

## Privacy Notice

for inquiries via the contact form available on the website of KÁRPÁT Vasút Kft.

### 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

### 2. Contact details of the Data Protection Officer

Contact details of the Data Protection Officer of KÁRPÁT Vasút Kft:  
[adatvedelem@karpatvasut.eu](mailto:adatvedelem@karpatvasut.eu)

### 3. Description of Data Processing

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), for all natural persons who contact through the contact channels displayed on the Controller's website, their personal data are made available to the Data Controller (hereinafter referred to as the Data Subjects) on the form placed on the website, 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).

Name of the Data Processing Activity:	
Data processing related to contacting the Data Controller	
<b>Purpose of Data Processing</b>	The Data Subject has the opportunity to contact the Data Controller with a general question or request information in connection with a specific service by sending an e-mail to the e-mail address published on the website or by calling through the phone number displayed there. The processing of your personal data necessary for this purpose is carried out for the purpose of receiving and registering your inquiry and responding to it.
<b>Legal basis for data processing</b>	The legal basis for the processing of the data for the purpose presented in this document is Article 6(1)(a) of the GDPR, on the basis of which you, as a Data Subject, have given your

	<p>consent to the processing of your personal data for this purpose.</p> <p>In the course of your request, you may disclose personal data to the Data Controller that is also considered sensitive personal data and is considered relevant to the request, in which case the additional legal basis for the processing of sensitive personal data is your explicit consent to the processing of such personal data for one or more specific purposes pursuant to Article 9(2)(a) of the GDPR. Please disclose special personal data to the Data Controller only for reasons directly related to your request and for an absolutely necessary reason, otherwise the Data Controller will delete such personal data immediately after recognizing that the data concerned is not needed for the purpose of this data processing.</p> <p>The Data Controller shall give its consent by its explicit and active conduct by contacting the Data Controller through one of the contact channels published by the Data Controller and disclosing personal data to it within the framework of the contact channels.</p> <p>We inform you that your consent to the processing of personal data may be withdrawn at any time and without justification, which, however, does not affect the lawfulness of the data processing carried out before the withdrawal - on the basis of the consent.</p> <p>The revocation of your consent will result in the Data Controller having to delete your request from its records, which it will not be able to respond to thereafter.</p>
<b>Categories of personal data covered</b>	<p>For the purpose of this data processing, the Data Controller will handle any of the following data:</p> <ul style="list-style-type: none"> <li>• name (title/surname/first name),</li> <li>• depending on the channel used as a means of contact, your e-mail address/phone number,</li> <li>• the subject and time of the request,</li> <li>• the data/information that is considered personal data to be included in the content of the request.</li> </ul> <p>We inform you that the Data Controller will only use the personal data provided by you that are directly related to your inquiry and are absolutely necessary to handle/to answer.</p>
<b>Duration of data storage</b>	<p>The Data Controller shall provide the personal data provided by you for the purposes presented in this document for the duration specified below:</p> <ul style="list-style-type: none"> <li>• until your consent is withdrawn,</li> <li>• in the absence of withdrawal of your consent (i.e. if you do not decide to withdraw your consent to data processing after sending the request, but before receiving the reply</li> </ul>

	prepared for you), the data processing will continue until the request has been fully answered, after which all personal data will be deleted.
<b>Recipients of personal data and who may have access to personal data</b>	<p>The personal data processed for this purpose are only accessible to KÁRPÁT Vasút Kft as Data Controller, however, in order to receive and fulfil the requests, it uses the assistance of the following data processors:</p> <ul style="list-style-type: none"> <li>the provider of the host and e-mail system:</li> </ul> <p>Name: TRENDX – TEAM Kft. address: 1042 Budapest, Árpád út 155, 4/12 Contact: attilad@pannonmail.hu</p>

#### **4. 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](mailto: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](http://www.naih.hu)

This Privacy Notice is effective from: 15.04.2025.

**KÁRPÁT Vasút Kft**  
**Data Controller**