

INFORMATION ON DATA PROCESSING  
for the use of e-mobility service  
Valid from 31 August, 2021

**1. Name of data controllers/data processors**

Name of data controller: ELEKTRO PROFI Mobility Kft.

Address: 1148 Budapest, Fogarasi út 2-6.

Data controller's representative: Tamás Rózsa CEO

Data Controller's contact details: [mobility@elektroprofi.hu](mailto:mobility@elektroprofi.hu)

This information may be unilaterally modified and/or withdrawn by Data Controller at any time with simultaneously informing Data Subjects. Such informing shall be performed by posting on website or by directly notifying Data Subjects depending on the nature of alteration.

Data Processor's name: Motyó-Multimédia Bt. ('Motyó-Multimédia Limited Partnership') (developer of MOVIR IT system) Seat: 1114 Budapest, Bocskai u. 7. VAT No.: 28946142-3-41, representative: István András Motyovszki, contact details: [imotyomultimedia@gmail.com](mailto:imotyomultimedia@gmail.com) .

Data Processor's name: NEXTSERVER Kft. ('NEXTSERVER Ltd Co') (hosting service provider) **Seat:** 6722 Szeged, Mérey utca 12. VAT No.: 2797610-2-06, Contact details: <https://nextserver.hu> .

Data Processor's name: OTP Mobil Kft. ('OTP Mobil Ltd Co'), for those using e-mobility service.

The nature and purpose of the data processing activity performed by data processor is detailed in SimplePay Information on Data Processing, which can be accessed following the link: <http://simplepay.hu/vasarlo-aff>.

User statement

"I acknowledge the following personal data stored by the data controller in the user account of Elektro Profi Mobility Kft. (1148 Budapest Fogarasi út 2-6) in the user database of [www.epcharger.hu](http://www.epcharger.hu) will be handed over to OTP Mobil Ltd. who is trusted as data processor. The data transferred by the data controller are the following:

- Name

- E-mail adresse
- Billing adresse

The nature and purpose of the data processing activity performed by the data processor in the SimplePay Privacy Policy can be found at the following link: <http://simplepay.hu/vasarlo-aff>"  
( '<http://simplepay.hu/vasarlo-aff>"')

Recurring credit card payment (hereinafter referred to as Recurring payment) is a function included in the acceptance of credit cards provided by SimplePay meaning that in the future it is possible to make payments with credit card details provided by the Customer during the registration transaction without giving credit card details again.

By accepting this statement to use Recurring payment you allow to make subsequent payments made from your user account in this online application

([https://play.google.com/store/apps/details?id=hu.paytech.ep\\_charger](https://play.google.com/store/apps/details?id=hu.paytech.ep_charger)  
[/https://apps.apple.com/hu/app/ep-charger/id1469933610?l=hu](https://apps.apple.com/hu/app/ep-charger/id1469933610?l=hu))

without providing credit card details and you allow for the Merchant to make the payment without your transactional approval.

Please note: the processing of credit card details is in accordance with the rules of card issuers. Neither the merchant nor SimplePay has access to the credit card data.

The Merchant shall assume direct liability for false or unauthorized recurring payments initiated by the Merchant, any claim enforcement against the Merchant's payment service provider (SimplePay) shall be unavailable.

I have read this notification, I take notice of its content and accept it

## **2. Purpose of Information**

2.1 This Information includes the principles of the processing of the personal data provided during the use of electric car charging stations operated by Data Controller (e-mobility service). The purpose of this Information is to ensure that the rights and particularly the privacy rights of those making use of the e-mobility service provided by Data Controller be respected during the machine processing of their personal data (data protection).

2.2 When formulating the provisions herein, Data Controller took into account in particular the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council ('General Data Protection Regulation' or GDPR), Act CXII of 2011 on informational self-determination and the freedom of information, Act V of 2013 on the Civil Code, Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities, Act CVIII of 2001 on electronic commerce and on information society services, Act C of 2000 on accounting (concerning the production and retention of receipts), Act CXIX of 1995 on the use of name and address information serving the purposes of research and direct marketing and those of Act VI of 1998 on the publication of the Convention for the protection of individuals with regard to automatic processing of personal data, dated Strasbourg on 28 January, 1981.

### **3. Purpose of data processing, the scope of personal data processed and the legal base of data processing**

#### **3.1. Provision of e-mobility service for registered natural persons**

Purpose of data processing: Identification of user, distinguishing user from other customers, keeping contact, sending system message(s) related to service, concluding contracts, processing and recording contact person data, processing the data of electrical vehicle charging, performing contracts. Contact data reconciliation and updating. Keeping records of e-mobility services used earlier.

Source of data: directly from data subject, that is, from you.

Scope of processed data:

- User name
- Password
- Name
- Permanent address
- Email address
- Telephone number
- Make and license plate number of vehicle
- Unique identifier

Legal base of data processing: consent of Data Subject (GDPR, section (1) a), Art. 6) and the performance of contract (GDPR, section (1) b), Art. 6).

Possible consequence of failure to provide data: the breakdown of contract. Data provision is the condition of concluding contract. In case of failure to provide data, Data Controller is unable to perform service.

Planned deadline of data processing: Until the withdrawal of consent

### **3.2. Provision of e-mobility service for registered legal persons (enterprises)**

Purpose of data processing: Processing of customer data or contact person data in case of legal persons, sending system message(s) related to e-mobility service, identification of Customer, distinguishing Customer from other customers or users, keeping contact, contact data reconciliation and updating. Keeping records of services used earlier.

Source of data: directly from Data Subject, that is, from you.

Scope of processed data:

- User name
- Password
- Name
- Permanent address
- Email address
- Telephone number

Legal base of data processing: consent of Data Subject (GDPR, section (1) a), Art. 6) and the performance of contract (GDPR, section (1) b), Art. 6).

Possible consequence of failure to provide data: the breakdown of contract. Data provision is the condition of concluding contract. In case of failure to provide data, Data Controller is unable to perform service.

Planned deadline of data processing: Until the withdrawal of consent

### **3.3. Invoicing**

Purpose of data processing: producing the mandatory documentation and issuing the invoice related to performance of service.

Source of data: directly from Data Subject, that is, from you.

Scope of processed data:

- User name
- Permanent address
- Email address (in case of remote printing of invoice or enabling e-invoice)
- Unique identifier

Legal base of data processing: For compliance with the Act on accounting, fulfilling the legal obligation of Data Controller (GDPR, section (1) c), Art. 6).

Possible consequence of failure to provide data: the breakdown of contract. Data provision is the condition of concluding contract. In case of failure to provide data, Data Controller is unable to perform ordered service.

Planned deadline of data processing: 8 years upon issuing invoice

### **3.4. Establishing general contact using Data Controller's contact data**

Purpose of data processing: establishing contact, providing information.

Data Controller's telephone number and email address can be found on website [www.epcharger.hu](http://www.epcharger.hu), through which you have the opportunity to establish contact with Elektro Profi Mobility Kft.

Data Controller records any questions and requests for offers sent to Data Controller's central email address or to one of the staff members' personal email address or made by phone in order to answer them or send an offer in reply to such requests.

Source of data: directly from Data Subject, that is, from you.

Scope of processed data:

- Name
- Email address
- Telephone number

Legal base of data processing: data processing is necessary for performing a contract in which Data Subject is one of the parties, or it is necessary for taking the steps at Data Subject's request prior to concluding contract (GDPR, section (1) b), Art. 6).

Possible consequence of failure to provide data: the breakdown of contract.

Planned deadline of data processing:

if no contract is concluded between us, the data provided will be erased following the passing of the limitation period (5 years) calculated from the date of expiry of the validity period of offer. The reason is that should there be any legal dispute related to request for offer, an opportunity shall be provided for evidence in any possible court or administrative proceedings. Following the expiry of the validity period of offer, Data Controller shall only store data but shall not perform any processing operations on them.

In case of direct requests, Data Controller shall not forward your data to any third parties but the data provided shall only be stored on Data Controller's server if request is made by email and shall only be stored on paper in case of requests made by phone until the date designated above. In such a case, only Data Controller's staff members shall have access to your data.

### **3.5. Data processing in case of customer complaints**

Purpose of data processing: in case of users qualifying as customers, handling complaints and making arrangements concerning any reports and complaints related to the e-mobility service.

Source of data: directly from Data Subject

Scope of processed data:

- Name
- Permanent address
- Email address
- Telephone number
- Bank account number (to pay any damages)

Legal base of data processing: For compliance with the Act on consumer protection, fulfilling the legal obligation of Data Controller (GDPR, section (1) c), Art. 6).

Possible consequence of failure to provide data: failure to assess complaint or report

Planned deadline of data processing: 5 years

### **3.6. Retention of data recorded during service provision and communication with Data Subjects**

Purpose of data processing: enforcing any claims or supporting Data Controller's defense in any administrative procedure or legal dispute initiated by Data Subject user.

Source of data: directly from Data Subject, data recorded by charging station

Scope of processed data:

- Name
- Permanent address
- Email address
- Telephone number
- Make and license plate number of vehicle
- Bank account number (to pay any damages)

Legal base of data processing: It is Data Controller's legitimate interest (GDPR, section (1) f), Art. 6) to provide evidence in enforcing any claims against Data Subject user, or it is in the interest in Data Controller's successful defense in any administrative procedure or legal dispute initiated by Data Subject user.

Planned deadline of data processing: 5 years. In case of legal disputes, administrative proceedings or enforcing claims, 5 years upon the completion of the proceedings forming the base of case.

### **3.7. Avoiding and investigating any fraud or abuse related to service**

Purpose of data processing: avoiding, detecting and investigating any fraud or abuse related to the e-mobility service and making available any evidence necessary to initiate proceedings.

Source of data: directly from Data Subject, data recorded by charging station

Scope of processed data:

- Name
- Permanent address
- Email address
- Telephone number
- Make and license plate number of vehicle
- Bank account number (to pay any damages)

Legal base of data processing: Data Controller's legitimate interest (GDPR, section (1) f), Art. 6) It is Data Controller's legitimate interest to avoid any fraudulent charging from charging stations in Data Controller's operation or to detect any infringements, or avoid or detect any infringements endangering or doing harm to Data Controller's business secrets, reputation or assets.

Planned deadline of data processing: 5 years. In case of detecting any infringements, 5 years upon the completion of the proceedings forming the base of case.

### **3.8. Advertising service(s) and providing recruitment information for registered users**

Purpose of data processing:

- making contact concerning new or renewed services with the purpose of direct marketing with advertising content or with marketing purposes
- measuring customer satisfaction
- surveying buyer satisfaction
- invitation to a marketing event
- making contact through eDM (newsletter) or by phone with the involvement of a telemarketing service provider, preparing



interviews with those applying on the Karrier (Career) page of website

### **3.9. Processing the personal data of those applying in response to advertisements (applications, CVs):**

- Scope of personal data that may be processed: the parts PERSONAL DATA, OFFICIAL DATA and CONTACT DETAILS of the Registration form in Annex 1 hereto.
- Purpose of processing personal data: assessing application, concluding employment contract with the person selected. Data Subject shall be informed if he/she is not selected for the relevant job by employer.
- (3) Legal base of data processing: consent of Data Subject.
- (4) Recipients of personal data and recipient categories: senior staff member in charge of labour issues and authorised to exercise employer's rights with ElektroProfi Mobility Kft
- (5) Term of storing personal data: Until the assessment of application but for maximum 2 years. The personal data of any applicants not selected shall be erased after maximum two (2) years. The data of the person having withdrawn application shall also be erased.
- (6) Employer shall only retain applications with Data Subjects' expressed, explicit and voluntary consent provided that it is necessary to achieve its purpose of data processing in compliance with legal statutes. Such consent shall be requested from applicants following the closing of the recruitment process.

Legal base of data processing: consent of Data Subject (GDPR, section (1) a), Art. 6)

Data Subject gives his/her consent to the processing of his/her personal data in writing, in email or by following a link on the website, or by

checking the relevant box in the application put in place by Data Controller on the basis of this Information.

Scope of processed data:

- Name
- Address for service
- Email address
- Telephone number
- Additional information provided by user

Recording the data in application form in a MySQL database.

Possible consequence of failure to provide data: Data Subject is not informed about promotions and new information or is only informed about them with delay.

Planned deadline of data processing: Until Data Subject unsubscribes from newsletter or until the deadline set in the email written to CEO.

### **3.10. Disclosing personal data to any third parties or to authorities**

Unless a legal statute provides otherwise, any personal data may only be disclosed to third parties or authorities on the basis of an administrative order or subject to the express preliminary consent of the person making inquiry.

## **4. Liability for the personal data provided**

4.1. Uses warrants that it has legally obtained the consent of the natural person concerned to the processing of any personal data provided or made available about other natural persons by User during the use of Service. All liability for the user content and data uploaded to the application necessary for the use of Service and shared by User shall be borne by User.

4.2. Upon providing his/her email address and voluntarily providing his/her personal data, User assumes liability that

- a./ the data provided are from him/her and are correct,

b./ by using the data provided, only he/she or in case of a legal person user, the legal person represented by him/her makes use of the service or he/she has the consent of such legal person to the use of service.

With regard to such assuming of liability, all the liability related to the use of service at a given email address and/or with given data shall be borne by the User having registered the relevant email address and having provided the relevant data. If during registration User provides third party data for the use of service, any related liability shall be borne by User and in case of abuse, Data Controller shall have the right to enforce a claim for damages against the person making inquiry. In such a case, Data Controller shall give proceeding authorities all assistance to determine the identity of the offender.

4.3. For the purpose of the further development of its products and the assessment, improvement and extension of Services, Data Controller may do research and make anonymous statistics related to the data processed by it (hereinafter referred to as research activities). During research activities, Data Controller shall only use the data in an anonymous manner so that from them, the person of the individual making inquiry cannot be identified. Data Controller shall have the right to use the anonymous research results produced during research activities for the purpose of improving Services, launching new services and sending targeted online and traditional advertisements and newsletters to those making inquiry and sell anonymous research results to third persons.

## **5. Child protection**

Our products and services are not intended for persons under the age of 16. Accordingly, we request persons under 16 not to provide personal data for Data Controller. If we become aware of having collected any personal data from children under the age of 16, we will take any necessary steps to erase such data within the shortest possible time.

## **6. Principles and manner of data processing**

6.1 Data Controller shall process personal data in compliance with the principles of good faith, fairness and transparency and pursuant to the provisions in any effective legal statutes and the provisions set forth herein.

6.2 Data Controller shall make use of personal data strictly necessary for the use of Services subject to the consent of the Data Subject making inquiry and only for a particular specified purpose.

6.3 Data Controller shall only process personal data for the purpose set forth herein and in the relevant legal statutes. The scope of the personal data processed shall be proportionate to the purpose of data processing and shall not extend beyond it.

6.4 Data Controller shall not transfer any personal data processed by it to any third parties except the data processors specified herein and in some cases referred to herein, to external service providers.

An exception to this provision is the use of data in a statistically summarised form, which shall not contain any other data suitable to identify the Data Subject making inquiry and therefore, shall not be deemed to be either data processing or data transfer.

In some cases – official inquiry by the court or the police, legal proceedings due to the infringement of intellectual property or property rights or other infringement or the reasonable suspicion thereof, injury of Data Controller's interest, endangering the provision of Services etc., Data Controller may make available the personal data available of the Data Subject making inquiry to third persons.

6.5 Data Controller shall notify Data Subject user and all those to whom Data Controller earlier forwarded personal data for the purpose of data processing about any corrections, limitation or erasure of such personal data. Such notification may be omitted if with regard to the purpose of data processing, this does not do harm to Data Subject's legitimate interests.

6.6. Data Controller does not do profiling.

## **7. Data security measures**

Data Controller processes data in a closed IT system.

Data Controller provides for default and inbuilt data protection. For this, Data Controller takes proper technical and organisational measures in order to:

- precisely regulate access to the data;
- only permit access for people for whom such data are necessary to perform the related tasks, and only provide access even in such cases to data which are minimally necessary to perform such tasks;
- select the data processors appointed by it circumspectly, and ensure the security of data with an appropriate data processing contract;
- provide for the integrity, authenticity and protection of the data processed.

Data Controller shall take reasonable physical, technical and organisational security measures to protect Data Subjects' data, particularly against the accidental, unauthorised and illegal destruction, loss, alteration, transfer, use, access or processing thereof. Data Controller shall notify Data Subject without delay in case it becomes aware of any unauthorised access or use of personal data involving high risk for Data Subject.

If it is necessary to transfer the data of Data Subjects, Data Controller shall provide for the appropriate protection of the data transferred, for example, by the encryption of the data file. Data Controller shall be held fully liable for the processing of Data Subjects' data by any third parties.

Data Controller shall ensure that Data Subject's data be protected against destruction or loss by appropriate and regular backups, as well.

## **8. Covid-19 and data protection. The most important things to do**

### **8.1 Health care data in data processing register**

According to data protection legislation, health care data are such special personal data which enjoy enhanced protection due to their sensitive character.

In the present case, section 2 h) of Article 9 of GDPR supercedes the prohibition of health care data processing if such data processing is necessary for preventive health care or occupational health care reasons, to assess employee's ability to perform or to make a medical diagnosis.

### **8.2 Collective procedure**

As Employer (Data Controller), Elektro Profi Mobility Kft only collects health data in relation to work (depending on the task to be performed). The company does not store these data, does not do data processing and does not transfer such data to any third parties.

### **8.3 Balance of interests test**

If it is evident that from the aspect of legality, the provisions of Art. 6 of GDPR cannot be left out of consideration, either, then Elektro Profi Mobility Kft examines in the form of a balance of interests test whether data processing is compatible with the purpose for which personal data have been collected.

### **8.4 Legal handling of test results**

Whether the result of the Covid test is positive or negative, it is undoubtedly the employee's personal data. Therefore, in line with the principle of data minimisation, according to which stored personal data shall be restricted to those necessary for the purpose of data processing, Employer (in this case, Elektro Profi Mobility Kft) shall be content with only becoming aware of the fact whether the test result made available by employee is negative or positive without storing the entire test result. If for some reason, storage is indispensable, for example, because the relevant job requires more intensive testing for tracking employee's state of health and the workplace effects thereof, with special regard to the other employees' / customers' health, employees shall be informed about the circumstances and duration of storage and their rights related to such data, e.g. the right of access.

### **8.5 Communication**

As employer, Elektro Profi Mobility Kft shall ensure the health and safety of all of its employees. Therefore it shall make it public if anybody has a positive test result. As much as possible, in such communication, it shall be avoided to name Data Subject and only the most necessary information shall be made public.

## **9. Procedure in case of a data protection incident**

If Data Processor(s) become(s) aware of a data protection incident, he/she/they shall report it to Data Controller without delay.

In such a report, minimally:

- the nature of the data protection incident shall be described including the categories and approximate number of Data Subjects as well as the categories and approximate number of data affected by such incident;
- the name and contact details of the data protection officer and other contact persons providing further information shall be communicated;
- the probable consequences of the data protection incident shall be described;
- The measures taken or planned by Data Controller, including in a relevant case the measures aimed at alleviating any adverse consequences arising from the data protection incident, shall be described. If it is not possible to disclose pieces of information simultaneously, they may be disclosed later, in parts, without any undue delay, as well. Data Controller shall record data protection incidents, indicating the facts related to the data protection incident, the effects thereof and the measures taken to remedy it. These records make it possible for supervising authority to check compliance with the requirements in this article.

Data Controller shall inform Data Subject of the data protection incident without delay.

## **10. Data Subject's rights**

Using the contact details in section 1 herein, Data Subject may request Data Controller

- to provide information about the processing of his/her personal data,
- to rectify his/her data,
- to provide information about data processing,
- to erase his/her personal data and to restrict data processing.

Data Subject may exercise the above rights at any time.

Furthermore, Data Subject may contact Data Controller using the contact details in section 1 herein

- requesting Data Controller to transfer his/her data to another data controller if data processing is subject to a contract or consent and Data Controller processes data in an automatised procedure.
- making arrangements to withdraw his/her consent given earlier to data processing.

Data Controller shall handle or reject request (with justification) within 1 month upon the submitting thereof the latest, or in an exceptional case, within a longer deadline permitted by law. Data Controller shall notify Data Subject of the result of assessment in writing.

### **10.1 Cost of providing information**

For the first time, Data Controller shall take measures and provide information free of charge.

If within one month, Data Subject requests the same data that have not changed in the meantime, Data Controller charges an administrative cost.

- The base of charging an administrative cost is the cost per hour of double the current minimum wage as an hourly fee.
- The number of working hours used for information provision charged at the former hourly fee.
- Furthermore, in case of a demand for paper-based information provision, the cost of printing reply at production cost and the cost of mailing.

### **10.2 Refusal to provide information**

If Data Subject's request is clearly unfounded, or Data Subject has no right to information, or Data Controller is able to prove that Data Subject possesses the requested information, Data Controller shall reject the request for information.

If Data Subject's request is exaggerated particularly due to its repetitive character, Data Controller may refuse to take the requested measure if

- Data Subject submits a request to exercise the same right for the third time within a month.

### **10.3 Right to object**

Data Subject shall have the right to object to the processing of his/her personal data on account of a legitimate interest or public powers as a legal base at any time.



In such a case, Data Controller shall not continue processing personal data except if it proves that data processing is justified by such compelling legal grounds which have priority over Data Subject's interests, rights and freedoms, or which are related to the making, enforcing or protecting of legal claims.

If Data Controller establishes the well-foundedness of the legal base of objection, Data Controller shall stop data processing within the shortest possible time – including data transfer and any further recording of data. Data Controller shall notify of such objection all those to whom it has transferred Data Subject's data before.

With the exception of unfounded or exaggerated requests for which Data Controller may charge a fee of reasonable amount, proportionate to its administrative costs, it is free of charge to process a request. If Data Subject does not agree with the decision made by Data Controller, he/she may initiate legal proceedings before a court.

## **11. Information about engaging a Data Processor**

10.1 For the processing of personal data, Data Controller engages the following Data Processors for the designated activities (data processor/activity performed):

- Hosting service provider (for application): Profi Plus Kft ('Profi Plus Ltd Co') (Registration No.: 01-09-164690) – Operating and providing file server;
- Post office: Magyar Posta Zrt. ('Hungarian Post Office Plc') (Registration No.: 01-10-042463) – Sending letters
- Online payment: Barion Payment Zrt. ('Barion Payment Co Ltd') (Registration No.: 01-10-048552) – Providing Barion online payment system
- Motyó-Multimédia Bt.: seat: 1114 Budapest, Bocskai u. 7. VAT No.: 28946142-3-41, representative: István András Motyovszki, contact details: [imotyomultimedia@gmail.com](mailto:imotyomultimedia@gmail.com) .
- NEXTSERVER Kft. ('NEXTSERVER Ltd Co') (web hosting service provider) Seat: 6722 Szeged, Mérey utca 12. VAT No.: 22797610-2-06, contact details: <https://nextserver.hu> .

10.2 Data Processor shall not make independent decisions but shall only have the right to proceed in accordance with the contract concluded with Data Controller and the instructions received.

10.3 Data Controller shall control Data Processor's work.

10.4 During its research activities, Company may engage further data processors for the processing, analysing and assessing of data.

10.5 Data Processors shall only have the right to engage further data processors with Data Controller's consent.

## **12. Possibility of data transfer**

10.1 Data Controller has the right and is obliged to transfer any personal data available to it and properly stored to the competent authorities if Data Controller is obliged to transfer such personal data by law or effective administrative order. Data Controller shall not be held liable for such data transfer or any consequences thereof.

10.2 If Data Controller has Data Subject's express authorisation for it, Data Controller shall have the right to transfer the personal data indicated in such authorisation for the purpose and term indicated therein to the third party indicated therein. The processing of transferred data is governed by the data processing regulations of such third party.

10.3 In order to check the legality of data transfer and to ensure data provision for those making inquiry, Data Controller shall keep records of data transfer.

## **13. Amendment of Information on Data Processing**

11.1 Data Controller reserves the right to amend this Information with its unilateral decision at any time.

11.2 By entering next, the person making inquiry accepts the currently effective provisions in this Information. Beyond this, there is no need to obtain the further consent of the individual parties making inquiry.

## **13. Possibilities to enforce rights**

Using the contact details in section 1 herein, you may contact Data Controller's staff members with any questions or remarks concerning data processing.

In case of any assumed impairment of a right related to the processing of his/her personal data, Data Subject may contact the competent regional court, in the capital the Budapest Capital Regional Court, as well, or may initiate an investigation with the National Authority for Data Protection and Freedom of Information.

Address: 1024 Budapest, Szilágyi Erzsébet fasor 22/C.,  
Contact details: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), +36-1-3911400, [www.naih.hu](http://www.naih.hu),

## 14. Definitions

**„data controller”**: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**„data processor”**: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**„personal data”**: any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**„data processing”**: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**„restriction of data processing”**: the marking of stored personal data with the aim of limiting their processing in the future;

**„data processing incident”**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

**„profiling”**: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

**„filing system”**: any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

**„recipient”**: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or

not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

**„third party“**: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

**„consent of data subject“**: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

**„Consumer“**: a natural person proceeding outside the scope of his/her trade, independent occupation or business activity.

**„Consumer contract“**: a contract where one of the parties qualifies as a consumer.

**„Enterprise“**: a person proceeding within the scope of his/her trade, independent occupation or business activity.

**„User“**: a natural or legal person who actually makes use of Data Controller's service.

Dated Budapest, 25 August, 2021

Tamás Rózsa