



PRIVACY NOTICE

In connection with the processing of the personal data of customers, partners, and users of the HelloPay Website, HelloPay Card and HelloPay Application

HelloPay Informatikai és Szolgáltató Zártkörűen Működő Részvénytársaság (registered office: 1037 Budapest, Montevideo str. 10.; company registration number 01-10-048364, registered in the Commercial Register of the Budapest General Court; tax number: 25155781-2-41, represented by Norbert Varga, CEO, e-mail address: dpo@helloyay.hu; hereinafter referred to as **"HelloPay"** or the **"Data Controller"**) hereby informs the data subjects about the processing of their personal data in connection with the use and application of the HelloPay website, HelloPay card and HelloPay app in accordance with Regulation 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter referred to as GDPR).

Capitalized terms used in this Privacy Notice have the same meaning as the same terms used in the HelloPay GTC.

The personal scope of the present Privacy Notice covers all personal data processing activities concerning potential HelloPay customers, partners with whom HelloPay has a business contract in force (**"Partners"**), employees of Partners, visitors to the HelloPay Website, users of the HelloPay App and Card (the persons in this paragraph hereafter collectively referred to as **"data subjects"**).

HelloPay may unilaterally amend this Privacy Notice at any time. This Privacy Notice is published on the HelloPay website and is also available in the HelloPay app. This Privacy Notice shall enter into force upon its publication.

In case of discrepancies between the Hungarian original version of the Privacy Notice and this English version, the Hungarian language version prevails.

HelloPay's data protection officer is Bea Csabai, contact details: e-mail: dpo@helloyay.hu; postal address: 1037 Budapest, Montevideo str.10

1. What personal data do we manage, for how long, for what purposes and by what authorization?

The legal bases for our data processing are the following:



- a) GDPR Article 6 (1) a) where the processing is based on the informed consent of the data subject (hereafter referred to as **Consent**);
- b) GDPR Article 6 (1) b), on where processing is necessary for the performance of a contract to which the data subject is party (hereafter referred to as **Performance of Contract**);
- c) GDPR Article 6 (1) c) where data processing is necessary for the fulfilment of or compliance with a legal obligation of the data controller (e.g. obligations regarding accounting, bookkeeping - hereafter referred to as **Legal Obligation**);
- d) GDPR Article 6 (1) f) where data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, (hereinafter referred to as: **Legitimate Interest**).

Upon request, the data subject is entitled to receive the legitimate interest balancing test concerning the data processing based on legitimate interest. The request must be submitted in an e-mail sent to the below customer service email address.

The data subject has the right to object to the data processing based on legitimate interest at any time; In this case, HelloPay will no longer process his/her data.

The legal basis for the data processing is specified below, per data categories and by reference to the elements of the above list.



1.1. Contact request through Website

The data subject sends a message to HelloPay via the form on the HelloPay Website to request information, request an offer, make a suggestion or otherwise in connection with HelloPay services.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Potential customer, Customer, Contact person / representative person of Partner, Employee of a Partner, Visitor of Website, User of HelloPay App	name, e-mail address, telephone number, date and time of receipt of the message, the content of the message and other personal data contained therein	From the data subject	Fulfilling of requests of information, answering suggestions or messages with other content by HelloPay.	Consent of the data subject under GDPR Article 6 (1) a)	The first day of the quarter following the first response to the contact request (for example, the date of deletion of a request responded to on 1 January 2024 is 1 April 2024).

The data subject has the right to withdraw his/her consent at any time.

1.2. Data processing relating to Customer service

Data subjects can request clarification and information and make suggestions about HelloPay services through HelloPay customer service, which is available in person and by e-mail and telephone.



Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Potential customer, Customer, Contact person / representative person of Partner, Employee of a Partner, Visitor of Website, User of HelloPay App	name, e-mail address, telephone number, the content of the message and other personal data contained therein	From the data subject	Fulfilling of requests of information, answering suggestions or other questions regarding HelloPay services in person or via e-mail.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	The first day of the quarter following the first response to the contact request (for example, the date of deletion of a request responded to on 1 January 2024 is 1 April 2024).
	recording of phone call (only in case of telephone helpdesk)	From the data subject	Ensuring the quality of work of HelloPay customer service staff, monitoring the quality of the customer service provided by HelloPay, and the submission, enforcement and defence of legal claims by HelloPay.	Consent of the data subject under GDPR Article 6 (1) a).	One year after the receipt of the request by the customer service.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data. The right to privacy is not violated when making an audio recording of a phone call, as the data subject is informed of the audio recording at the beginning of the call, before the call is made, and has the choice to continue or terminate the call. In addition to the telephone helpdesk, the e-mail helpdesk offers the same service and solution, i.e. the data subject has the choice to investigate or report his/her complaint, make a request and have it dealt with.



1.3. Handling consumer complaints

The data subject acting as a consumer may lodge a consumer complaint regarding HelloPay's services in person or by e-mail in accordance with Act CLV of 1997 on Consumer Protection ("Consumer Protection Act").

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Data subjects acting as consumers	name, e-mail address, telephone number, the content of the message and other personal data contained therein	From the data subject	Recording, investigating and responding to complaints received and maintaining the necessary contacts.	Fulfilment of legal obligation of HelloPay - GDPR Article 6 (1) c). The legal obligation: Section 17/A (5) of the Consumer Protection Act stipulates the mandatory elements of the minutes of complaints.	HelloPay retains the record of the complaint and a copy of the response for 3 years under Section 17/A (7) of the Consumer Protection Act.

1.4. Processing of contact persons' data

HelloPay's potential Customers, Partners, employees of Partners are in continuous and regular contact with HelloPay in connection with the conclusion, performance, monitoring and other issues related to the provision of the service in the context of the contracts concluded with HelloPay and service provision.



Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Contact persons of potential HelloPay customers, of Customers, of Partners, employees of Partners, self-employed Partners	name, e-mail address, phone number, name of the potential Customer / Partner undertaking	From potential Customer, Customer, Partner, or directly from Subject	General correspondence necessary for the conclusion, performance and provision of contracts and services.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	HelloPay retains the data for 5 years following the failure to conclude a contract / termination of a contract under Section 6:22 (1) of Act V of 2013 on the Civil Code ("Civil Code").
Individual entrepreneur partners	name, address, tax number, EV number, bank account number, the fact and content of the Individual Contract with HelloPay or the intention to enter into an Individual Contract	From the data subject	HelloPay forwards to its parent company, SimplePay Plc. and OTP Bank Plc. the listed information on the self-employed Merchant for the purpose of comparing it with the merchant data in its own portfolio, in order to exploit synergies of sales cooperation opportunities within the banking group.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	Until the termination of the contract with the data subject.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

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1.5. Fault and damage reports, on-site assistance

HelloPay Partners, Partners' employees may report any damage to the terminal or errors by phone or e-mail, which will be rectified by HelloPay. HelloPay will document the steps taken to rectify the report or fault in a protocol and, in the event of an on-site visit, will issue a worksheet, which must be signed on the spot by the Partner's representative.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Contact person, employee of Partner	name, phone number, signature, e-mail address	From the data subject	Troubleshooting and documentation of the fault, terminal failure, and related communication.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	HelloPay retains the data for 5 years following the rectification of the fault or terminal failure, under Section 6:22 (1) of the Civil Code.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

1.6. Allocation of tips to Partners' employees (waiters)

Partners and their employees have the option to receive the tips given to the employees through HelloPay via bank transfer from HelloPay.



Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Employees of Partners (waiters)	name, place and date of birth, mother's maiden name, address, name of the bank holding the account, bank account number, e-mail address	From the data subject	Transfer of tips	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	<p>HelloPay retains the data until consent is withdrawn, or for 5 years following the termination of the contract concluded with the Partner, under Section 6:22 (1) of the Civil Code.</p> <p>HelloPay retains data forming part of the accounting documents for 8 years under Section 169 (2) of Act C of 2000 on Accounting ("Accounting Act").</p>

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

1.7. Processing data of other merchants contracted with the Main Organiser Partner



For larger events, the Partner (main organiser) contracts HelloPay, who later settles with the other merchants who have a contract with the Partner. In such cases, HelloPay manages the merchants' data (e.g. contact details) in its admin system for the sole purpose of providing the service (e.g. troubleshooting).

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Merchant contact persons	name, e-mail address, phone number	From Partner	"In the case of event organisation, communication regarding organizational and performance issues related to service provision, and necessary troubleshooting.	HelloPay's legitimate interest under Article 6(1)(f) GDPR.	HelloPay retains the data for 5 years following the termination of the contract concluded with the Partner, under Section 6:22 (1) of the Civil Code.

The data subject has a right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

1.8. Operating the HelloPay App and registration to the HelloPay App

Once registered in the HelloPay App, the user can track their HelloPay card spending, HelloPay card balance.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
User registered to the HelloPay App	name, email address, phone	From the data subject	Using the HelloPay App	Performance of the contract concluded	5 years following the deletion of the user

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Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
	number, gender, date of birth HelloPay card number, balance			between HelloPay and the card holder - GDPR Article 6 (1) b).	profile, under Section 6:22 (1) of the Civil Code.

1.9. HelloPay card administration (registration, card order, card balance upload and retrieval)

The HelloPay card provides users with secure and efficient payment at HelloPay acceptance points. The purpose of data processing is to administer the transactions associated with the HelloPay card and to enable the user to order a HelloPay card and be informed of the balance on his HelloPay card.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
HelloPay cardholder	name, email address, phone number, date of birth, gender, HelloPay card number, time, place, amount of HelloPay card purchase and top-up transactions, HelloPay card balance, date of transaction.	From the data subject	Recording and tracking of HelloPay card transactions, and provision of queries by the HelloPay cardholder	Performance of the contract concluded between HelloPay and the card holder - GDPR Article 6 (1) b)	Until the deletion of the HelloPay user profile.



1.10. Billing for natural person customers after top-up of HelloPay card

If the cardholder customer tops up the HelloPay card, there is a 2% fee for this top-up, which is charged to the user by HelloPay.

Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
HelloPay cardholder	address, city, country (optional), postcode, name, e-mail address, tax identification number (optional)	From the data subject	Compliance with legal obligation	<p>To comply with HelloPay's legal obligation under Article 6(1)(c) of the GDPR.</p> <p>The legal obligation: the obligations set out in Act CXXVII of 2007 on Value Added Tax ("VAT Act") and the Accounting Act.</p>	<p>HelloPay retains data forming part of the accounting documents for 8 years under Section 169 (2) of the Accounting Act.</p> <p>HelloPay retains the documents under the scope of the VAT Act for 3 years following the issuing of the receipt under Section 179 of the VAT Act.</p>

1.11. Checking eligibility eligibility for student discount

HelloPay offers discounts to students, which can be claimed after verification of eligibility.

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Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Users wishing to claim the student discount	name, e-mail address, telephone number, date of birth, gender, student ID number, expiry date	From the data subject	Verification of eligibility	HelloPay's legitimate interest under Article 6(1)(f) GDPR	Until the deletion of the user profile, except for the student ID number, which is retained by HelloPay for 5 years following the deletion of the student ID number from the user profile, under Section 6:22 (1) of the Civil Code, or for 5 years following the deletion of the user profile.

The data subject has the right to object to the data processing based on legitimate interest at any time; in this case, HelloPay will no longer process his/her data.

1.12. Sending marketing messages

HelloPay sends marketing messages about its services to subscribers.



Data subject	Type of data	Data source	Purpose of data processing	Legal basis of data processing	Duration of data processing
Users registered in the HelloPay App Contact details of contracted or potential Merchants	name, e-mail address, phone number for HelloPay App users, gender	From the data subject	Promote HelloPay services by sending direct marketing messages.	Consent of the data subject under GDPR Article 6 (1) a).	Until consent is withdrawn.

The data subject has the right to withdraw his/her consent at any time.



2. Data transfers

2.1. Data processors

For the processing and storage of personal data of contact persons and representatives, we use various companies with whom we have concluded a data processing agreements. The following processors process personal data:

Data processors' name and address	Data processing activity	Information regarding data transfers to abroad
Eldacon Kft. (registered seat: 1094 Budapest, Tüzoltó street 57.; e-mail: gdpr@eldacon.hu / support@eldacon.hu)	HelloPay Website operation	-
Amazon Web Services EMEA SARL (AWS) (registered seat: 38 Avenue John F. Kennedy, L-1855 Luxembourg; e-mail: aws-EU-privacy@amazon.com)	HelloPay Website hosting service	-
MiniCRM Kft. (registered seat: 1075 Budapest, Madách Imre way 14.; e-mail: help@minicrm.hu)	CRM database provision and management Sending newsletters, marketing messages	-
Progen Kft. (registered seat: 1118 Budapest, Homonna street 8/A ; e-mail: info@progen.hu)	Operating of an invoicing programme	-
Microsoft Corporation (USA - One Microsoft Way Redmond, Washington 98052)	Office 365 service SharePoint Teams	Yes, data is transferred to the USA. Legal basis of transfer: European Commission adequacy decision on the EU-US data protection framework.
SimplePay Plc. (1138 Budapest, Váci út 135-139. B. ép. 5. em.)	Supporting marketing activity, business activity and IT security	-
OTP Bank Plc. (registered seat: 1051 Budapest, Nádor street 16.)	Accounting activity	-

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Opennetworks Kft. (registered seat: 1125 Budapest, Kiss Áron street 9.; e-mail: info@opennet.hu)	Fixed telephony, virtual switchboard services, recording and storage of telephone conversations related to customer service activities	-
Brandocs Solutions Kft. (registered seat: 2030 Érd, Moha street 4., e-mail: https://brandocs.hu/home/kapcsolat/)	Operation of integrated bid management software, related support and tracking services	-
Nordhanger Kft. (registered seat: 1013 Budapest, Attila út 2. B. lház 5. em. 8. ajtó)	System administrator services, IT security services related to Microsoft O365 services.	-
Titanium Venture Kft. (registered seat: 1121 Budapest, Kútvölgyi út 101/A 1. em.)	Business development, business management and related IT consultancy services, commercial agency activities.	-
Evolution Consulting Kft. (registered seat: 3515 Miskolc-Egyetemváros, AFKI ép. 2. em.)	Operation of the HRMaster software for managing working time records, vacation planning, and facilitating remote work.	-

2.3. Other data transfer

HelloPay conducts the following data transfers:

Recipient of data transfer	Purpose of data transfer	Information regarding data transfers to abroad
Quantum Diák munka Iskolaszövetkezet (2161 Csomád, Kossuth Lajos út 103.)	Provision of employment through a school cooperative.	-
SimplePay Plc. (1138 Budapest, Váci way 135-139. B. ép. 5. em.) OTP Bank Nyrt. (1051 Budapest, Nádor u. 16.)	HelloPay forwards to its parent company, SimplePay Plc.. and OTP Bank Nyrt. the listed information on the individual Merchant for the purpose of	-

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	comparing it with the merchant data in its own portfolio, in order to exploit synergies of sales cooperation opportunities within the banking group.	
Oktatási Hivatal (1055 Budapest, Szalay street 10-14.; e-mail: adatvedelem@oh.gov.hu / info@diakigazolvany.hu)	Check the validity period of your student card	-
Ernst & Young Könyvvizsgáló Kft. HU-1132 Budapest, Váci way 20.	Accounting activity	-
CMS Hungarian Branch Office and Ormai, Papp, Czike and Partners Cameron McKenna Nabarro Olswang LLP. Law Firm (1053 Budapest, Károlyi street 12.)	Legal services	-

3. HelloPay App users under the age of 16

If a person under the age of 16 registers to use the HelloPay App, the consent of a legal guardian is required for registration.

4. Use of Cookies

For more information about cookies used on the HelloPay Website, please refer to the HelloPay Cookie Notice, available here: www.hellopay.hu.

5. Rights of the data subjects

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

The information must be provided in writing or by other means, including electronic means where appropriate. Information may also be provided verbally at the request of the data subject, provided that the identity of the data subject has been verified by other means.



The Data Controller shall inform the data subject of the measures taken in response to his or her request without undue delay and in any event within one month of receipt of the data subject's request (see Articles 15 to 22 GDPR). If necessary and taking into account the complexity of the request and the number of requests, this period may be extended by a further two months. The Data Controller shall inform the data subject of the extension of the time limit, stating the reasons for the delay, within one month of receipt of the request. Where the data subject has made the request by electronic means, the information shall, where possible, be provided by electronic means, unless the data subject requests otherwise.

If the Data Controller does not act on the data subject's request, the Data Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

5.1. The data subject's right of access

- (1) The **data subject** has the right to obtain confirmation from the Data Controller whether or not personal data concerning him/her are being processed. Where the case is such, then he/she is entitled to have access to the personal data concerned and to the following information:
 - a) the purposes of the processing;
 - b) the categories of personal data concerned;
 - c) the recipients or categories of recipient to whom the personal data have been or will be disclosed including especially recipients in third countries and/or international organisations;
 - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - e) the right of the **data subject** to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning the **data subject**, or to object to such processing;
 - f) the right to lodge a complaint with a supervisory authority;
 - g) where the personal data are not collected from the **data subject**, any available information as to their source;
 - h) whether automated decision making (Article 22 (1) and (4) of the GDPR) is applied including profiling, and in such case, at least information in comprehensible form about the applied logic and the significance of such data processing and the expectable consequences it may lead to for the **data subject**.
- (2) Where personal data are forwarded to a third country, the **data subject** is entitled to obtain information concerning the adequate guarantees of the data transfer.



- (3) The Data Controller provides a copy of the personal data undergoing processing to the **data subject**. The Data Controller may charge a reasonable fee based on administrative costs for requested further copies. Where the **data subject** submitted his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless otherwise requested by the **data subject**.

5.2. The right to rectification

The data subject shall have the right to obtain from the Data Controller, at the data subject's request and without undue delay, the rectification of inaccurate personal data relating to him or her. The data subject shall also have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

5.3. Right to erasure ('right to be forgotten')

- (1) The data subject has the right that when he/she so requests, the Data Controller erase the personal data concerning him/her without undue delay where one of the following grounds applies:
- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Data Controller;
 - b) the data subject withdraws consent on which the processing is based, and no other legal ground subsists for the processing;
 - c) the data subject objects to the processing of his / her personal data and there are no overriding legitimate grounds for the processing;
 - d) the personal data have been unlawfully processed;
 - e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject;
 - f) the collection of the personal data occurred in connection with offering services regarding the information society.
- (2) In case the Data Controller has made the personal data public and then it becomes obliged to delete it as aforesaid, then it will, taking into account the available technology and the costs of implementation, take reasonable steps including technical steps in order to inform processors who carry out processing that the data subject has initiated that the links leading to the personal data concerned or the copies or reproductions of these be deleted.
- (3) Paragraphs (1) and (2) shall not apply to the extent that processing is necessary, among other things, for:



- a) exercising the right of freedom of expression and information;
- b) compliance with a legal obligation which requires processing by Union or Member State law to which the Data Controller is subject;
- c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- d) the establishment, exercise or defence of legal claims.

5.4. Right to restriction of processing

- (1) The data subject has the right to obtain a restriction of processing from the Data Controller where one of the following applies:
 - a) the accuracy of the data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data;
 - b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the Data Controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
 - d) the data subject has objected to processing based on the legitimate interest of the Data Controller pending the verification whether the legitimate interests of the Data Controller override those of the data subject.
- (2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
- (3) The Data Controller informs the data subject whose request has served as grounds for the restriction based on the above, before the restriction of processing is lifted.

5.5. Obligation to notify the rectification or erasure of personal data or restriction of processing

The Data Controller shall inform each recipient to whom or with which it has disclosed the personal data of any rectification, erasure, or restriction of processing, unless this proves impossible or involves a disproportionate effort. Upon request, the Data Controller shall inform the data subject of these recipients.



5.6. Right to data portability

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

5.7. Right to objection

- (1) The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of legitimate interest. In such a case, the Data Controller shall no longer process the personal data, unless the Data Controller can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- (2) Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject shall have the right to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

5.8. Right to lodge a complaint with a supervisory authority

The data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the provisions of the GDPR. In Hungary, the competent supervisory authority is the National Data Protection and Freedom of Information Authority (website: <http://naih.hu/>;



address: 1055 Budapest, Falk Miksa u. 9-11; mailing address: 1363 Budapest, Pf.: 9.; phone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu).

5.9. Right to an effective judicial remedy against a supervisory authority

- (1) The data subject has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him or her.
- (2) The data subject has the right to an effective judicial remedy if the supervisory authority does not handle a complaint or does not inform the data subject within three months of the procedural developments or the outcome of the complaint..
- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

5.10. Right to an effective judicial remedy against the Data Controller or the data processor

- (1) Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, the data subject has the right to an effective judicial remedy where he/she considers that his/her rights under the GDPR have been infringed as a result of the processing of his/her personal data in non-compliance with the GDPR.
- (2) Proceedings against the Data Controller or a processor shall be brought before the courts of the Member State where the Data Controller or processor is established. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has habitual residence. In Hungary, such proceedings fall within the jurisdiction of the General Court (in Hungarian: Törvényszék). The data subject may initiate proceedings - at his/her choice - before the competent General Court according to his/her place of residence or place of habitual residence. You can find more information about the availabilities of the courts here: www.birosag.hu

Budapest, 01. 07. 2025.