



Privacy Notice

about the personal data processed in the course of the conclusion and performance of the Data Controller's contracts and the related contact

1. Name of the Data Controller

Name: KÁRPÁT Vasút Korlátolt Felelősségű Társaság (hereinafter referred to as: KÁRPÁT Vasút Kft. or Data Controller)

Tax number: 14173848-2-13

Registered office and postal address: 1103 Budapest, Gyömrői út 115.

Phone: +36 70 615 55 54

E-mail: diszpecser@karpatvasut.hu

Contact details of the Data Protection Officer of KÁRPÁT Vasút Kft: adatvedelem@karpatvasut.eu

2. Description of data processing

The Data Controller records the personal data of the representatives of the non-natural person Client who is contracted with the Controller, the contact persons designated by the contracting Party and other contributors in the contract to be concluded with the partner for the purpose specified in this notice. For the purpose of complying with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter: GDPR), the Data Controller shall provide all natural persons who are entitled to represent as persons within the framework of the legal relationship established between the Data Controller and its contractual partners, as a contact person or in any other capacity, the Data Controller (hereinafter referred to as the Data Subjects), and within the framework of this Notice, the Data Controller provides them with information on the most important characteristics and circumstances of the data processing carried out by the Data Controller.

The terms used in this information are to be interpreted in accordance with the terms defined in Article 4 of the GDPR and supplemented by Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Privacy Act).

3. Purposes Related to Data Processing

In the case of the preparation and conclusion of the contract and the fulfilment of the provisions of the contract, as well as the communication between the Data Controller and the contracting party in connection with the agreement, as well as the settlement of any legal disputes related to the agreement, the purpose of data processing is to identify the persons acting on behalf of the contracting party and to provide their contact information to the Data Controller (hereinafter: Data processing purpose No. 1).

The Data Controller shall retain the documents qualifying as accounting documents until 8 years have passed from the date of issue of the document. If such an accounting document contains the personal data of a person participating in the performance of the contract, the purpose of data processing is the fulfilment of the Data Controller's obligation to retain the said document (hereinafter: Data Processing Purpose No. 2).

4. Legal basis for data processing

The processing for Data processing purpose No. 1 is carried out on the basis of Article 6(1)(f) of Regulation (EU) 2016/679 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 (hereinafter referred to as the GDPR), given that the processing is necessary for the purposes of the legitimate interests pursued by the controller and third parties.

- In the case of the person entitled to represent and the person entitled to certify performance, the legitimate interest is to reduce business risks by ensuring the conclusion of a valid contract, and to check the right of representation and the legality of representation.
- In the case of the contractual contact data of the partner, the data processing is carried out in the legitimate interest of the Data Controller and the contracting partner as a third party. This legitimate interest is to maintain a smoother relationship with the contractual partner in order to fulfil the contract.

As a Data Subject, you have the right to object to the processing of your personal data on the basis of the legal basis of legitimate interest, according to which you may object to the processing of your personal data at any time for reasons related to your particular situation.

Please note that detailed information on the right to object is **available in the section of this Privacy Policy under** the heading Rights of Data Subjects in Relation to Data Processing

Processing for Data processing purpose No. 2 pursuant to Article 6(1)(c) of the GDPR is necessary for compliance with a legal obligation to which the controller is subject. This obligation is regulated by Section 169 of Act C of 2000 on Accounting. for the Data Controller.

5. Scope of processed data

Persons Affected by Data Processing:	Scope of Processed Personal Data:
the person acting on behalf of the party contracting with the Data Controller and entitled to sign the contract	<ul style="list-style-type: none"> • name • position • notification address, telephone number, e-mail address, • signature.
a person designated by the party contracting with the Data Controller as a certificate of performance, as a contact person, or participating in or contributing to the performance of the contract in any other way	<ul style="list-style-type: none"> • name • position • notification address, telephone number, e-mail address.

Data Retention Period:

The personal data recorded in the contract shall be processed by the Data Controller for Data processing purpose No. 1 until 5 years have passed from the termination of the legal relationship, after which the contract and the data contained therein shall be destroyed.

The personal data contained in the invoices and certificates of performance generated in connection with the performance of the contract and in the closely related background documentation shall be

processed for the Data processing purpose No. 2 until 8 years have passed from the issuance of the above-mentioned documents as accounting documents.

Source of Personal Data:

If the contract is not concluded with a natural person, the data of the person authorised to represent the contracting party will be recorded on the basis of the information in the effective company/register. The personal data of the natural person designated as the contact person and other contributors shall be made available to the Data Controller by the contracting party.

Recipients:

Data processors

- the provider of the host and the e-mail system:
Name: TRENDX – TEAM Kft
Address: 1042 Budapest, Árpád út 155, 4/12
Contact: attilad@pannonmail.hu
- The company operating the invoicing system:
Name: PC Trade Systems Kft.
Address: 6728 Szeged, Back Bernát u. 2.
Contact: www.pctarde.hu , info@pctrade.hu

6. Rights of the Data Subject in Relation to the Processing of Their Personal Data

In the course of its data processing activities, the Data Controller respects your rights as a Data Subject, in the course of which it processes your personal data in accordance with the effective legal provisions. With this in mind, it guarantees the enforcement of the provisions of the GDPR and the supplementary provisions of the Info Act, as well as the provisions of the sectoral legislation relating to data processing relating to the specific purpose of data processing.

The security of the personal data provided is protected by possible and necessary technical and organizational measures. In doing so, the Data Controller pays particular attention to ensuring the confidentiality, integrity, and availability of personal data.

What are Your Data Subject Rights in Connection with the Data Processing Carried out by the Data Controller?

With regard to the Applicant's request related to the exercise of the Applicant's rights as a Data Subject (provided that the deadline for performance is not extended in accordance with the GDPR), the Data Controller will comply with your request or request without undue delay after receipt, but not later than within one month, and will inform you thereof.

The Applicant is entitled to the rights of the Data Subject specified and enforceable in relation to the specific, individual data processing purposes specified in this Privacy Notice as follows.

Right of Information and Access

The Data Subject shall have the right to receive feedback from KÁRPÁT Vasút Kft on whether the processing of his or her personal data is in progress and, if such data processing is in progress, to obtain access to the following:

- the personal data processed,
- the categories of personal data concerned,
- the purposes of data processing,
- the recipients or categories of recipients to whom the personal data have been or will be disclosed by KÁRPÁT Vasút Kft,
- where applicable, the envisaged period for which the personal data will be stored or, if this is not possible, the criteria for determining that period.
- the information that the Data Subject may request from KÁRPÁT Vasút Kft the rectification, deletion or restriction of the processing of personal data concerning him or her, and may object to the processing of such personal data,
- the information of the right to lodge a complaint with a supervisory authority;
- if the data were not collected by KÁRPÁT Vasút Kft from the Data Subject, then all available information on their source,
- the fact of automated decision-making (including profiling) and the logic used in these cases and the significance of such processing for the Data Subject.

Right to Rectification

The Data Subject shall have the right to request that KÁRPÁT Vasút Kft rectify the inaccurate personal data concerning him or her without undue delay, and he/she shall have the right to request the completion of incomplete personal data, taking into account the purpose of data processing, including by means of a supplementary statement.

Right to Erasure

The Data Subject may request that KÁRPÁT Vasút Kft delete the personal data concerning him or her without undue delay, if:

- the personal data is no longer needed by KÁRPÁT Vasút Kft for the purpose from which they were collected or otherwise processed,
- the Data Subject withdraws his/her consent and there is no other legal basis for the data processing,
- the Data Subject objects to the data processing and there is no overriding legitimate reason for the data processing,
- the personal data have been unlawfully processed,
- the personal data must be deleted in order to comply with a legal obligation concerning KÁRPÁT Vasút Kft,
- personal data was collected in connection with the provision of information society services.

Right to Blocking (Restriction of Processing)

The Data Subject shall have the right to request KÁRPÁT Vasút Kft to restrict data processing if at least one of the following applies:

- the Data Subject contests the accuracy of the personal data,
- the processing is unlawful and the Data Subject opposes the deletion of the data, instead requesting the restriction of their use,



- KÁRPÁT Vasút Kft no longer needs the personal data for the purpose of data processing, but the Data Subject requires them for the establishment, enforcement or defence of legal claims,
- the Data Subject has objected to the data processing, in which case the restriction shall apply for the period until it is established whether the legitimate reasons of KÁRPÁT Vasút Kft take precedence over the legitimate reasons of the Data Subject.

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 KÁRPÁT Vasút Kft, in a structured, widely machine-readable format, and shall be entitled to transmit these data to another Data Controller without hindrance from KÁRPÁT Vasút Kft.

No automated decision-making or profiling takes place during data processing.

Right to Remedy

If you have any questions or complaints about this data processing, please contact KÁRPÁT Vasút Kft at the adatvedelem@karpatvasut.eu email address.

In the case of any request for the exercise of the right of the Data Subject, KÁRPÁT Vasút Kft shall inform the Data Subject of the measures taken in response to the request without undue delay, but no later than within one month from the receipt of the request. If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by a further two months. However, KÁRPÁT Vasút Kft will inform the Data Subject of the extension of the deadline within one month of the receipt of the request. If you do not wish to file a complaint with KÁRPÁT Vasút Kft, you may use the following legal remedy.

Contact details of the National Authority for Data Protection and Freedom of Information as the data protection supervisory authority:

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf.: 9.

Telephone number: 06 1/391-1400 Fax: 06 1/391-1410

Website: www.naih.hu

This Privacy Notice is effective from: 15.04.2025.

**KÁRPÁT Vasút Kft
Data Controller**