the temporary-work agency and the user enterprise (subsection (1) of Section 214. § of the Labour Code).**

The legal grounds of the personal data processing in these events:

- the consent given by the temporary agency worker to the temporary work agency (**point a.) of subsection (1) of Article 6 of the General Data Protection Regulation**)
- performance of contract existing between the temporary agency worker and the temporary work agency (**point b.) of subsection (1) of Article 6 of the General Data Protection Regulation**)
- compliance with a legal obligation in consideration of the prevailing rules of the Labour Code (**point c.) of subsection (1) of Article 6 of the General Data Protection Regulation**)

The agreement between the placement agency and the user enterprise shall specify the material conditions of placement, and the sharing of employer's rights (subsection (1) of Section 217. § of the Labour Code). As part of the agreement on placement, for the purpose of performance the temporary-work agency hands over to the Employee as user enterprise the personal data of the temporary agency worker determined in details under section 3 of this Policy.

For the purpose to ensure the requirement of the principal of equal treatment (Section 219. § of the Labour Code) the temporary-work agency – **with the prior consent of the temporary agency worker** – shall inform the user enterprise especially about the qualification and professional experience of the Temporary Agency Worker. Based on the Labour Code the temporary-work agency upon the request of the user enterprise shall at the latest until the commencement of work by the temporary agency worker hand over the report made towards the state tax authority on the commencement of the insurance relationship required by the rule of law on taxation and pertaining to the data of the person employed by the temporary-work agency and the user enterprise.

The Employer as user enterprise shall **based on the Labour Code** supply all information to the temporary-work agency by the fifth day of the month following the current month, which are required for the payment of wages, and for carrying out tax declarations, data disclosure and payment obligations relating to the employment relationship. The user enterprise shall supply the above-specified information to the temporary-work agency within three working days from the last day of employment, if employment is terminated during the month. (point a.) of subsection (4) and subsection (5) of Section 217. § of the Labour Code)

d.) Certain special category personal data (**for example health data in relation to reduced ability to work**) the grounds for data processing are:

- **prior to the establishment of an employment relationship the specific voluntary consent of the Data Subject according to Article 6 (1) a) and Article 9 (2) a) of the General Data Protection Regulation**
- **after the establishment of the employment relationship, temporary agency work relationship data processing necessary for performance of contract and compliance with a legal obligation (points b.) and c.) of subsection (1) of Article 6 of the General Data Protection Regulation and**
 - **point b) of subsection (2) of Article 9 /the data processing is necessary for the performance of obligations and exercising specific rights of Employer or Data Subject arising from the legal regulations on employment, social security and social protection/, and**
 - **point h) of subsection (2) of Article 9 /the data processing is necessary for preventing health or occupational health purposes, assessment of the amplee's work ability/.**

In case of data processing required for performance of legal obligations related to employees with the reduced ability to work the rules of law regulating the obligation: the provisions of the Act CXCI of 2011 referred to in this Policy and Section 120. § of the Labour Code.

e.) In other events (e.g. conducting internal examinations, governance of company group, operation of group level HR, HR sectors as defined above, performance of contract SLA, etc.) – if neither of the above described legal grounds exist – the data processing is required for the enforcement of the legitimate interest of the Employers, thus the data processing is based on **point f.) of the subsection (1) of Article 6 of the General Data Protection Regulation**.

The balancing test pertaining to the data processing is available at the data protection officers of the Data Controllers.

Further details of the data processing, the legal grounds for data processing as per the data processing purposes are defined in the table under Section 12.

4. Purposes of the data processing of the Employer

a.) In case of **Applicants** the purposes of data processing are the conducting of the internal HR procedure required for the selection by Data Controller or its representative, in case of successful application, selection of the applicant the preparation of the employment agreement, in case the application fails registration in the Data Subject's data bank for the purpose to later forwarding job possibilities to applicant meeting the applicant's professional experience, qualifications.

b.) In case of **Employees** the purposes of the data processing are the establishment, maintenance of the employment relationship, performance of the employer's obligations under law or the employment contract arising from the employment (especially for example payment of salary and other benefits, deductions of taxes and contributions, granting holiday, etc.) and exercising employer's right under law or the employment contract, in connection with the Employer's projects planning, registration of work force requirements, attending internal inspection, security activities, furthermore termination of employment relationship and provision of data required by law (e.g. towards the pension fund).

Employer may use the Employee's personal data for statistical purposes and may also forward – without the employee's consent, in a manner unsuitable for identification - those for use for statistical purposes.

c.) In case of **Temporary Agency Workers** the purposes of the data processing are the performance of the agreement on placement between the temporary-work agency and the Data Controller as user enterprise and the the legal requirements of the Labour Code on temporary agency work.

According to the Act on taxation the user enterprise shall report to the state tax authority in respect of the employment in the frame of the temporary agency work:

a) on the day before the commencement date, but at the latest on the commencement date the name and tax ID number - in the lack of such the personal identification data and address - of the subject temporary agency worker, plus the name and tax number of the temporary work agency and the commencement date of the placement,

b) on the day following the termination the name and tax ID number of the subject temporary agency worker, plus the name and tax number of the temporary work agency and the termination date of the placement

Information on the joint data processing of the Temporary Work Agencies being in contractual relationship with the Employers and the subject Employer as user enterprise:

The subject Employer as user enterprise and HAS Kft., 1134 Budapest, Kassák Lajos u. 78., as temporary work agency, and Pannon-Work Zrt., 1111 Budapest, Bartók Béla út 16., as temporary work agency in the scope determined by the affected parties in harmony with Article 26 of the General Data Protection Regulation qualify as joint data controllers, thus in this scope they determine the purposes and means of the data processing jointly. The joint data processing shall take place in respect of the following data as per the agreement of the parties:

Scope of data	Legal grounds of the processing (GDPR)	Legal grounds of processing (Labour Code)
Data included in the report towards the state tax authority on the commencement if the insurance relationship (T1041)	Article 6 subsection (1) c) point	Section 217. § subsection (4) point a) of the Labour Code
Data pertaining to the work time (e.g. attendance sheet, holiday, etc.)	Article 6 subsection (1) c) point	Section 217. § subsection (5) of the Labour Code
Data in connection with payroll (e.g. payment titles, amounts)	Article 6 subsection (1) c) point	Section 217. § subsection (5) of the Labour Code
Personal data in relation to damage caused to the user enterprise or third parties	Article 6 subsection (1) c) point	Section 221. § of the Labour Code
Personal data in relation to work- and accident protection	Article 6 subsection (1) c) point	Section 2018. § subsection (4) point a) of the Labour Code, Section 9. § subsection (1) point e) of the MüM Decree 5/1993 (XII.26.)
Personal data included in the employment contract, data necessary to ensure work- and employment conditions (e.g. facts of maternity, nursing, qualification as young employee, size for work safety clothing, amount of salary, other remuneration)	Article 6 subsection (1) c) point	Section 218. § subsection (4) point b) of the Labour Code

Complaints in connection with the work performance, behaviour of the employee, personal data in connection with breach of duty	Article 6 subsection (1) c) point	Section 220. § subsection (5) of the Labour Code
Forwarding of the employee's contact data	Article 6 subsection (1) f) point	Such legitimate interest of the parties that during the placement they can exercise their rights and perform their obligations smoothly

d.) In case of **Employees with reduced ability to work** the special purposes of the data processing are:

Based on Section 120. § of the Labour Code in connection with the use of extra vacation due to employees with reduced ability to work, employees entitled to disability allowance or special aid for the blind **for the purpose to establish the entitlement for extra vacation time** the Employer may process the personal data of the Data Subject determined under Section 5/d).

Section 23. § subsection (7) of the Act CXCI of 2011 prescribes that the employer employing employees with reduced ability to work for the purpose to establish the rehabilitation benefits shall keep a register and in this register may process the personal data of the Data Subjects defined under Section 5/d.) in harmony with the Act CXCI of 2011.

Detailed definition of the data processing purposes of the data processing under this Privacy Policy are included in the table under Section 12.

5. Scope of the personal data processed by the Data Controllers/Employees, source of the data

The scope of personal data processed by Data Controllers/Employers include all such personal data which Data Controllers/Employers must process for its selection process, during the preparation for establishing the employment relationship, the establishment, maintenance and termination of the employment or after termination until the period defined by legislation (e.g. personal data including the employment contracts, salary data, scope of job, tax returns, social security, etc. data), in this scope the source of the data is the subject Applicant or Employee.

From the Employee, or from the Applicant during application for job advertisements (advertisements, interviews, etc.) personal data on family status, living conditions, parents' occupation, political opinion, religious, philosophical standpoint or other personal data not related to the employment relationship due to the lack of data processing purpose cannot be requested.

Data pertaining to health status, chronic illness, smoking, severe addiction qualify as special category of personal data, thus provision of such data and their processing shall always be subject to the data subject's written consent or legal regulation.

From the Employees only such statement or disclosure of data can be requested which does not infringe their personal rights and material from the aspect of establishing, performing or terminating the employment relationship.

Only such suitability assessment can be applied in respect of the Employee which are prescribed by employment regulation or which is necessary with a view to exercising rights, and performing obligations defined by employment regulations.

a.) In case of Applicants: prior to establishing an employment relationship the **Applicant** may provide to the Data Controller or its representative his/her personal data necessary for the purpose of selection by Data Controller and (upon selection) for the purpose to establish the employment relationship.

The scope of these personal data are especially: personal identification data, data certifying qualification, education, photo, upon establishment of employment relationship the personal data necessary to prepare an employment agreement and the data being part of the employment agreement.

The scope of these personal data are especially: personal identification data, data on qualification and professional experience, salary request, photo, upon establishment of an employment relationship the data necessary to prepare the employment contract and the data being part of the employment contract, etc.

Furthermore all such personal data which the Applicant during his/her application to the job advertisement/tender has provided voluntarily to the Data Controller or its representative in the documents submitted or in any other way (application, curriculum vitae, motivation letter, certificate of qualification, special category of health data pertaining to the reduced ability to work in case of Applicants with health impairment, etc.).

b.) At the time of establishing the employment relationship **the Employee** provides to the Employer his/her personal data necessary for the establishing the employment and exercising his/her rights and perform his/her obligations under law and contract.

Personal data processed for the purposes defined under Section 4/b. are especially:

- Name
- Birth name
- Birth place
- Birth date
- Mother's maiden name
- Address (permanent address)
- Residence (if deviates from address)
- Tax identification number
- Social security number (TAJ)
- Pension identification number (in case of pensioner employees)
- Identification card number
- Address card number
- Bank account number
- Copy of certificate of qualification
- Salary
- Scope of job
- Work time
- Work order
- Work place
- Data on professional qualification
- Data on professional experience
- Data on sick leave, holiday
- Name, birth place and date of child under the age of 16 (if employee wish to take extra holiday after children)
- Photo (only upon consent)

After the establishment of the employment relationship, during the existence of the employment the Employer may also receive and process other personal data which it became to his knowledge inevitably (e.g. personal data regarding the Employee's abilities, behaviour in connection with the employment, etc.), or from external organs (e.g. payment order received from executors, data sent by health occupation medical service provider regarding the health condition of the Employee, etc.).

c.) In case of **Temporary Agency Workers** the temporary work agency and the Data Controller as user enterprise provides to the other the personal data of employee necessary for the performance of the placement agreement and the provisions of the Labour Code pertaining to temporary agency work.

Personal data processed are especially:
Name, Birth name, Birth place, Birth date
Scope of job, Work time
Work order
Tax identification number
Social security number (TAJ)
Data on professional qualification
Data on professional experience
Data on sick leave, holiday

d.) In case of **Employees with reduced ability to work** further data subject to data processing:

Based on Section 120. § of the Labour Code in connection with the use of extra vacation by employees with reduced ability to work personal data certifying the entitlement for the extra vacation, e.g. data included in any document presented by the Employee in order to verify his/her reduced work ability, the entitlement to disability allowance or special aid for the blind, the fact or presentation of such documents, the name of the person checking the documents and the date of such checking.

Data defined under Section 21/C. § subsection (3), Section 21. § subsection (1) point a) subpoint ab) and point c) of the Act CXCI of 2011, i.e. special category health data of the Data Subject employee having a reduced ability to work pertaining to his/her health condition, ability to work, rehabilitation possibilities and any changes therein and the personal data pertaining to circumstances laid down during a complex qualification.

Therefore in case of Employees with reduced ability to work the Employers for the above defined purposes may process the above personal data of the Employees with reduced ability to work, such as for example the personal data included in the documents containing special category personal data on health status (expert opinion of professional committee, resolution on reduced ability to work, etc.), other special category of personal data pertaining to the employees with reduced ability to work, for example data on the extent of reduction of the work ability, extent of the health impairment, the fact of disability, the fact or presentation of such documents, the name of the person checking the documents and the date of such checking.

In consideration of Section 23. § subsection (7) of the Act CXCI of 2011 the register kept by the employer employing employee with reduced ability to work for the purpose to establish the rehabilitation benefits contains the personal identification data, the social security number of the employee having reduced ability to work, the extent of the reduction of the work ability, the health condition and the health impairment, the fact of the disability, plus the copy of the documents verifying these.

Source of the data: directly the Data Subject.

The detailed definition of the data processed during the data processing under this Privacy Policy categorised as per processing purposes , the source of the data are included in the table under Section 12.

6. Persons having authorization to access the personal data, reasons of data forwarding

During the personal data processing conducted by Data Controllers/Employers in accordance with this Policy **the person exercising employer's rights** as per the Organizational and Operational Rules of the subject Employer, plus the **employees of the unified group level HR of the Employers during the attendance of their work will have full access to the personal data of the Employees.**

In connection with the projects of the Employers for the purpose of planning and registering human resource requirements the employees taking part in the Employer's Project will have access to the personal data of the Employees required and sufficient for the project.

For the purpose to attend internal audit- or security activities affecting the subject Employer the employees of the group level Internal Audit organisation, and the employees of the Security organisation will have access to the personal data required for or became known in connection with the internal audit or security activity of the subject Employer.

In case of legal procedures initiated by or initiated against the subject Employer the Legal organisation of the Employers may have access to the personal data of the Employee.

The recipient of the data forwarding by the Data Controllers may be as an independent data controller MVM Energetikai Zártkörűen Működő Részvénytársaság (registered seat: 1031 Budapest, Szentendrei út 207-209., registration no.: 01-10-041828, hereinafter: MVM Zrt.), as the controlling company of the MVM Company Group for the purpose of its task arising thereof.

In case of the Data Processors detailed under section 9 the reason of the Data Controller's data forwarding is that the Data Processors can attend their data processing tasks described under section 9.

The persons having access to the data defined in this Privacy Policy are included in the table under Section 12.

In case of the Data Processors detailed under section 9 the reason of the Data Controller's data forwarding is that the Data Processors can attend their data processing tasks described under section 9.

Furthermore the Data Controller will only forward the personal data of the Data Subject to other parties in exceptional cases. For example if a court procedure is initiated between the Data Subject and the Data Controller and documents containing the personal data of the Data Subject is submitted to the acting court. If the police or other authority contacts the Data Controller and requests submission of documents containing the personal data of the Data Subject for their investigation, procedure, the forwarding of the requested personal data is compulsory. Moreover the attorney attending the legal representation of the Data Controller will have access to the personal data if a legal dispute arises between the Data Subject and the Data Controller.

7. Term and deadline of keeping the personal data

a.) In case of **Applicants** the Data Controller processes the personal data provided by the Applicant **until the establishment of the employment relationship fails**, or upon the separate consent of the Applicant until the date defined below.

If the Applicant is not selected by the subject Data Controller, the Data Controller does not wish to establish employment relationship with the Applicant, then the Applicant in the knowledge of this prior notification may voluntarily consent to Data Controller or its representative that against the failure of his/her application Data Controller may process the Applicant's personal data included in the documents the Applicant has submitted during his/her application/tender (application, curriculum vitae, motivation letter, documents certifying education, etc.) in harmony with the prevailing legislation for the purpose of registration in Data Controller' databank of applicants, and later on possibly send the Applicant job offers suitable for the Applicant's professional experience and education until the **until the withdrawal of the Applicant's consent, but maximum until 12 (twelve) months**.

In the lack of such consent or in case of withdrawal of the consent or upon expiry of the 12-month term the personal data provided by the Applicant will be fully erased from Data Controller's databank.

b.) In case of **Employees** the Employers may process personal data for the above defined purposes during the term of the employment relationship, and after the termination of the employment relationship until the terms defined by law (during which term Employer is obliged the reserve the data pertaining to the employment with the employee).

- **In relation to employment relationship** such documents, which relate to the establishment, existence, termination of the employment relationship: the general rule is for three (3) years from the termination of the employment relationship.
 - Prevailing rule of law: Section 286. § subsection (1) of the Labour Code (labour law claims lapse after three years)
This includes: legal statement defined by Sections 14-18 § of the Labour Code: employment agreement, study contract, instruction, undertakings, employer's rules, notification.

Claims for the reimbursement of damages caused by criminal acts, restitution due to breach of personal rights and related documents: **five (5) years**, since five-year (5-year) lapse time pertain to these claims.

- In connection with tax establishment or documents containing personal data of Employees required thereof: five (5) years from the last day of the calendar year in which the tax return, data reporting, reporting should have been made, or in the lack of returns, data reports, reports the tax should have been paid. However the provisions of Section 203. § of the Act CL of 2017 on the Rules of Taxation (Act on Taxation) in which cases the elapse period may be prolonged.
 - Prevailing rule of law: Section 202. § subsection (2) of the Act on Taxation: the right to determine tax shall lapse after five years from the last day of the calendar year in which the tax return, tax report, report should have been made, or in the lack of return, data report, report the taxes should have been paid. For applying for budget support, right to reclaim overpayment – if law does not determine otherwise – shall lapse after five years from the last day of the calendar year in which the right to apply has occurred. Furthermore the provisions of the Section 203. § of the Act on Taxation on prolongation of the elapse time pertaining to the determination of tax, from which it should be highlighted that the lapse period may also be prolonged with 6-12 months.
This includes: tax return, documents serving as bases to the tax returns (M30 form, Data Sheet 201x – upon mid-year exit), documents related to tax reliefs.
- Employee's data necessary for determining social security pension: five (5) years from the date the employee reaches the retirement age.
 - Prevailing rule of law: Section 43. § subsection (2) of the Act LXXXI of 1997 (Act on Pension benefits), according to which the employer may only prove its disagreement with the length of service calculated by the social security state authority with an original document issued by the former employer (certificate) or its attested copy or certificate issued based on the original register of the employer.
As per Section 99/A. § of the Act on Pension benefits the party obliged to keep registers shall reserve the employment documents of its employees, former employees in connection with their insurance relationship containing data on the service period or the salary, income to be taken into account when determining the pension benefit **for five years after the insured employee, former employee reach the retirement age**.
This includes the documents necessary for determining the income being the basis of the benefit and the service time: documents certifying the payment of salary and sick leave/maternity leave allowances subject to contribution payment (certificates issued on income subject o social security contribution payment, exit documents, certificate of employment, documents reporting start and end date of employment).

- Rules on reserving in archives: document which cannot be scrapped.
 - According to Section 4. § of the Act LXVI of 1995 on the public archives and the protection of the materials of private archives (Act on Archives) the organs disposing of archives (...) shall ensure the protection of documents of enduring value in their ownership or possession. This results that such documents cannot be scrapped.
As per Section 3. § point j) of the Act on Archives “documents of enduring value” shall mean documents material from economic, social, political, legal, defence, national security, scientific, cultural, technical or from other aspects, inevitable for searching, understanding the historic past, the continuous provision of public duties and citizen rights, containing data which cannot or only partially can be accessible from other sources. In consideration thereof any such document containing employee's data which do not meet the above categories (to enforce the above purposes), but on the other hand may serve as grounds for enforcing any citizen rights of the employee cannot be scrapped, and- in the lack of other regulation – shall be preserved by the Employer without any limitation in time.

Summarising the documents affected by the above legal rules in a table:

Category	Archives	Determining Pension	Determining Tax	Employment relationship
----------	----------	---------------------	-----------------	-------------------------

Retention time	Cannot be scrapped	Retirement age + 5 years	Return + 5 years (in certain cases 6 years)	Termination of employment + 3 years (in certain cases 5 years)
Document	Documents of enduring value	documents necessary for determining the amount of salary subject to social security contribution and service period, documents verifying payment of salary subject to social security contribution and sick allowance (certificate issued on the salary subject to social security contribution and deducted contributions, exit documents, certificate of employment, forms of reports on commencement and end of employment)	tax return, documents serving basis for tax returns (M30 for, data sheet 201x) documents related to tax reliefs	<ul style="list-style-type: none"> - employment contract - study contract, - termination notice, - instruction, - undertaking, - rules of employer - notification

c.) In case of Temporary Agency Worker the subject Employer or its agent process personal data for the above defined purposes during the term of the placement agreement, and for 5 years after the termination of the placement agreement

The processed personal data shall be erased immediately if the data processing did not take place for the purposes defined by law or the processing purpose has ceased to exist.

The data processed based on the consent of the Data Subject shall also be erased upon such request received from the Data Subject.

d.) In consideration of Section 23. § subsection (7) of the Act CXCI of 2011 the Employer employing an employee with reduced ability to work shall preserve the register kept for the purpose to determine the rehabilitation benefit for 5 years after the end of the employment

The duration of the data processing under this Policy are included in the table under Section 12.

8. Data security

Data Controller shall inform its Employees about the processing of their personal data. The subject Employer shall only disclose any facts, data, opinion pertaining to its Employees with third parties if prescribed by law or consented by the Employee.

Data Controller undertakes to ensure the protection of the personal data processed by Data Controller.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, Data Controller shall implement appropriate technical and organisational measures and implement the procedures which ensure that the recorded, stored and processed data are protected, furthermore hinder the destroy, the unauthorized use and change of the data.

Data Controller obliges himself that it will call all third parties to whom Data Controller lawfully forwards or hands over data to comply with the requirements of data security.

Data Controller shall do its best to protect the personal data it processes against unauthorized access, transformation, disclosure, deletion or destruction, accidental destruction or damage. The processed data may only be accessed by the Data Controller, its employees and the data processors deployed by the Data Controller as per access levels. Data Controller shall not hand over the data to third persons not having right to access. The employees of the Data Controller and Data Processor shall only have access to the personal data as per scope of job, specific manner and access levels defined by the Data Controller and the Data Processor.

Data Controller for the sake of security of the IT systems shall protect its IT systems with firewall, and in order to prevent external and internal data loss use virus screens. Data Controller has also arranged for the control of all forms of incoming and outgoing communication for the sake of preventing misuse.

Data Controller and Data Processor qualifies and handles the personal data as confidential data. For the protection of the data files stored electronically in different registers Data Controller ensures that the data stored in the registers – save for the exceptions defined by law – could not be directly connected to the Data Subject.

Data Controller shall ensure a level of data security appropriate to the risk, including among others, in certain cases:

- the pseudonymisation and encryption of personal data,
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services used for the processing of personal data (operation- and development security, protection against intrusion and detection, prevention of unauthorized access),
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident (prevention of data leak, handling vulnerability and incidents),
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing (maintaining business continuity, protection against harmful codes, safe storage, forwarding, processing of data, safety training of employees).

When determining the proper level of security expressly such risks arising from the data processing shall be taken into account which result especially from the incidental or unlawful destruction, loss, modification, disclosure or unauthorized access to the personal data forwarded, stored or otherwise processed.

9. Recipients

a) Other independent Data Controller

MVM Zrt. as the controlling company of the MVM Company Group processes as an independent data controller the personal data of the Employees of any members of the MVM Company Group (including the data controller member companies listed in Annex 1 of this Policy) based on its legitimate interest.

The controlling member of the MVM Company Group and the Data Controllers being part of the company group as per Section (48) of the preamble of the GDPR may have legitimate interest that for internal administrative purposes within the company group they can forward personal data, including the personal data of employees also.

Other independent Data Controller name, registered seat	Activity performed by other independent Data Controller	Personal data processed by the other independent Data Controller
MVM Energetikai Zártkörűen Működő Részvénytársaság, MVM Zrt. 1031 Budapest, Szentendrei út 207-209.	Attending group level HR	All personal data processed by the Data Controller also and necessary to perform the group level HR services

b) Data Processors

Data processor is such natural person or legal entity which processes personal data on behalf of the Data Controller.

In connection with the personal data of the Employees the following companies, persons proceed as data processors (**Data Processor**):

Data Processor name, registered seat	Activity performed by the Data Processor	Personal data processed by the Data Processor
MVM Services Zrt. 1023 Budapest, Árpád fejedelem útja 26-28.	Based on a service agreement (SLA) attending HR activities for other Data Controller group member company	All personal data also processed by the Data Controller which is necessary for HR activities defined in the SLA contract
School for Executive Education and Development Nonprofit Zrt. SEED Zrt. 1061 Budapest, Andrásy út 20. II/4.	Organising trainings	name, scope of job, group member company, organization unit, email address, place of work, telephone number
DUNAGÁZ Zrt., 2510 Dorog, Bécsi út 1/a	Organising trainings	name, scope of job, group member company, organization unit, email address, place of work, telephone number
Magyar Elektrotechnikai Egyesület (MEE) 1075 Budapest, Madách Imre út 5.	Organising trainings	name, scope of job, group member company, organization unit, email address, place of work, telephone number
DEKRA Akademié Kft., 1012 Budapest, Vérmező út 4.	Organising trainings	name, scope of job, group member company, organization unit, email address, place of work, telephone number
5S Consulting and Training Kft. 1119 Budapest, Hadak útja 40.	Competency and operation development	name, scope of job, group member company, organization unit,
Atrois Training & Consulting Kft. 1025 Budapest, Csatárka köz 8.	Competency and operation development	email address, place of work, telephone number
Business Coach Kft. 1068 Budapest, Városligeti fasor 32. I. em. 2.	Competency and operation development	name, scope of job, group member company, organization unit,
Develor Tanácsadó Zrt. 1074 Budapest, Rákóczi út 70-72.	Competency and operation development	email address, place of work, telephone number
FLOW Consulting Kft. 1146 Budapest, Zichy Géza utca 5.	Competency and operation development	name, scope of job, group member company, organization unit,
Jagall és Társai Kft 1111 Budapest, Bicskey utca 3-5.	Competency and operation development	email address, place of work, telephone number
Legacy Kft. 1132 Budapest, Váci út 8. 1/17	Competency and operation development	name, scope of job, group member company, organization unit,,
SHL Hungary Kft. 2040 Budaörs, Kossuth Lajos utca 20.	Competency and operation development	email address, place of work, telephone number
Simonyi és Tóth Kft. 1015 Budapest, Szabó Ilonka utca 71/a	Competency and operation development	name, scope of job, group member company, organization unit,
Valoro Consulting Kft. 1123 Budapest, Alkotás utca 17-19.	Competency and operation development	email address, place of work, telephone number
GT Mentor Group Integrált Vezetésfejlesztési Kft. 1114 Budapest, Bartók Béla 15/B 4. em 10.	Competency and operation development	name, scope of job, group member company, organization unit,

MATT Humán Tanácsadó Kft. 1222 Budapest, Kertész utca 16/B	Competency and operation development	email address, place of work, telephone number
Concordia Szervezet és Vezetésfejlesztési Kft. 1031 Budapest, Szentendrei út 164.	Competency and operation development	name, scope of job, group member company, organization unit,
PentaSchool Bt. 1051 Budapest, Sas utca 25.	Training	email address, place of work, telephone number
Grow Szervezetfejlesztési Tanácsadó Zrt. 1037 Budapest, Montevideo u. 3/a.	Competency and operation development	name, scope of job, group member company, organization unit,
Grow Szervezetfejlesztési Tanácsadó Zrt. 1037 Budapest, Montevideo u. 3/a.	Realization of group level operative management development and duties of organisational development, change management	name, scope of job, group member company, Direct superior, Email of direct superior, supervise executives, organization unit, email address, place of work, telephone number
FLOW Consulting Kft. 1146 Budapest, Zichy Géza utca 5.	Realization of group level middle management development and talent pool reinforcement program	name, scope of job, group member company, Direct superior, Email of direct superior, supervise executives, organization unit, email address, place of work, telephone number
OD Partner Szervezetfejlesztő és Vezetésfejlesztő Kft., 1142 Budapest, Rákospatak u. 82.	Training, coaching, advisory	name
Enetha Learning Kft., 2314 Halásztelek, Hajnal utca 29	Training, coaching, advisory	name
Art of progres Kft. 1092 Budapest, Ráday u. 15.	Training, coaching, advisory	name
EQ Skills Tanácsadó és Vezetőfejlesztő Kft., 1022 Budapest, Bimbó út 5.	Skill upgrading, Training, coaching, advisory	name
Profiles International Hungary Kft. 1137 Budapest, Pozsonyi út 24.	Online questionnaire, coaching, advisory	name, private email address
freQuest Kft.	Storage of data processed by online questionnaire editing-, recording- and online panel management systems	name, scope of job, group member company, organization unit, email address, place of work, telephone number, name of child under the age of 16
Sensa Consulting Kft. 1028 Budapest, Harmatcsepp u. 53.	Skill upgrading, Training, coaching, advisory	name, place of work, telephone number email address
MVM NÜSZ Zrt. 7030 Paks, Gagarin u.1.	Attending operative HR service tasks (e.g. storage of data in connection with employment, pay roll, work time register, vacation requests, preparation of returns and performance of deductions prescribed by law)	Name, Birth name, Birth place, Birth date, Mother's maiden name, Address, Residence (if other than address), Tax identification number, Social security number (TAJ), Pensioner number (in case of pensioner employees), ID card number, Address card ID number, Bank account number, Copy of the document verifying qualification, Salary, Scope of job, Work time, Work order, Work place, Fact of probation period, Data on education, professional qualification, Data on professional experience, Data on sick leave and vacation time, Name, birth place and date of child under the age of 16 (if extra vacation time is requested in respect of the child),

		<p>Photo (only if consented), definite or indefinite term of the contract.</p> <p>Starting date of employment/relationship, Starting date of recognised industry legal relationship, Name of employer, Organization unit, Work place email address and telephone number</p> <p>Data on Voluntary Pension Fund membership, Mutual societies and health fund data, Bank account number, Former employer's certificate, other remuneration, extract from judicial record, if mails are requested to private email the private email address, curriculum vitae, HAY level, spoken languages, professional competency.</p> <p>Upon supporting purchase of real estate the data of the real estate, the acquisition of ownership and the loan taken out from financial institution to acquire ownership,</p> <p>Data required to count tax and social security contributions, Tax identification number, Citizenship, Bank account number, Classification category, Company car allowance, Company mobile use, Signature right, Address data, Health-insurance card, Individual tax number</p> <p>Direct superior, FEOR-number standard, Driving licence number</p> <p>Date of exit, Reason of exit, Exiting documents (from former work place)</p> <p>Awards, scope of job entitling to age benefit, cots payer</p> <p>Direct payment orders, deductions, data required for deductions, data on reduced capacity to work, Safety classification of scope of job, Nature of work order (fix/flexible), Work order rules</p> <p>Data on use of own vehicle/self-owned vehicle's data, Data on study contract, Data of debt, Timeframe of absence from work, Performance valuation data, Id number, Passport number, Work place health/Occupation-health fitness data</p>
<p>MVMI Zrt. 7030 Paks, Vasút u. 1.</p>	<p>Ensuring IT support to attending operative HR service tasks (e.g. storage of data in connection with employment, pay roll, work time register, vacation requests, preparation of returns and performance of deductions prescribed by law)</p>	<p>Name, Birth name, Birth place, Birth date, Mother's maiden name, Address, Residence (if other than address), Tax identification number, Social security number (TAJ), Pensioner number (in case of pensioner employees), ID card number, Address card ID number, Bank account number, Copy of the document verifying qualification, Salary, Scope of job, Work time, Work order, Work place, Fact of probation period, Data on education, professional qualification, Data on professional experience, Data on sick leave and vacation time, Name, birth place and date of child under the age of 16</p>

		<p>(if extra vacation time is requested in respect of the child), Photo (only if consented), definite or indefinite term of the contract.</p> <p>Starting date of employment/relationship, Starting date of recognised industry legal relationship, Name of employer, Organization unit, Work place email address and telephone number</p> <p>Data on Voluntary Pension Fund membership, Mutual societies and health fund data, Bank account number, Former employer's certificate, other remuneration, extract from judicial record, if mails are requested to private email the private email address, curriculum vitae, HAY level, spoken languages, professional competency.</p> <p>Upon supporting purchase of real estate the data of the real estate, the acquisition of ownership and the loan taken out from financial institution to acquire ownership,</p> <p>Data required to count tax and social security contributions, Tax identification number, Taxes, Tax number, Citizenship, Bank account number, Classification category, Company car allowance, Company mobile use, Signature right, Address data, Health-insurance card, Individual tax number</p> <p>Direct superior, FEOR-number standard, Driving licence number</p> <p>Awards, scope of job entitling to age benefit, cots payer</p> <p>Direct payment orders, deductions, data required for deductions, data on reduced capacity to work, Safety classification of scope of job, Nature of work order (fix/flexible), Work order rules</p> <p>Data on use of own vehicle/self-owned vehicle's data, Data on study contract, Data of debt, Timeframe of absence from work, Performance valuation data, Id number, Passport number, Workplace health/Occupation-health fitness data</p>
<p>SHL Hungary Kft. 2040 Budaörs, Kossuth Lajos u. 20.</p>	<p>Measuring personality and competency to support recruitment process, management and employee skill enhancing</p>	<p>Name, email address, result of the assessment</p>
<p>BCS Business Consulting Services Tanácsadó, Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság 1118 Budapest, Rétköz u. 5.</p>	<p>Performance and realization of the tasks of "supporting SAP Success Factors components" in case the following modules: Platform & Jam Performance & Goals Compensation Learning Succession & Development</p>	<p>Status, ID number, Title, Family name, Forename, Direct superior, HR supporter, Group member company, Board of Directors, Unit, Group, Paying employee, Region, Starting date of relationship, Starting date of legally continuous term, Email address, Mobile number, fixed telephone number and extension number, classification category, Position, Engagement, Validity starting date of engagement, End of engagement, Daily hour limit, Scope of job, Validity starting</p>

	Support of SAP SuccessFactors components after going live, during the use of the functions, providing help in solving possible questions, problems, Later when introducing new modules the support of those after going live supporting the use of the functions, providing help in solving possible questions, problems.	date of the scope of job, Code of the scope of job, HAY level, Entitlement to wage increase, Entitlement to bonus, Classification salary, Engagement fee, Other supplementary remuneration, Performance salary, Country, Time zone, Language, Method of log in.
Nexum Magyarország Kft. 6726 Szeged, Temesvári krt. 15.	Operating carrier portal	In connection with the job application: Name, availability (email, telephone) of the subject external third person, qualification, birth date, all personal data necessary to perform services, such as documents required for the application, e.g. motivation letter. Employee: id number, name, birth date (when entering internal job portal data necessary for identification). In connection with recommendation by co-worker: id number, name, birth date (data necessary for the identification of the recommending employee).
Mind-diák Iskolai Szövetkezet 1074 Budapest, Dohány u. 27.	Processing of personal data in relation to attending contractual duties (e.g. archiving, administration, etc.)	name, telephone number, email address, tax number, work time data
Prodiák Iskolaszövetkezet 8000 Székesfehérvár, Szabadság- harcos út 57.	Processing of personal data in relation to attending contractual duties (e.g. archiving, administration, etc.)	name, telephone number, email address, tax number, work time data

The Data Processors are entitled to process the above personal data during the term of their agreement with the Data Controller, or in case of an existing agreement until the deadlines defined under section 7 and 12.

10. The rights in connection with data processing and possibility of enforcement of rights and legal remedy

10.1. Rights in connection with data processing

The Data Subject may request from Data Controller the followings:

- to receive information about the facts pertaining to the data processing (before the start of the data processing or during processing),
- access to their personal data (provision of their personal data by Data Controller),
- to have their personal data rectified, or amended,
- save for the cases of compulsory data processing to have the processing of their personal data limited or to have their personal data deleted,
- right to data portability,
- may object against processing their personal data.

10.1.1. Right to information (based on Article 13-14 of the General Data Protection Regulation)

Data Subjects on the availabilities defined under section 10.2 may request information from Data Controller that:

- which personal data,
- under what legal grounds,
- for what purpose,
- from which sources
- for what duration are processed,
- are any data processors deployed, if yes their name, address and activity in relation to the data processing,
- to whom the Data Controller ensured access to or forwarded personal data, when and under what legal regulation,
- the circumstances, impact and the countermeasures taken related to any personal data breach,

Data Controller shall perform the Data Subject's request within one month by e-mail, letter sent to the availability provided by the Data Subject.

10.1.2. Right to access (based on Article 15 of the General Data Protection Regulation)

Data Subject is entitled to receive response from Data Controller regarding whether the Data Subject's personal data are processed by Data Controller and if personal data of the Data Subject are processed get access to their personal data subject to processing.

Data Controller will provide copy of the personal data undergoing processing to the Data Subject if that is not prohibited by law. If Data Subject has submitted its request by electronic means, then the information shall be provided to the Data Subject in a commonly used electronic form unless otherwise requested by the Data Subject.

10.1.3. Right to rectification, supplementation (based on Article 16 of the General Data Protection Regulation)

Through the availabilities defined undersection 10.2 the Data Subject may request in writing from Data Controller to modify any of his/her personal data (for example may change his/her e-mail address or post address or request rectification any of his/her inaccurate personal data). Considering the purpose of the data processing the Data Subject is entitled to request from the Data Controller the supplementation of any of his/her incomplete personal data undergoing processing.

Data Controller shall perform the Data Subject's request within one month and shall inform Data Subject thereof by e-mail, letter sent to the availability provided by the Data Subject.

10.1.4. Right to erasure (based on Article 17 of the General Data Protection Regulation)

Through the availabilities defined undersection 10.2 the Data Subject may request in writing from Data Controller the erasure of his/her personal data.

Primarily the erasure of personal data may be requested if our data processing is based on your consent, in such an event we erase the personal data. If you have provided us your personal data for the purpose to establish and perform an employment contract then the related processing of these personal data will not automatically cease with the termination of the contract and we cannot perform your request for erasure. In such event we have to process the personal data of the Data Subject as defined by law further on even after the termination of contract until the duration defined in Section 7 of this Privacy Policy.

If no such obligation exist then the Data Controller shall perform the Data Subject's request within one month and shall inform Data Subject thereof in a letter sent to his/her availabilities provided for this purpose by the Data Subject.

10.1.5. Right to restriction of processing (based on Article 18 of the General Data Protection Regulation)

Through the availabilities defined under section 10.2 the Data Subject may request in writing from Data Controller the restriction of processing of his/her personal data (by clearly indicating the restricted nature of data processing and ensuring processing separated from other data). The restriction shall last until the reason determined by Data Subject makes the storage of the data necessary.

Restriction of data may be requested by the Data Subject for example if he/she thinks that his/her data has been processed by the Data Controller unlawfully, but it is necessary that the data should not be erased for the purpose of any court or administrative procedures initiated by the Data Subject.

In such cases until the notification of the authority or the court the Data Controller maintains the storage of the personal data which it only erases thereafter.

10.1.6. Right to data portability (based on Article 20 of the General Data Protection Regulation)

Through the availabilities defined under section 10.2 the Data Subject may request in writing from Data Controller to receive the personal data concerning him/her, which he or she has provided to the Data Controller in a structured and commonly used and machine-readable format and forward these data to another data controller without hindrance from the Data Controller, if

- the data processing is based on consent pursuant to point a) of Article 6 (1) or point a) of Article 9 (2) of the General Data Protection Regulation, or
- based on agreement as per Article 6 Section (1) point b); and
- the data processing is carried out by automatic means.

10.1.7. Right to objection (based on Article 21 of the General Data Protection Regulation)

Through the availabilities defined under section 10.2 the Data Subject may object in writing the processing of his/her personal data pursuant to point f) Article 6 (1) of the General Data Protection Regulation required for the enforcement of rightful interest of the Data Controller or a third party, including profiling based on those provisions. In such event Data Controller shall not further process the personal data, except if the Data Controller demonstrates compelling legitimate grounds for processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

10.2. Enforcement of rights, legal remedies in connection with data processing

Contacting the Data Controller

Should you have any question, doubt or wish to request information about your personal data processed by the relevant Employer or its data processor you may turn to the competent employee at the Employer's HR, the data protection officer or the internal data protection representatives of the Employer.

The name and availabilities of the data protection officers and the internal data protection representatives of the Employers are listed in Annex 1 of this Policy.

Upon exercising any rights of the Data Subject according to section 10.1, request for information on data processing, or objection or complaint against the data processing the Data Controller without undue delay within the deadline defined by current legal regulations shall examine the case, take measures in connection with the request and provide information to the Data Subject. If required considering the complexity and number of requests this deadline may be extended according to law.

If Data Subject has submitted its request by electronic means, then the information shall be provided to the Data Subject in a commonly used electronic form unless otherwise requested by the Data Subject. Should the Data Controller fail to take measures without delay based on the request by the Data Subject at the latest within the deadline defined by law then it shall inform the Data Subject about the reason of the lack of measures, the reasons of denying the request and that the Data Subject may initiate a court or other administrative out of court procedure as follows.

Initiating a court procedure

The Data Subject may initiate a lawsuit against the Data Controller or against the data processor (if any) – in relation to the data processing falling within the activities of the data processor -, if in his/her view the Data Controller or the data processor engaged by Data Controller processes his/her personal data by the breach of the provisions of the legal regulation or the compulsory legal rules of the European Union on processing personal data. The lawsuit shall fall within the competence of the regional court (törvényszék). The lawsuit – as per the choice of the Data Subject - can also be initiated before the regional court having competence based on the home address or the residence address of the Data Subject.

The relevant Employer will compensate the damages caused by the unlawful processing of the Employee's data or the breach of the data security requirements, but will be exempted under liability if the damage was due to unavoidable external reason outside the scope of the data processing. The relevant Employer will not compensate damages to the extent which it is a result of the wilful act or gross negligence of the party suffering damage.

Initiating administrative procedure of the supervisory authority

The Data Subject is entitled to request an investigation procedure or the conduction of an administrative procedure from the Hungarian National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa u. 9-11., post address: 1363 Budapest, Pf. 9., telephone: +36-1-391-1400, fax: +36-1-391-1410, e-mail: ugyfelszolgalat@naih.hu) in order to enforce his/her rights with reference to the fact that infringement has occurred in connection with the processing of his/her personal data or the direct threat of such infringement occurred, such as in particular:

- according to the Data Subject's opinion the Data Controller restricts the exercising of the rights of the Data Subject defined under Section 10.1 or rejects the request of the Data Subject regarding the enforcement of such rights (initiation of an examination), or
- in view of the Data Subject during the processing of his/her personal data the Data Controller or the data processor engaged by the Data Controller infringe the provisions of law or the compulsory legal regulations of the European Union pertaining to data processing (request for conducting an administrative procedure).

11. Encumbrances

- a.) During the processing of the personal data described in this Privacy Policy save for the cases specifically defined under Sections 3/a. and 3/b of this Policy automated individual decision-making, profiling, forwarding of personal data to third countries or international organisations does not take place.
- b.) This Privacy Policy can be found at <http://www.mvmnext.hu> website and the intranet of the Employers.
- c.) Data Controller reserves the right to unilaterally amend this Privacy Policy for the future. Data Controller will notify the Data Subjects of the amendments on its website and through the Intranet.
- d.) **Relationship of this General Privacy Policy for Employees and other privacy policies applied by the Data Controllers/Employers**
 - da.) The Employers provide information on the rules of applying work safety camera systems, electronic entrance system and remote integrated intrusion alert systems (remote surveillance) operating at the registered seat, premises, branch offices, customer service offices of the relevant Employer.

The supplementing Policy on such special data processing shall form an annex of the present Privacy Policy, and shall be an inseparable part of it. For questions not or not completely regulated in the Policy of such special data processing the terms of the present Privacy Policy shall be applied.

- db.) The Employers may also issue other supplementing Privacy Policies on processing the personal data of its Employees for further special purposes not defined in the present Privacy Policy.

These supplementing Privacy Policies on such special data processing shall form an annex of the present Privacy Policy, and shall be an inseparable part of it. For questions not or not completely regulated in those Policies of such special data processing the terms of the present Privacy Policy shall be applied.

12. Detailed description of the data processing

Purpose of the data processing	Processed personal data	Duration of the data processing	Legal grounds of the data processing	Data source	Persons having access to the data External recipients (pls see section 6 also!) External recipients (if any)	Purpose of disclosure (if there is a recipient)
Processing, storage and erasure of the data for the purpose of hiring work force, preparing offer, preparation of employment agreement, plus attending related group level HR tasks	Name, Birth place, Birth date, Mother's name, Address, Education, Qualification, Professional experience, other data in the Curriculum vitae relevant for filling the job, Former employers, scope of jobs, Social security number, Tax identification number, E-mail, Telephone number, Identification number of personal and qualification documents, For jobs defined by law or the Employer existence of the extract of clean penalty record	Making the decision on the establishment of the employment relationship, upon consenting further processing of data maximum 12 month In case of withdrawal of consent the date of withdrawal	Consent of the Data Subject For attending group level HR: Legitimate interest. As per section (48) of the preamble of the GDPR data controllers being part of a company group may have legitimate interest in transmitting personal data within the company group for internal administrative purposes, including the processing of the personal data of the employees	Applicant, future/potential employee	MVM Zrt. MVMI Zrt. MVM NÜSZ Zrt. MVM Services Zrt. Data Processors taking part in work force recruitment, hiring.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller Provision of administrative services for the Data Controller Performing HR tasks under service contract Supporting work force recruitment, hiring
During recruitment and use of carrier-portal processing, storage and erasure of data provided by the applicant, plus attending related group level HR tasks	Name, Birth place, Birth date, Mother's name, Address, Education, Qualification, Professional experience, Former employers, Starting date of recognised industry legal relationship, Scope of jobs, Email, Telephone number	Until withdrawal of consent, in the lack of withdrawal until 12 months from the date of the application or the establishment of the employment relationship	Consent of the Data Subject For attending group level HR: Legitimate interest.	Applicant, future/potential employee	MVM Zrt. MVMI Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller

					MVM NÜSZ Zrt. MVM Services Zrt. Data Processors taking part in work force recruitment, hiring.	Provision of administrative services for the Data Controller Performing HR tasks under service contract Supporting work force recruitment, hiring
Management of recruitment, registration, storage and erasure of CVs, plus attending related group level HR tasks	Name, Birth place, Birth date, Mother's name, Address, Education, Qualification, Professional experience, Work experience, Existence of driving licence, Scope of interest, Former employers, Starting date of recognised industry legal relationship, Scope of jobs, Email, Telephone number	Until withdrawal of consent, in the lack of withdrawal until 12 months from the date of the application or the establishment of the employment relationship	Consent of the Data Subject For attending group level HR: Legitimate interest.	Applicant, future / potential employee	MVM Zrt. MVM Zrt. MVM NÜSZ Zrt. MVM Services Zrt. External Data Processors taking part in work force recruitment, hiring.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller Provision of administrative services for the Data Controller Performing HR tasks under service contract for the sake of attending HR duties within the Company Group Supporting work force recruitment, hiring
Recording, processing, storage, forwarding and erasure of data for the purpose of preparing,	Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number,	Upon consent until withdrawal of consent	Consent of the Data Subject, later after the relationship is concluded	Directly the Data Subject for the Employer	MVM Zrt.	Controlling Company of the Company Group for the

<p>amending, terminating, registering documents in connection with concluding employment relationship/appointment (e.g. employment agreements) and for the sake of performing the duties of employees falling within his/her scope of job, plus attending related group level HR tasks</p>	<p>Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, HAY level, Salary, Email, Telephone number, Data of children, Social security data, Voluntary Pension Fund membership, Mutual societies and health fund data, Bank account number, Certificate of former employer, Data on education, qualification, HR number</p>	<p>After the employment relationship is established: depending on the unique purpose of the processing until the terms defined under point 7/b.</p>	<p>performance of contract and compliance with legal obligation</p> <p>For attending group level HR: Legitimate interest.</p>	<p>Employer to the member of the Company Group performing group level HR tasks</p>	<p>MVMI Zrt.</p> <p>MVM NÜSZ Zrt.</p> <p>MVM Services Zrt.</p> <p>The external contractual or other partner, the client of the relevant Data Controller employer, or other natural person affected by the activity of the Data Controller, etc (jointly external partners)</p>	<p>purpose of attending group level HR tasks</p> <p>Operation of IT systems used by the Data Controller</p> <p>Provision of administrative services for the Data Controller</p> <p>Performing HR tasks under service contract</p> <p>For the sake to ensure contact and attending the case the name, phone number, email and other availabilities may be provided to the external partner of such employee who is obliged on part of the Employer to keep contact, attend the case, complaint, report, etc., negotiate (all together handle the matter)</p>
<p>Concluding, amending, terminating and performing civil law contracts (Civil Code) aiming the performance of work. For these purposes recording, storage, processing, forwarding, and erasure of data, plus</p>	<p>Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Starting date of the relationship, Employer, Salary, private email address, private telephone number, Social security data, Bank account number</p>	<p>For 5 years after the termination of the legal relationship</p>	<p>Consent of the Data Subject, later after the relationship is concluded</p> <p>performance of contract and compliance with legal obligation</p>	<p>Directly the Data Subject for the Employer</p> <p>Employer to the member of the Company Group performing group level HR tasks</p>	<p>MVM Zrt.</p> <p>MVMI Zrt.</p>	<p>Controlling Company of the Company Group for the purpose of attending group level HR tasks</p> <p>Operation of IT systems used by the Data Controller</p>

attending related group level HR tasks.			For attending group level HR: Legitimate interest.		MVM NÜSZ Zrt. MVM Services Zrt.	Provision of administrative services for the Data Controller Performing HR tasks under service contract
For the purpose to prepare, amend and keep register of the job description and the notification defined by Section 46. § of the Labour Code recording, processing, storage and erasure of data, plus attending related group level HR tasks.	Name, Employer, Scope of job, HAY level	For 3 years after termination of employment relationship	Compliance with legal obligation For attending group level HR: Legitimate interest.	Directly the Data Subject to the Employer Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. MVMI Zrt. MVM NÜSZ Zrt. MVM Services Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller Provision of administrative services for the Data Controller Performing HR tasks under service contract
Managing and keeping register of employee's reports, statement prescribed by law in connection with employment relationships by the employer (e.g. bank account data, other relationship related to employment, other position, etc.) Keeping register of other statements and documents required for appointments	Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, Salary, Email, Telephone number, Data of children (place and date of birth, mother's name, address, tax number, social security number), Social security data, Voluntary Pension Fund membership, Mutual societies	For 3 years after termination of employment relationship For 5 years after termination of other relationship	Compliance with legal obligation For attending group level HR: Legitimate interest.	Directly the Data Subject to the Employer Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. MVMI Zrt. Organ defined by law MVM NÜSZ Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller Transmitting data prescribed by law Provision of administrative

(resolution of owner), plus attending related group level HR tasks.	and health fund data, Bank account number, Certificate of former employer, Data on education, qualification, HR number				MVM Services Zrt.	services for the Data Controller Performing HR tasks under service contract
For the purpose of keeping register of the occupational health examination on fitness for work recording, processing, storage and erasure of data, plus attending related group level HR tasks.	Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Employer, Scope of job, data on occupational health fitness for work	For 3 years after termination of employment relationship	Compliance with legal obligation For attending group level HR: Legitimate interest.	The occupational health service provider to the Employer Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. MVM Zrt. Health service provider (Doktor24 Kft.) MVM Services Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller Occupational health examination on fitness for work Performing HR tasks under service contract
For the purpose of documentation and keeping register of the planning and organising of trainings, carrier planning, orientation and individual trainings recording, processing, storage and erasure of data plus attending related group level HR tasks	In the frame of documenting the trainings: Name, Birth place, Employer, Scope of job, Telephone number, Email address, data on presence, name of the training, data on food allergy. Surplus in the frame of planning trainings: place and date of birth, data on qualification, data on new training.	For 3 years after termination of employment relationship	Performance of contract Upon orientation trainings for attending group level HR: Legitimate interest. Upon individual training: consent of the Data Subject	Directly the Data Subject to the Employer Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. As per programs the different partners who provide the training and its contact person: School for Executive Education and Development Nonprofit Zrt. SEED Zrt. DUNAGÁZ Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Ensuring training services

					<p>DEKRA Kft. MEE 5S Consulting and Training Kft. Atrois Training & Consulting Kft. Business Coach Kft. Develor Tanácsadó Zrt. FLOW Consulting Kft. Jagall és Társai Kft Legacy Kft. SHL Hungary Kft. Simonyi és Tóth Kft. Kiss István private entrepreneur (independent data controller) Valoro Consulting Kft. GT Mentor Group Integrált Vezetésfejlesztési Kft. MATT Humán Tanácsadó Kft. Concordia Szervezet és Vezetésfejlesztési Kft. PentaSchool Bt. Grow Szervezetfejlesztési Tanácsadó Zrt. FLOW Consulting Kft. freQuest Kft. Sensa Consulting Kft.</p> <p>MVMI Zrt.</p>	<p>Operation of IT systems used by the Data Controller</p>
--	--	--	--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------

					MVM Services Zrt.	Performing HR tasks under service contract
For the purpose to operate performance evaluation and recognition systems the recording, processing, storage and erasure of data of the Data Subject and data pertaining to the Data Subject, plus attending related group level HR tasks	Name, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, HAY level, Salary, valuation of compliance with performance and competency goals	For 3 years after termination of employment relationship	Compliance with legal obligation, performance of contract For attending group level HR: Legitimate interest.	Directly the Data Subject to the Employer Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. SAP Hungary Kft., BCS BUSINESS CONSULTING SERVICES KFT. MVM NÜSZ Zrt. MVMI Zrt. MVM Services Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of performance evaluating IT system in cloud Provision of administrative services for the Data Controller Operation of IT systems used by the Data Controller Performing HR tasks under service contract
Upon suspicion of the breach of obligations arising from the employment relationship or other relationship (e.g. ethical standards) conducting the examination, and upon breach of obligation applying legal consequences, enforcing rights of the employer/principal.	Name, Employer, Scope of job/position, HAY level, Email address, Telephone number, Behaviour and activity in relation to the complaint. Date of starting and finishing the procedure. Name of the action giving reason to the procedure; The ethical offence established by the procedure, the legal consequence	Until the termination of the employment- or other relationship, or closure of the procedure, unless as a result of the procedure a disciplinary-, administrative- or court procedure is initiated against the Data Subject. For the keeping of data during the	In case of the reporting person his/her consent as Data Subject; In case of the individual affected by the report: Legitimate interest; For attending group level HR: Legitimate interest.	Reporting party or directly the Data Subject	MVMI Zrt. MVM BSZK Zrt. MVM Services Zrt.	Operation of IT systems used by the Data Controller Operation of IT systems used by the Data Controller Performing HR tasks under service contract

		administrative- or court procedure aiming the imposing of detrimental legal consequences the provisions of the pertaining rules of law shall be applied.				
In the frame of accounting with the salary and related data reports recording, processing, storage and erasure of data, plus attending related group level HR tasks	<p>Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, HAY level, Salary, Email, Telephone number,</p> <p>Data of children of the employee, Social security data, Voluntary Pension Fund membership, Mutual societies and health fund data, Bank account number, Certificate of former employer, Data on education, qualification, If there is order to transfer trade union membership fee: trade union membership</p> <p>In case of remuneration in recognition of career personal data indicated in the resolution of the pension insurance organization certifying the 40-year employment required for the women preferential old age pension (name, birth name,</p>	<p>For 3 years after termination of employment relationship</p> <p>Date of withdrawal of consent</p>	<p>Performance of contract, Compliance with legal obligation in the vents listed below the consent of the Data Subject</p> <p>Trade union membership, data of children: Consent of the Data Subject</p> <p>In case of monthly data transmissions on the trade union membership fee payments: Legitimate interest (the legitimate interest of the trade union as third party);</p> <p>For attending group level HR: Legitimate interest.</p> <p>In case of remuneration in recognition of career: Consent of the Data Subject</p>	<p>Directly the Data Subject, or if there is transfer order of trade union membership fee the Data Subject or other data controller, the trade union</p> <p>Employer to the member of the Company Group performing group level HR tasks</p>	<p>Financial institution keeping the bank account of the Data Subject</p> <p>MVM NÜSZ Zrt.</p> <p>MVMI Zrt.</p> <p>MVM Services Zrt.</p> <p>Trade Union</p>	<p>Transferring salary, remuneration to bank account</p> <p>Provision of administrative services for the Data Controller</p> <p>Operation of IT systems used by the Data Controller</p> <p>Performing HR tasks under service contract</p> <p>If there is transfer of trade union membership fee: transmitting data on the payment of the trade union membership fees for the sake of ensuring transparency</p>

	<p>mother's name, place and date of birth, social security number, address, data on time of employment, data on women preferential pension such as time of employment, recognizable work days, etc.)</p> <p>Allowance subsidy payable upon employee's request The data indicated on the request form of the subject allowance, subsidy (e.g. name, id number, tax identification number, place and date of birth, mother's name, fact of raising children under the age of 14, etc.) and/or special category of health data (e.g. fact of changed working conditions, care for permanently sick relative justified by practitioner), and personal data, special category of health data indicated on the documents to be enclosed to the request.</p>	Date of withdrawal of consent	<p>until the payment of the remuneration</p> <p>Until the payment of the allowance, subsidy the Consent of the Data Subject, in case of special category health data as per Article 9 subsection (2) point a.) specific consent of the Data Subject</p>			
<p>For the purpose to report to the Tax Authority, the Social Security Organisation data reports, statistical data reports, other official data transmission and registration pertaining to employment relationship the recording, processing, storage and erasure of data</p>	<p>Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, Salary, Email, Telephone number, Data of children (name, birth date, social security number, disability), Social security data, Voluntary Pension Fund membership, Mutual societies and health</p>	<p>End of the statutory limitation period (generally for 5 years) after the end of the tax year</p>	<p>Compliance with legal obligation</p>	<p>Directly the Data Subject or the registers kept by the Data Controller</p>	<p>MVMI Zrt.</p> <p>MVM NÜSZ Zrt.</p> <p>MVM Services Zrt.</p>	<p>Operation of IT systems used by the Data Controller</p> <p>Provision of administrative services for the Data Controller</p> <p>Performing HR tasks under service contract</p>

	fund data, Bank account number, Certificate of former employer, Data on education, qualification					
For the purpose to establish extra vacation time due for having a child, or upon birth of a child, entitlement to family tax reduction, registration of sick leave allowance for caring for a sick child, establishing benefits in connection with the birth of a child recording, processing, storage and erasure of data	Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, Salary, Email address, Telephone number, Data of children (birth date and place, mother's name, address, tax number, social security number), Social security data, Voluntary Pension Fund membership, Mutual societies and health fund data, Bank account number, Certificate of former employer, Data on education, qualification, Maternity	End of the statutory limitation period (generally for 8 years) after the creation of the document	Compliance with legal obligation	Directly the Data Subject	MVMI Zrt. MVM NÜSZ Zrt. MVM Services Zrt.	Operation of IT systems used by the Data Controller Provision of administrative services for the Data Controller Performing HR tasks under service contract
For the purpose of performing the data reporting and verification obligations prescribed for employer by the legislation on social security pension (presently subsection (2) of Section 43. § of the Act LXXXI of 1997) storage of data and upon request forwarding to the beneficiary	Data in connection with the managing of the employment agreement, data in connection with accounting with salary, data in connection with work time register	five years after reaching the pension age prevailing the insured person or the formerly insured person	Compliance with legal obligation For attending group level HR: Legitimate interest.	Directly the Data Subject or the registers of the Data Controller	MVMI Zrt. MVM NÜSZ Zrt. MVM Services Zrt.	Operation of IT systems used by the Data Controller Provision of administrative services for the Data Controller For the sake of performing HR within the Company Group
For the purpose work time registration (in relation thereto registration of incapacity to work) vacation time	Name, Tax identification number, Social Security Identification number, Employer, Scope of job,	For 3 years after termination of employment relationship	Performance of contract and Compliance with legal obligation	Directly the Data Subject	MVM NÜSZ Zrt.	Provision of administrative services for the Data Controller

registration recording, processing, storage and erasure of data	Salary, Data of the employee's children, Social security data		Data of children: Consent of the Data Subject		MVMI Zrt. MVM Services Zrt.	Operation of other IT systems used by the Data Controller Performing HR tasks under service contract
For the purpose to ensure optional remunerations other than salary (VBKJ/cafeteria) recording, processing, storage and erasure of data	Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, HAY level, Salary, Email, Telephone number, Data of children, Social security data, Voluntary Pension Fund membership, Mutual societies and health fund data, Bank account number, Certificate of former employer	For 3 years after termination of employment relationship	Performance of contract and Compliance with legal obligation	Directly the Data Subject	Pensions funds, health funds, SZÉP card service provider, Bank MVM NÜSZ Zrt. MVM Services Zrt. MVMI Zrt.	Payment and administration of optional remuneration other than salary (VBKJ/cafeteria) Provision of administrative services for the Data Controller Performing HR tasks under service contract Operation of other IT systems used by the Data Controller
For the purpose to ensure social and welfare benefits included on the collective bargaining agreement of in other ways by Employer (including the use of the holiday apartments of the MVM Company Group and/or holidays provided by MVM Company Group, plus parking lots on grounds of social reliance, the related data	Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, HAY level, HR number, Salary, Email, Telephone number, Data of children (place and date of birth, mother's name, tax number, social security number), Social security data, Voluntary Pension Fund	For 3 years after termination of employment relationship Date of withdrawal of consent In case of successful tender until the expiry of the parking permit	Performance of contract and Compliance with legal obligation Upon provision of voluntary social and welfare benefits (including holiday apartments, holidays and parking lots on grounds of social reliance): Consent of the Data Subject	Directly the Data Subject Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. Pensions funds, Health funds, health service provider, SZÉP card service provider, Bank	Controlling Company of the Company Group for the purpose of attending group level HR tasks Provision of allowance, administration

<p>processing of the Data Controller in connection with ensuring and tendering these options also) recording, processing, storage and erasure of data, plus attending related group level HR tasks</p>	<p>membership, Mutual societies and health fund data, Bank account, Certificate of former employer, Data on education, qualification, Data of relatives: name tax number, address, family link Data of people spending the holiday together: name, tax number, address</p> <p>Personal data which may be provided voluntarily in the tender for the parking lots on grounds or social reliance: premises where work is performed, distance of the work premises and the permanent residence or the temporary place of living, travel possibilities, data voluntarily given in relation to the applicant's living and family conditions, personal data in the documents enclosed as annex</p>	<p>(during the term of the parking permit), in case of unsuccessful tender until the closure of the tender or until the date of withdrawal of the consent,</p>	<p>For attending group level HR: Legitimate interest.</p>		<p>operator of holiday house, holiday service provider</p> <p>MVM NÜSZ Zrt.</p> <p>MVM Services Zrt.</p> <p>MVMI Zrt.</p> <p>Relevant member company</p>	<p>Provision of administrative services for the Data Controller</p> <p>Performing HR tasks under service contract</p> <p>Operation of other IT systems used by the Data Controller</p> <p>Ensuring social parking lot</p>
<p>Decision on request for employer's loan related to real estate purchase, concluding and keeping register of contract, disbursement of loan, checking repayment, procedure if repayment fails, registering and de-registering mortgage. For the above purposes recording, processing, storage and erasure of data.</p>	<p>Tax identification number, citizenship, Name, Birth place, Birth date, Mother's name, Address, Bank account number, Starting date of employment relationship, Data of child(ren): mother's name, address, name, place of birth, Data of relatives, family link Certificate of former employer, Data on education, number of address ID card, date of termination of employment, Data of real estate owned, Other data of the loan contract</p>	<p>For 5 years after termination of loan agreement related to real estate purchase</p>	<p>Consent of the Data Subject (in scope of preparing contract)</p> <p>Performance of contract</p>	<p>Directly the Data Subject</p>	<p>Financial institutions keeping the Data Subject employee's bank account or conducting loan administration</p> <p>MVM NÜSZ Zrt.</p> <p>MVM Services Zrt.</p>	<p>Performing request, administration</p> <p>Provision of administrative services for the Data Controller</p> <p>Performing HR tasks under service contract</p>

					MVMI Zrt.	Operation of other IT systems used by the Data Controller
<p>For the purpose to perform legal requirements of data reporting arising from general legal succession, change of employer (labour law legal succession) and forms of employment, such as:</p> <ul style="list-style-type: none"> - general legal succession by way of merger, demerger (Sections 3:40-3:47. §§ of the Civil Code), - change in the employer (as per Section 53. § of the Labour Code), - employment at other employer in deviation from the employment contract (as per Section 53. § of the Labour Code), - employment established with more than one employer (as per Section 195. § of the Labour Code) <p>, plus attending related group level HR tasks</p> <p>For the above purposes recording, processing, storage, forwarding and erasure of data , plus</p>	<p>In case of general legal succession and change in the employer: all personal data in connection with the rights and obligations arising from employment relationships, contracts of non-competition and study contracts affected by the transfer</p> <p>In case of employment at other employer and employment established with more than one employer: all such personal data which are required for the rights and obligations of the relevant employer and for the accounting with the other employers</p>	For 3 years after termination of employment relationship	<p>Compliance with legal obligation and/or Performance of contract</p> <p>For attending group level HR: Legitimate interest.</p>	<p>Upon general legal succession the legal predecessor;</p> <p>Upon change in the employer the transferring employer;</p> <p>Upon employment at other employer the employer ordering this or the employer temporarily employing the employee;</p> <p>Upon employment established with more than one employer directly the Data Subject or the employers.</p>	<p>MVM Zrt.</p> <p>relevant companies of the Company Group</p> <p>NÜSZ Zrt.</p> <p>MVMI Zrt.</p> <p>MVM Services Zrt.</p>	<p>Controlling Company of the Company Group for the purpose of attending group level HR tasks</p> <p>Ensuring the reporting of data prescribed by law for the relevant employer Companies within the Company Group for:</p> <ul style="list-style-type: none"> • general legal succession, • changes in the person of the employer, • employment by other employer, • employment established with more than one employer. <p>Provision of administrative services for the Data Controller</p> <p>Operation of IT systems used by the Data Controller</p> <p>Performing HR tasks under service contract</p>

attending related group level HR tasks						
Conducting interview with the exiting employees, for this purpose recording, storage of data	Name, Scope of job, HAY level, Employer, HR number, Starting date of employment, Starting date of recognised industry legal relationship, Date of termination of employment relationship, Method of termination of the employment relationship	For 3 years after termination of employment relationship	Consent of the Data Subject	Directly the Data Subject to the Employer	MVMI Zrt. MVM Services Zrt.	Operation of other IT systems used by the Data Controller Performing HR tasks under service contract
Storage of data processed in connection with the employment relationship after the termination of the employment relationship	Name, Birth place, Birth date, Mother's name, Address, Tax identification number, Social Security Identification number, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Social security data,	Five years after reaching the retirement age pertaining to the insured person	Compliance with legal obligation For attending group level HR: Legitimate interest.	Registers of the Employer Employer to the member of the Company Group performing group level HR tasks	MVM NÜSZ Zrt. MVM Services Zrt. MVMI Zrt.	Provision of administrative services for the Data Controller Performing HR tasks under service contract Operation of other IT systems used by the Data Controller
For the purpose to enforce claims or to defend against claims arising from employment relationship, Employee's loan contracts, civil law legal relationships aiming the performance of work within the statutory limitation period storage, processing, erasure of data and statements, plus full scope storage of data, statements	Name, Birth place, Birth date, Mother's name, Address, Number of ID card and address card. Tax identification number, Social Security number, Data on salary and social security contributions, Data on allowances, Health status, Disability if relevant, Maternity data if relevant, Current employer, Current remuneration, Data of loans, Family status, Personal data of other family members, persons living together with employee (name, mother's name, place	For (generally) 3 years after termination of employment relationship, for (generally) 5 years after termination of civil law relationship, in case of tax elements (generally) 5 years after the end of the tax year	Legitimate interest	Directly the Data Subject and the registers of the Employer	MVM NÜSZ Zrt. MVM Services Zrt. MVMI Zrt. Law firm, organ authorized by law, Bank	Provision of administrative services for the Data Controller Performing HR tasks under service contract Operation of other IT systems used by the Data Controller To pursue the subject procedure (court or land

	and date of birth, social security number, tax number)					registry, employer's loan)
For the purpose of planning, accrual of personal costs analysing difference between plans and facts recording and processing data , plus attending related group level HR tasks	Name, Birth place, Birth date, Starting date of employment, Starting date of recognised industry legal relationship, Employer, Scope of job, HAY level, Salary and other remuneration, Data of children (place and date of birth, mother's name, address, tax number, social security number), Data on leave, Voluntary Pension Fund membership, Mutual societies and health fund data, Data on education, qualification	End of tax year + 5 years	Compliance with legal obligation and Performance of contract For attending group level HR: Legitimate interest.	Directly the Data Subject to the Employer Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. MVMI Zrt. MVM NÜSZ Zrt. MVM Services Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller Provision of administrative services for the Data Controller Performing HR tasks under service contract
Keeping register of resolutions of owner on the election of the executives of the Company Group , plus attending related group level HR tasks	Name, Position, Mother's name, Address, Birth date, Birth place	Until the archiving period applicable based on the nature of the document	Compliance with legal obligation of the owner. For attending group level HR: Legitimate interest.	Directly the Data Subject Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. MVM Services Zrt. MVMI Zrt.	Execution of owner's resolutions For the sake of attending group level HR duties within the Company Group Operation of IT systems used by the Data Controller
Administration in connection with participants for the purpose to attend programs, conferences	Name, Place of work, Position, Birth place, Birth date, ID card number, Telephone number, Email, Address, Data on use of	For 3 years after termination of employment- or other relationship	Professional events, venues, conference, workshops: Legitimate interest;	Directly the Data Subject Employer to the member of the	Moonlight Kft., New Land Media Kft., Lounge Design Kft.	Arranging participation, entrance on site and identification

<p>organized by external partners, plus attending related group level HR tasks</p>	<p>own vehicle / data of own vehicle, Term of leave</p>		<p>Upon voluntary events: Consent of the Data Subject</p> <p>For attending group level HR: Legitimate interest.</p>	<p>Company Group performing group level HR tasks</p>	<p>MVM Zrt.</p> <p>MVMI Zrt.</p> <p>MVM Services Zrt.</p>	<p>Controlling Company of the Company Group for the purpose of attending group level HR tasks</p> <p>Operation of IT systems used by the Data Controller</p> <p>Performing HR tasks under service contract</p>
<p>Managing matters of insurance, settlement of damages, plus attending related group level HR tasks</p>	<p>Name, Mother's name, Birth place, Birth date, Company, and its address, Position, HR number, Availabilities (email telephone number), Data on the insurance offer, insurance policy, claim/damage reporting forms of the insurance company, plus data on the documents to be enclosed to the reporting forms when reporting damages Dat of the protocols on work place accidents, nature of injury Personal data in the statements appointing beneficiary</p>	<p>End of the statutory limitation period (generally for 5 years) after the end of the insurance relationship</p>	<p>Consent of the Data Subject</p> <p>For attending group level HR: Legitimate interest.</p>	<p>Directly the Data Subject</p> <p>Employer to the member of the Company Group performing group level HR tasks</p>	<p>Insurance company, insurance agent, Organ authorized by law</p> <p>MVMI Zrt.</p> <p>MVM Zrt.</p>	<p>Insurance administration and supervision</p> <p>Operation of IT systems used by the Data Controller</p> <p>Controlling Company of the Company Group for the purpose of attending group level HR tasks</p>
<p>For the purpose to ensure availability of employees (executives, etc.) keeping register per organization units, plus attending related group level HR tasks</p>	<p>Name, Position, Availabilities, Address, Telephone number, Email address</p>	<p>For 3 years after termination of employment relationship</p>	<p>For group level cooperation: Legitimate interest.</p> <p>Above basic data: Consent of the Data Subject</p>	<p>Directly the Data Subject to the Employer</p> <p>Employer to the member of the Company Group performing group level HR tasks</p>	<p>MVM Zrt.</p> <p>MVM Services Zrt.</p>	<p>For the sake of ensuring efficient cooperation within the Company Group</p> <p>Performing HR tasks under service contract</p>

					MVMI Zrt.	Operation of IT systems used by the Data Controller
In relation to accounting in harmony with international accounting standards for the purpose to comply with legal requirements storage of statements, plus attending related group level HR tasks	Name, Address, Company Group member involved in the legal relationship, Scope of job registered seat / premises, Organization unit, starting and end date of relationship, Name and family link of close relatives, Interests, position and engagements in other undertakings, plus the nature and extent of their transactions with MVM involvement	Until the archiving period applicable based on the nature of the document	Compliance with legal obligation (IFRS regulation, IAS 24 standard) For attending group level HR: Legitimate interest.	Directly the Data Subject Employer to the member of the Company Group performing group level HR tasks	Organ authorized by law, auditor NÜSZ Zrt. MVMI Zrt. MVM Zrt.	Adminsitration prescribed by law, audit Provision of administrative services for the Data Controller Operation of IT systems used by the Data Controller Controlling Company of the Company Group for the purpose of attending group level HR tasks
Organizing gatherings for pensioners and related administration	Name, Address, Birth place, Birth date, Mother's maiden name, Email address, Facebook address Former employment relationships and positions	Until withdrawal of consent	Consent of the Data Subject	Directly the Data Subject	MVMI Zrt.	Operation of IT systems used by the Data Controller
Organizing summer camps for children and related administration, plus attending related group level HR tasks	Name, Address, Position, Company Group member, Email address, Telephone number, Name, birth date and health status of the children	For 5 years after the program	Consent of the Data Subject For attending group level HR: Legitimate interest.	Directly the Data Subject Employer to the member of the Company Group performing group level HR tasks	MVMI Zrt. MVMI Zrt. MVM Services Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller

						Performing HR tasks under service contract
Administration in connection with recognitions, plus attending related group level HR tasks	Name, Birth date, Position, Photo, Former employment relationships, Email address, Address, Telephone number	For 3 years after termination of employment relationship	Consent of the Data Subject (photo), and Compliance with legal obligation For attending group level HR: Legitimate interest.	Directly the Data Subject Employer to the member of the Company Group performing group level HR tasks	NÜSZ Zrt. MVM Zrt. MVM Zrt. MVM Services Zrt.	Provision of administrative services for the Data Controller Operation of IT systems used by the Data Controller Controlling Company of the Company Group for the purpose of attending group level HR tasks Performing HR tasks under service contract
Evaluation of employee, competency based training, plus attending related group level HR tasks	Name of the person involved, test results (text, graphic report)	maximum 3 years, but erased immediately upon request	Consent of the Data Subject For attending group level HR: Legitimate interest.	Employer to the member of the Company Group performing group level HR tasks	MVM Zrt. MVM Services Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Performing HR tasks under service contract
Recording questionnaires on demands and evaluation in relation to employment, employer's operation, trainings and programs organized by the employer, collecting, storage and evaluation of answers, plus	Name, scope of job, group member company, organization unit, email address, place of work, telephone number, name of child under the age of 16	maximum 3 years, but erased immediately upon request	Consent of the Data Subject	Directly the Data Subject	MVM Zrt. MVM Zrt.	Controlling Company of the Company Group for the purpose of attending group level HR tasks Operation of IT systems used by the Data Controller

attending related group level HR tasks					MVM Services Zrt.	Performing HR tasks under service contract
Preventing, reducing epidemic danger, in pandemic situation reducing the risk of harm to technical safety and continuity of energy supply	Name, Birth name, Birth date, HR number, Notification address (place of residence), Employer, Organization unit, Scope of job, Telephone number, Email address, ID card number, place of residence in or outside of Hungary, travel destination, Health data on risk of infection	6 months after the end of the epidemic	Legitimate interest (GDPR Article 6 subsection (1) f)); The processing of special category of data is a labour law obligation in relation to employment (GDPR Article 9 subsection (2) point b)), for the purpose to ensure healthy and safe work conditions; Controlling company of the Company Group: Legitimate interest	Directly the Data Subject or its employer as data controller	MVM Zrt. Supervisory authorities and organs defined by law or the owner MVM Zrt.	Group level Crisis Team and Controlling Company of the Company Group for the purpose of attending group level security control tasks Controll, preparation of report, for statistic purposes Operation of IT systems used by the Data Controller
For property protection, supervision of employee/other contributor administration in connection with documents determined in the Rules on use of vehicles. Keeping register on the entitlement to drive vehicles for personal use with keys, keeping register of owned vehicles, keeping register of offences,	Name, Birth name, Birth date, Mother' maiden name, Address, Address card number, Notification address (place of residence), Email address, Telephone number, ID card number, Number and validity data of driving licence, Citizenship, Name of employer, Scope of job / position, Organization unit, Dates of using a vehicle, Licence plate of the vehicle, Name of the partner (company) visited, Address of the partner	For 5 years after termination of employment relationship, in case of administration regarding tax refund until the end of the statutory limitation period (generally for 5 years) after the tax year	Legitimate interest	Directly the Data Subject	Fleet management, lessor, service, insurance company, MVM Services Zrt., National Tax Authority Controlling company of the Company Group as per the	Vehicle administration Administrative supervision, verification of tax returns Group level control of the vehicle use

parking data, slae and purchase of vehicles, administration in connection with maintenance of vehicles (service, damages, GPS) and tax refunds.	(company) visited, Purpose of the use of the vehicle				group level fleet management rules MVMI Zrt.	Operation of IT systems used by the Data Controller
--------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------	--	--	--	-----------------------------------------------------	-----------------------------------------------------

Annex no. 1

The relevant members of the MVM Company Group (Employers/Data Controllers)

The group level Data Protection Officers of the MVM Company Group as required by the General Data Protection Regulation: Dr. Arató Dezső, Dr. Józán Flóra and Kovács István (availabilities: dpo@mvm.hu)

The data protection officer appointed for keeping contact with the Hungarian National Authority for Data Protection and Freedom of Information has been indicated at the relevant Data Controller:

Data Controller: **MVM Services Zrt.**
Registered seat: 1023 Budapest, Árpád fejedelem útja 26-28.
Postal address: 1023 Budapest, Árpád fejedelem útja 26-28.
Court Registration no.: 01-10-048351
Website: www.mvmnext.hu
E-mail address: info.mvmservices@mvm.hu
Telephone number: +36 30 737 8270
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **MVM Next Energiakereskedelmi Zrt.**
Registered seat: 1081 Budapest, II. János Pál pápa tér 20.
Postal address: 1439 Budapest, Pf. 700
Court Registration no.: 01-10-140263
Website: www.mvmnext.hu/nyitolap, mvmenergiakereskedo.hu, mvmaramkereskedo.hu
E-mail address: ugyfelszolgalat@mvm.hu
Telephone number: +36 1/20/30/70 474 9999
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **MVM Főgáz Földgázhálózati Kft.**
Registered seat: 1081 Budapest, II. János Pál pápa tér 20.
Postal address: Budapest 1425
Court Registration no.: 01-09-878954
Website: www.mvmfogazhalozat.hu
E-mail address: foldgazelosztas@mvmfogazhalozat.hu
Telephone number: +36 1/474-9911
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **MVM Égáz-Dégáz Földgázhálózati Zrt.**
Registered seat: 6724 Szeged, Pulcz u. 44.
Postal address: 6701 Szeged, Pf. 1220.

Court Registration no.: 06-10-000470
Website: www.mvmedgazhalozat.hu
E-mail address: info@mvmedgazhalozat.hu
Telephone number: +36 96/616-316; +36 20/615-6666; +36 30/70/640-6666
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **MVM Démász Áramhálózati Kft.**
Registered seat: 6724 Szeged, Kossuth L. sgt. 64-66.
Postal address: 6701 Szeged Pf.199.
Court Registration no.: 06-09-010805
Website: www.mvmdemaszhalozat.hu
E-mail address: ugyfelszolgalat@mvm.hu
Telephone number: +36 62 565 600
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **MVM Watt Eta Hálózati és Közvilágítási Szolgáltató Kft.**
Registered seat: 7627 Pécs, Engel János József utca 6.
Postal address: 7627 Pécs, Engel János József utca 6.
Court Registration no.: 02-09-063619
Website: www.mvmwatteta.hu
E-mail address: watt@mvmwatteta.hu
Telephone number: +36 72 511 599
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **MVM Oroszlányi Távhőtermelő és Szolgáltató Zrt.**
Registered seat: 2840 Oroszlány, Bánki Donát utca 2.
Postal address: 2840 Oroszlány Pf. 12.
Court Registration no.: 11-10-001601
Website: www.mvmtavho.hu
E-mail address: ugyfelszolgalat@mvmtavho.hu
Telephone number: 34/361-853, 34/361-171
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **MVM Mobiliti Kft.**
Registered seat: 1037 Budapest, Montevideo út 2/C.
Postal address: 1023 Budapest Árpád fejedelem útja 26-28.
Court Registration no.: 01-09-965868
Website: www.mobiliti.hu
E-mail address: mobiliti@mobiliti.hu

Telephone number: +36 62 565 758
Data Protection Officer: Kovács István (dpo@mvm.hu)

Data Controller: **Kapos CNG Kft.**
Registered seat: 1081 Budapest, II. János Pál pápa tér 20.
Postal address: 1023 Budapest Árpád fejedelem útja 26-28.
Court Registration no.: 01-09-272105
Website: www.mobiliti.hu
E-mail address: mobiliti@mobiliti.hu
Telephone number: +36 62 565 758
Data Protection Officer: Kovács István (dpo@mvm.hu)

Data Controller: **MVM Optimum Zrt.**
Registered seat: 1023 Budapest, Árpád fejedelem útja 26-28.
Postal address: 1023 Budapest, Árpád fejedelem útja 26-28.
Court Registration no.: 01-10-048700
Website: www.mvmoptimum.hu
E-mail address: napelem@mvm.hu
Telephone number: +36 20 527 5370
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **MVM Otthon Plusz Zrt.**
Registered seat: 1023 Budapest, Árpád fejedelem útja 26-28.
Postal address: 1023 Budapest, Árpád fejedelem útja 26-28.
Court Registration no.: 01-10-048193
Website: www.mvmotthonplusz.hu, mvmotthonplusz.hu
E-mail address: adatvedelem@mvmotthonplusz.hu
Telephone number: +36 30 737 8270
Data Protection Officer: Kovács István (dpo@mvm.hu)

Data Controller: **MVM Ügyfélkapcsolati Kft.**
Registered seat: 1081 Budapest, II. János Pál pápa tér 20.
Postal address: 1081 Budapest, II. János Pál pápa tér 20.
Court Registration no.: 01-09-324580
Website: www.mvmnext.hu
E-mail address: mvmugyfelkapcsolat@mvm.hu
Telephone number: +36 1/20/30/70 474 9999
Data Protection Officer: dr. Józán Flóra (dpo@mvm.hu)

Data Controller: **Grape Solutions Zrt.**
Registered seat: 1023 Budapest, Árpád fejedelem útja 26–28. I. emelet
Postal address: 1023 Budapest, Árpád fejedelem útja 26–28. I. emelet
Court Registration no.: 01-10-047087
Website: www.grape.hu
E-mail address: info@grape.hu
Telephone number: +36 1 880 9200
Data Protection Officer: dr. Józsan Flóra (dpo@mvm.hu)

Data Controller: **Flogiston Kft.**
Registered seat: 2000 Szentendre, Kőzúzó u. 5.
Postal address: 2000 Szentendre, Kőzúzó u. 5.
Court Registration no.: 13-09-061698
Website: www.flogiston.hu
E-mail address: kereskedelem@flogiston.hu
Telephone number: +36 26 501-000
Data Protection Officer: dr. Józsan Flóra (dpo@mvm.hu)