



**Díjnet Zrt.**

[www.dijnet.hu](http://www.dijnet.hu)

# **PRIVACY POLICY**

April 08, 2021



## TABLE OF CONTENTS

1.	INTRODUCTION.....	3
2.	THE TYPE OF PERSONAL DATA AND THE PURPOSE, LEGAL BASIS, AND DURATION OF DATA PROCESSING.....	4
	<b>WWW.DIJNET.HU.....</b>	<b>5</b>
2.1.	LOGGING ON THE DIJNET.HU SERVER.....	5
2.2.	THE HANDLING OF COOKIES BY DIJNET.HU.....	6
2.3.	REGISTRATION ON THE DIJNET.HU WEBSITE .....	7
2.3.1.	REGISTRATION FOR BILL ISSUERS.....	8
2.3.2.	PAYING BILLS USING THE DÍJNET SYSTEM .....	11
2.3.3.	REPORTING METER READINGS .....	12
2.3.4.	DONATIONS .....	12
2.4.	THE DÍJNET NEWSLETTER.....	13
	<b>CONTACT.....</b>	<b>15</b>
2.5.	CORRESPONDENCE WITH DÍJNET .....	15
	<b>OTHER DATA PROCESSING.....</b>	<b>17</b>
3.	THE METHOD FOR STORING PERSONAL DATA, THE SECURITY OF DATA PROCESSING .....	18
4.	THE DATA AND CONTACT INFORMATION OF THE DATA PROCESSOR .....	19
5.	DATA SUBJECT RIGHTS AND POSSIBILITIES FOR LEGAL REMEDY .....	20



## 1. INTRODUCTION

Díjnet Zrt. (1117 Budapest, Budafoki út 107-109., hereinafter: Díjnet, Service Provider, or Controller) as controller, hereby acknowledges the contents of this legal notice as binding upon itself. It undertakes to ensure that all data processing in connection with its activities shall meet the requirements of this Policy and the provisions of relevant legislation.

Díjnet Zrt.'s Privacy Policy is always available at the address <https://www.dijnet.hu/adatkezelesi-tajekoztato.html>.

Díjnet Zrt. maintains the right to amend the Policy at any time. It will naturally inform the affected parties in due time of any such changes.

If you have any questions regarding this notice, please [write](#) to us. Our colleagues will be happy to provide answers.

Díjnet Zrt. is committed to the protection of the personal data of its customers and partners, and it considers the respect of its customers' right to self-determination to be especially important.

Díjnet Zrt. processes personal data confidentially and takes all the security, technical, and organizational measures necessary to guarantee the security of data.

Below, Díjnet Zrt. provides information on its data processing practices:

## 2. THE TYPE OF PERSONAL DATA AND THE PURPOSE, LEGAL BASIS, AND DURATION OF DATA PROCESSING

Below, Díjnet Zrt. provides information on its data processing principles and presents the requirements that it has set out for itself as Controller, and which it keeps. Its data processing principles are in line with the relevant legislation pertaining to data protection, thus especially the following:

- ✓ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the General Data Protection Regulation or GDPR);
- ✓ Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Information Act);
- ✓ Act V of 2013 on the Civil Code (Civil Code).

The following processor performs general tasks involving the data processing performed by Díjnet Zrt.:

### *Data Processor:*

<b>Name</b>	<b>Registered seat</b>	<b>Data processing task</b>
Díjbeszedő Informatikai Kft.	1117 Budapest, Budafoki út 107-109.	data center hosting, operation of the SMTP server used for the exchange of information, sending newsletters

## 2.1. LOGGING ON THE DIJNET.HU SERVER

When visiting the [www.dijnet.hu](http://www.dijnet.hu) website, the server automatically logs the user's activities.

*The purpose of data processing:* the Service Provider records guest data when they visit the website in the interest of checking the operation of the services and to prevent abuse.

*The legal basis of data processing:* the Controller has a legitimate interest in the identification of users and preventing abuse [Article 6(1)(f) of the GDPR].

*The type of processed personal data:* identification number, the date and time of the visit, the address of the visited and the previous website, and the IP address of the user's computer<sup>1</sup>.

*The duration of data processing:*

✓ thirty days.

In connection with the forms available on the website, the dijnet.hu server records the IP address of the user's computer, the browser type and version, and the date and time of accessing the form in addition to the data provided by users, which data it stores for ninety days.

*Data processing in connection with logging performed by third-party providers:*

The site's html code contains links independent of the Controller that arrive from and lead to external servers. The third-party provider's computer is directly connected to the user's computer. Visitors should note that the providers of these links are able to collect user data (e.g. IP address, browser, operating system data, the addresses of visited pages, and the time and date of the visit) for the purposes of ensuring a direct connection to their server and for directly communicating with the user's browser.

Any content tailored to the user is provided by the server of the external provider.

The following controllers can provide detailed information on the processing of data by the servers of external providers.

The Google Analytics service of Google LLC (1600 Amphitheatre Parkway, Mountain View, CA, 94043, United States of America) collects and stores data about visitors. The website runs Google Analytics, Google tag manager, and the Facebook tracking code integrated by Google tag manager.

The Google Analytics pixel has been installed on the website, which is used to send data to Google Analytics about the visitor's device and its behavior. It tracks the visitors via the device and through marketing channels.

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<sup>1</sup> IP address: A series of numbers that allows the unequivocal identification of the devices used by users to access the network.

By clicking on the “How does Dijnet work?” menu item, the website plays a video from Dijnet’s YouTube channel.

At the following address, Google LLC, proceeding as processor, provides information on the data processing involved when using Google’s services: <http://www.google.com/intl/hu/policies/>.

The [Facebook Data Policy](#) provides detailed information on data processing in connection with tracking.

[Google’s Privacy Policy and Terms of Service](#) provides detailed information regarding the data processing carried out on Dijnet Zrt’s YouTube page.

*Data Processor:*

Name	Registered seat	Data processing task
Google LLC	Mountain View, CA, 94043 1600 Amphitheatre Parkway, United States of America *	the provision of analytical services on the dijnet.hu website using the Google Analytics service detailed information on analytical data processing: <a href="http://www.google.com/intl/hu/policies/">http://www.google.com/intl/hu/policies/</a>

## 2.2. THE HANDLING OF COOKIES BY DIJNET.HU

In the interest of tailored service, the Service Provider saves small data packets called cookies on the user’s computer, which it reads during subsequent visits to the site. If the browser returns a cookie that had been previously saved, the service provider handling the cookie has the option to connect the user’s current visit with previous visits, but only as regards its own content.

### Necessary cookies

*The legal basis of data processing:* the Controller has a legitimate interest in the identification of users [Article 6(1)(f) of the GDPR]

Type	Name	Purpose	Validity
Necessary	JSESSIONID	remembers user settings during all page queries	until the end of the session
	HAPROXY_SESSION		until the end of the session

*The type of personal data processed:* identification number, date, time.

### Consent-based cookies

*The legal basis of data processing:* the data subject’s voluntary consent [Article 6(1)(a) of the GDPR]

Type	Name	Purpose	Validity
User preferences	lang	storage of the preferred language	three months
	lang	defining the preferred	not specified

\*Additional information regarding Google LLC is available in Chapter 3 of this Policy.

		language and country setting	
<i>Statistical</i>	_ga	registers a unique identifier that is used to generate statistical data on how the visitor uses the website.	two years

*The type of personal data processed:* identification number, date, time.

Cookies valid until the end of the session remain on the computer only until the browser is closed.

Cookies with specific validities (permanent cookies) are stored on the computer until deleted, but no later than until the expiry of their validity.

Users can delete cookies from their own computers and can block the use of cookies in their browsers. Cookies can generally be managed in the Tools/Settings menus of browsers, under Data protection/History/Personal settings, where they are referred to as cookies or tracking.

More information on cookies is available at the following address:

<http://www.adatvedelmiszakerto.hu/cookie>

*The right of the data subject to object:*

- ✓ the data subject is entitled to object against the processing of its personal data under Article 6(1)(f) of the GDPR at any time; in this case, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

### 2.3. REGISTRATION ON THE DIJNET.HU WEBSITE

Users must register for using Díjnet's services.

*The purpose of data processing:* differentiating between users, creating and maintaining the registration necessary for the bill presentation service, and using the services; the use and maintenance of bill payment and related services; sending emails in connection with the performance of the service.

*The legal basis of data processing:* data processing is necessary for the performance of the contract [Article 6(1)(b) of the GDPR].

*The type of personal data processed:* identification number, date, time, login name, email address, password, name, address, phone number, the IP address of the user's computer<sup>2</sup>.

<sup>2</sup>IP address: A series of numbers that allows the unequivocal identification of the devices used by users to access the network.

By using the Díjnet SzámlaPlusz service, the previous bills provided by service providers to the user using Díjnet remain available past the 18 month term of the free basic service, until the data subject requests that they be deleted.

The duration of data processing:

- ✓ the data of unconfirmed registrations: 30 days,
- ✓ until the assessment within 30 days of the user's request for deletion, but for no more than 18 months from the user's last login/bill presentation.

*The deletion and amendment of data:*

- ✓ Users are entitled to initiate the deletion and amendment of their personal data at any time, by logging into their accounts and navigating to the "Comments and complaints" menu;
- ✓ or via the Controller's contact information provided in Chapter 4 of this Policy.

*Forgotten password:*

- ✓ When using the "Forgotten password" function, the user has to provide a username and the registered email address. After entering the required data, the user will be sent a link via email. Clicking on it allows the user to reset the password.

*Possible consequences of failure to provide data reporting:* the data subject is unable to create a Díjnet account.

### 2.3.1. REGISTRATION FOR BILL ISSUERS

Users can initiate the use of the electronic bill presentation service under the "Bill issuers / Bill issuer registration" menu item after logging in to their Díjnet accounts.

*The purpose of data processing:* keeping records of users, differentiating between users, contact, electronic bill presentation, sending email notifications of bills received, logging the viewing of bills by users, participating with users in fulfilling their accounting obligations.

*The legal basis of data processing:* data processing is necessary for the performance of the contract [Article 6(1)(b) of the GDPR].

*The type of personal data processed per bill issuer:*

- Allianz Hungária Zrt.: policy number, displayed name, name of the contracting party, serial number of the bill/accounting document, the mother's maiden name of the contracting party, the contracting party's place and date of birth, email address, and phone number;



- Criterion Zrt.: the contracting party's name, payment code, displayed name, numbers of bills no older than six months;
- Direct One (Canal+ Luxembourg S. à r.l.): customer number, displayed name, billing name, billing address, new subscriber's statement that the user does not yet have a paper-based bill, are the last 9 characters of the bill numbers no older than six months, if they are longer than 9 characters;
- Díjbeszedő Holding Zrt.: payment identifier, eligibility (payer/consumer, common representative, representative/agent of the economic operator), displayed name, charge summary no older than six months, name displayed on the charge summary;
- DMRV Duna Menti Regionális Vízmű Zrt.: payer name, number of the contractual current account, displayed name, date and serial numbers of bills no older than six months;
- DRV Dunántúli Regionális Vízmű Zrt.: customer name, user identification number, number of the contractual current account, displayed name, name and address of the billed party;
- E.ON Áramszolgáltató Kft.: user identifier, number of the contractual current account, displayed name, customer name and address, bank account number;
- ÉDV Zrt.: customer name, number of the contractual current account, displayed name, user identifier, customer address, email address;
- E.R.Ö.V. Víziközmű Zrt.: user name, identification number, displayed name, serial numbers of bills no older than six months, site identification number (last 4 characters of the GIRO code);
- ÉRV Zrt.: customer name number of the contractual current account, displayed name, customer identification number, name of the billed party;
- Érd és Térsége Csatorna-szolgáltató Kft.: customer (payer) name, identification number, displayed name, serial numbers of bills no older than six months;
- ÉTV Kft.: consumer name, identification number, displayed name, numbers of bills no older than six months;
- FEJÉRVÍZ Zrt.: user ID number (contract number), displayed name, number of contractual account, e-mail address, business partner (user) name, address of use (city), address of use (road, street, square), address of use (house number / floor, door, other marking), phone number.
- FCSM Zrt.: customer (payer) name, identifier, displayed name, serial numbers of bills no older than six months, consent for FCSM Zrt. to use the email address provided here to contact the user in connection with the service provided.
- FÓTÁV Nonprofit Zrt.: customer name, customer identifier, date and serial numbers of bills no older than three months, displayed name;
- GYŐR-SZOL Zrt.: customer name, district heating customer identifier, displayed name, numbers of bills no older than six months;
- Invitel Zrt.: displayed name, customer name, client identifier, consent for Díjnet to provide Invitel Zrt. with the email address provided to Díjnet and for Invitel Zrt. to process such email address as a notification address and use it to send notices from the service provider concerning the subscription legal relationship (e.g. contract amendments, notifications concerning amendments to the GTC); the user acknowledges that Invitel's Privacy Policy is included in Invitel Zrt.'s General Terms

- and Conditions; consent for Invitel Zrt. to send offers to the email address provided to Díjnet in connection with its services;
- Kaposvári Vagyonkezelő Zrt.: user name, identification number, displayed name, serial numbers of bills no older than one month;
  - KAVÍZ Kft.: user name, identification number, serial numbers of bills no older than six months;
  - Hungarian branch office of MetLife Europe d.a.c.: name of contracting party, policy number, displayed name;
  - MVM Next Energiakereskedelmi Zrt. – electricity: the contracting party's current account number / payment identifier;
  - MVM Next Energiakereskedelmi Zrt. – natural gas: claimant's legal title (private person / representative/agent of economic organization), customer identifier, contract current account number, displayed name, customer name, email address, contractual customer's date of birth and mother's maiden name;
  - Nyírségvíz Zrt.: user name, identification number, displayed name, serial numbers of bills no older than six months;
  - Nyírtávhő Zrt.: user name, identification number, displayed name, serial numbers of bills no older than six months;
  - PANNON-VÍZ Zrt.: customer name, identification number, displayed name, numbers of bills no older than six months, place and date of birth, mother's maiden name, bank account number;
  - Stabil-Téka Épület és Lakásfenntartó Kft.: owner name, consumer identifier, email address, displayed name, Prepayment request number;
  - Szegedi Vízmű Zrt.: current account identifier, customer identifier, displayed name, payer name, date of birth, mother's maiden name;
  - SZÉPHŐ Zrt.: user name, number of the contractual current account, displayed name, user identifier, email address;
  - Magyar Telekom Nyrt.: MT client identifier, current account number, numbers of bills no older than three months, displayed name, consent for Díjnet to provide Magyar Telekom Nyrt. with the email address provided to Díjnet and for Magyar Telekom Nyrt. to process such email address as a notification address and use it to send notices from the service provider concerning the subscription legal relationship (e.g. contract amendments, notification on amendments to the GTC). The user acknowledges that Magyar Telekom Nyrt's Privacy Policy (which also extends to the email address) are included in Telekom's General Terms and Conditions;
  - Tettye Forrásház Zrt.: customer (payer) name, identification number, displayed name, serial numbers of bills no older than six months;
  - TRV Zrt.: customer name number of the contractual current account, displayed name, customer identification number;
  - TiszaSzolg 2004 Kft.: customer name, customer identifier, displayed name, numbers of bills no older than six months;
  - VKSZ Zrt.: customer (payer) name, identification number, serial numbers of bills no older than six months;
  - Vodafone Cégcsoport (former UPC service): customer number, displayed name, billing name, billing address, new subscriber's statement that the user does not yet

have a paper-based bill, are the last 9 characters of the bill numbers no older than six months, if they are longer than 9 characters.

*The duration of data processing:*

- ✓ 18 months from the time the bills are made available to the user, or
- ✓ until the assessment within 30 days of the user's request for deletion.

*The deletion and amendment of data:*

- ✓ users are entitled to initiate the deletion and amendment of their personal data at any time, by logging into their accounts and navigating to the "Bill issuers" menu, the "Previous registrations" tab, and then clicking on the "Initiate deletion" button;
- ✓ or via the Controller's contact information provided in Chapter 4 of this Policy.

*Data transfer:*

- ✓ all data provided during registration are forwarded to the selected bill issuers in the interest of the electronic presentation of bills.

*The legal basis of the data transfer:* data processing is necessary for the performance of the contract [Article 6(1)(b) of the GDPR].

### 2.3.2. PAYING BILLS USING THE DÍJNET SYSTEM

In the Díjnet system, users can use their bank cards to pay the bills issued by service providers. Payment uses the OTP Mobil Kft. (1143 Budapest, Hungária krt. 17-19.) system or, if the user decides to pay via mobile, the iCsekk application or, in case of customer current accounts held at Díjnet's contractual partners (CIB Bank Zrt., Erste Bank Hungary Zrt.), the online banking services offered by these banks.

Entering the username and password necessary for logging in to the Díjnet system in the iCsekk application connects the Díjnet and iCsekk user accounts, which allows users to pay the bills they receive in their Díjnet accounts using the iCsekk application.

*The purpose of data processing:* keeping records of users, differentiating between users, contact, payment of bills, increasing the security of payment via bank card.

*The legal basis of data processing:* data processing is necessary for the performance of the contract [Article 6(1)(b) of the GDPR].

*The type of personal data processed:* transaction identifier in connection with online payment, transaction date, transaction time, transaction amount, bank card displayed name, bank card unique identifier, in case of payment via an online bank, a unique registration identifier, name, email address, phone number, delivery data.

*The duration of data processing:*

- ✓ until the assessment within 30 days of the user's request for deletion, but for no more than
- ✓ 18 months from the user's last login/bill presentation,

- ✓ in the case of the use of Díjnet's SzámlaPlusz service, until the user's request for deletion.

*Data transfer:*

- ✓ in case of payment via online bank, the user's registration identifier is forwarded to the financial service provider, the bill expiration data, the name of the bill issuer, and the amount of the bill;
- ✓ the data of the payment transaction are forwarded to the bill issuer in question.

*The legal basis of the data transfer:* data processing is necessary for the performance of the contract [Article 6(1)(b) of the GDPR].

*Data processing in case of payment via bank card:*

If using the SimplePay single-use bank card payment method, the payment identifier, the transaction amount, email address, phone number, and delivery address data and, if using the SimplePay registered bank card payment method, the payment identifier, transaction amount, bank card identifier, and email address are forwarded to OTP Mobil Kft. (1143 Budapest, Hungária krt. 17-19.), as processor providing the bank card payment process. The bank card identifier is a unique identifier generated by SimplePay that enables the identification of the card data saved in the SimplePay system.

The privacy policy pertaining to SimplePay's activities are available at the <http://simplepay.hu/vasarlo-aff> address.

### 2.3.3. REPORTING METER READINGS

By logging in to their Díjnet accounts, users can report the apartment water sub-meters for which billing is handled by Díjbeszedő Holding Zrt. (1117 Budapest, Budafoki út 107-109), after entering their payment identifiers and the meter's serial number.

*Data transfer:*

- ✓ the payment identifier, the meter serial number, and the meter reading are forwarded to Díjbeszedő Holding Zrt. (1117 Budapest, Budafoki út 107-109.) for the purposes of recording consumption data.

*The legal basis of the data transfer:* data processing is necessary for the performance of the contract [Article 6(1)(b) of the GDPR]

### 2.3.4. DONATIONS

Under the "Donations" menu item of the Díjnet account, users are provided the opportunity to make donations to certain organizations by using the bank card service described in point 2.3.2 of this Policy. Donations can be paid without forwarding the user information specified in this point.

*The purpose of data processing:* providing financial support to specific organizations.

*The legal basis of data processing:* data processing is necessary for the performance of the contract [Article 6(1)(b) of the GDPR].

*The type of personal data processed:* identification number, date, time, email address, name, the name of the supported organization, the amount donated.

*Data transfer:*

- ✓ the payment identifier, the transaction date, time, and amount, the bank card identifier, and the bank card unique identifier are forwarded to OTP Mobil Kft. (1143 Budapest, Hungária krt. 17-19.), which provides the bank card payment process;
- ✓ if separate consent is given: name, email address, and the amount of the donation is forwarded to the supported organization.

*The legal basis of the data transfer:* data processing is necessary for the performance of the contract [Article 6(1)(b) of the GDPR]; the data subject's voluntary consent [Article 6(1)(a) of the GDPR].

## 2.4. THE DÍJNET NEWSLETTER

Based on user data, Díjnet Zrt. provides tailored messages pertaining to its own business offers and the business offers of its partners in connection with services, information, sweepstakes, and other sales events, to the parties who grant their explicit consent. Consent can be given to Díjnet Zrt. when registering for the Díjnet service or in the "User data / Manage my consent" menu item after logging in to the Díjnet account.

*The purpose of data processing:* sending email newsletters to interested parties concerning services, information, sweepstakes, and other sales events, which also contain the business offers of the Controller and its partners, tailoring these newsletters, direct marketing, contact, and forwarding the Controller's own offers.

*The legal basis of data processing:* the data subject's voluntary consent [Article 6(1)(a) of the GDPR].

*The type of personal data processed:* identification number, date, time, email address, name, consent for contact for direct marketing purposes.

*The duration of data processing:*

- ✓ until the management of the user's withdrawal of consent within 30 days, but for no more than
- ✓ 24 months from the last time the user opened a newsletter or updated his/her data.

*Possible consequences of failure to provide data reporting:* the data subject is not informed of the Controller's information or offers.

*The consent given for forwarding direct marketing messages can be withdrawn and requests for the deletion or rectification of personal data can be requested at the following points of contact:*

- ✓ on the [www.dijnet.hu](http://www.dijnet.hu) site, under the "User data / Manage my consent" menu item after logging in to the Díjnet account,

- ✓ via email sent to the [ugyfelszolgalat@dijnet.hu](mailto:ugyfelszolgalat@dijnet.hu) address, or
- ✓ via letter mailed to Díjnet Zrt. 1117 Budapest, Budafoki út 107-109.



## ***CONTACT***

### **2.5. CORRESPONDENCE WITH DÍJNET**

If you would like to contact Díjnet Zrt., you can use the contact information provided in this Policy or on the website, by using the form under the “Comments and complaints” menu item after logging in to the Díjnet account, on Díjnet’s social media sites ([www.facebook.com/dijnnet/](http://www.facebook.com/dijnnet/)), or using Facebook Messenger.

The [Facebook Data Policy](#) provides detailed information on data processing in connection with data processing on the Facebook site and with the Messenger application.

The data processing on the [www.facebook.com/dijnnet](http://www.facebook.com/dijnnet) site is carried out jointly by Díjnet Zrt. and Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland). The [Data Policy appendix to the Facebook Page Insights function](#) provides detailed information on the details of the joint data processing.

After no more than five years from the time of disclosure, Díjnet deletes all emails it received, including the sender’s name, email address, and phone number, the date and time, and any other personal data included in the message.

*The purpose of data processing:* contact and replies to contact by users.

*The legal basis of data processing:* the data subject’s voluntary consent [Article 6(1)(a) of the GDPR].

*The type of personal data processed:* identification number, date, time, name, phone number, email address, and the topic and text of the message.

The duration of data processing:

- ✓ five years from the time of disclosure.

*Possible consequences of failure to provide data reporting:* the data subject is unable to contact the Controller.



## ***OTHER DATA PROCESSING***

We will provide information on any types of data processing not listed in this Policy.

We hereby inform our clients that courts, prosecutors, investigating authorities, authorities dealing with administrative offences, administrative authorities, the Nemzeti Adatvédelmi és Információszabadság Hatóság [Hungarian National Authority for Data Protection and Freedom of Information], and, based on the power provided by law, other bodies may contact the Controller for the purposes of receiving information, the disclosure or transfer of data, and making documents available.

If the authority has indicated the exact purpose and the sphere of data, Díjnet shall disclose only the amount and scope of personal data to the authority that is essential for realizing the purpose of the contact.

### 3. THE METHOD FOR STORING PERSONAL DATA, THE SECURITY OF DATA PROCESSING

Taking into account the state of the art, the costs of implementation, the nature, scope, circumstances, and purpose of data processing, and the risks of variable probability and severity reported for the rights and freedoms of private persons, Díjnet and its processors put suitable technical and organizational measures in place in the interest of guaranteeing a suitable level of data security in line with the degree of risk.

Díjnet selects and operates the IT tools used for the processing of personal data during the course of providing the service in a manner that ensures that the processed data:

- a) are accessible to the authorized persons (availability);
- b) are authentic and certified (authenticity of data processing);
- c) can be certified as unchanged (data integrity);
- d) is protected against unauthorized access (data confidentiality).

Díjnet uses suitable measures to protect the data, thus especially from unauthorized access, alteration, forwarding, disclosure, deletion, destruction, unintentional destruction, damages, and inaccessibility due to changes to applied technologies.

In the interest of protecting the data files stored in its various electronic records, Díjnet uses suitable technical solutions to ensure that the stored data cannot (unless permitted by law) be directly combined and traced back to the data subject.

In line with the respective state of the art, Díjnet uses technical and organizational measures to protect the security of data processing which provides a level of protection that corresponds to the risks incurred in connection with data processing.

During the course of data processing, Díjnet preserves

- a) confidentiality: it protects the information so only authorized persons can access it;
- b) integrity: it protects the accuracy and entirety of the information and the processing method;
- c) availability: it ensures that when the authorized user so requires, it can access the desired information and the tools necessary therefor are available.

The IT system and network used by Díjnet and its partners are protected against computer-based fraud, espionage, sabotage, vandalism, fire, flood, computer viruses, hacking, and attacks aimed at refusal of service. The operator uses server and application-level protection procedures to ensure security.

We would like to inform users that electronic messages forwarded over the internet are, regardless of protocol (email, web, ftp, etc.), are vulnerable to threats that lead to unfair activities, contractual disputes, or the disclosure or amendment of information. The Controller takes all the precautions that can be expected of it to provide protection against such threats. It monitors the systems in the interest of recording all security deviations and providing evidence in connection with all security incidents. Additionally, system monitoring makes it possible to check the effectiveness of the applied precautions.

As Controller, Díjnet keeps records of any possible data protection incidents, including the facts in connection with the data protection incident, their effects, and the measures taken to remedy those.

Díjnet will, without delay and, if possible, no later than 72 hours after having learned of the data protection incident, report any data protection incidents to the Hungarian National

Authority for Data Protection and Freedom of Information, unless the data protection incident is assumed to not have any risks pertaining to the rights and obligations of any natural persons.

The security of data processing that takes place outside the European Union:

*As regards the data processed by Díjnet*

- ✓ in case of using the services of Google Analytics and Tag Manager, data forwarding to Google LLC (1600 Amphitheatre Parkway, Mountain View, CA, 94043, United States of America), acting as data processor, is, as set out in its GTC valid as of August 12, 2020, compliant with Article 46(2)(d) of the GDPR, i.e. general data protection conditions approved by the supervisory authority and the European Commission. If the European Commission finds that the suitable protection of personal data is guaranteed, data may be forwarded under the GTC.

## 4. THE DATA AND CONTACT INFORMATION OF THE DATA PROCESSOR

Name: Díjnet Zrt.

Registered seat: 1117 Budapest, Budafoki út 107-109.

Company registration number: 01-10-045817

Name of the court of registration: Metropolitan Court of Budapest, as Court of Registry

Tax number: 14113765-2-43

Email: [info@dijnet.hu](mailto:info@dijnet.hu)

Data Protection Officer: [gdpr@dijnet.hu](mailto:gdpr@dijnet.hu)

## 5. DATA SUBJECT RIGHTS AND POSSIBILITIES FOR LEGAL REMEDY

The data subject may request information on the processing of its personal data and may request that its personal data be rectified or – with the exception of the cases where data processing is compulsory – erased, its consent be withdrawn, data processing be restricted, and may exercise its right of data portability and objection, in the manner indicated at the time the data was recorded, at the Controller's above contact information and through customer service.

### Right to request information:

At the data subject's request, Díjnet shall take appropriate measures to provide the data subject with all the information under Articles 13 and 14 of the GDPR pertaining to the processing of personal data and the information under Articles 15-22 and 34 in a transparent, intelligible and easily accessible form, using clear and plain language.

### Right of access:

The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; the envisaged period for which the personal data will be stored; the right to request rectification or erasure of personal data or restriction of processing; the right to lodge a complaint with a supervisory authority; any available information as to the source of personal data; the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Where personal data are forwarded to a third country or an international organization, the data subject is entitled to receive information on the suitable guarantees pertaining to such forwarding.

Díjnet shall make a copy of the personal data subject to data processing available to the data subject. The Controller may charge the data subject a reasonable fee based on administrative costs for any additional copies requested. At the request of the data subject, Díjnet shall provide such information in electronic format.

The right to information may be exercised in writing by way of the channels specified in the Introduction and point 4.

At the data subject's request, information may also be provided verbally, after the credible identification of identity.

### Right to rectification:

The data subject may request the rectification of any incorrect personal data processed by Díjnet pertaining to the data subject, and the supplementation of any incomplete data.

### Right to erasure:

If any of the reasons are met, the data subject may obtain from Díjnet the erasure of personal data concerning him or her without undue delay:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

- b) the data subject withdraws consent on which processing is based and there are no other legal grounds for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

The erasure of the data may not be initiated to the extent that processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller; for reasons of public interest in the area of public health for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or for the establishment, exercise or defense of legal claims.

*Right to restriction of processing:*

The data subject shall have the right to obtain from Díjnet restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the 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 Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the Controller override those of the data subject.

Where processing has been restricted, the personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense 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.

Díjnet shall inform the data subject before the restriction of processing is lifted.

*Right to data portability:*

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and to transmit those data to another controller.

*The right to object:*

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which 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 or for the purposes of the legitimate interests pursued by the Controller or by a third party, including profiling based on those provisions.

In case of an objection, the Controller shall no longer process the personal data unless there are compelling legitimate grounds for the processing which override the interests,

rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the data subject objects to processing for direct marketing purposes, Díjnet will no longer process the personal data for such purposes.

#### Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above right shall not apply if the processing

- a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- b) is authorized by Union or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c) is based on the data subject's explicit consent.

#### Right to withdraw consent

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

#### Procedural rules

The Controller shall provide information on action taken on a request under Articles 15 to 22 of the GDPR to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

The Controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means unless otherwise requested by the data subject.

If the Controller does not take action on the request of the data subject, the Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Díjnet shall provide the requested information free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request.

The Controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject about those recipients if the data subject requests it.

The Controller shall provide a copy of the personal data undergoing processing. The Controller may charge the data subject a reasonable fee based on administrative costs for any

additional copies requested. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in an electronic format.

Compensation and restitution:

Any person who has suffered material or non-material damage as a result of an infringement of the Data Protection Regulation shall have the right to receive compensation from the Controller or processor for the damage suffered. A processor shall be liable for the damage caused by processing only where it has not complied with obligations of law specifically directed to processors or where it has acted outside or contrary to lawful instructions of the Controller.

Where more than one controller or processor, or both a controller and a processor, are involved in the same processing and where they are responsible for any damage caused by processing, each controller or processor shall be held liable for the entire damages.

A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

Complaints lodged at the data protection auditor:

If you have any complaints regarding data processing by Díjnet, please turn to our data protection auditor: [www.ppos.hu/audit](http://www.ppos.hu/audit)

Right to turn to court:

Data subjects whose rights have been violated may turn to a court of law against the Controller (with jurisdiction at the registered seat of the defendant or at the data subject's home address, at the data subject's discretion). The court shall review the case in an expedited procedure. Lawsuits launched for the protection of personal data are duty-free.

Procedures of the data protection authority:

Complaint may be filed at the Hungarian National Authority for Data Protection and Freedom of Information:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság [Hungarian National Authority for Data Protection and Freedom of Information]

Registered seat: H-1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf.: 9.

Phone: +36 (1) 391-1400

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

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Data protection - <http://www.ppos.hu>

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