

Privacy Notice Regarding Cookies Used on the Website

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

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

KÁRPÁT Vasút Kft. On the www.karpatvasut.hu website operated by it (hereinafter referred to as the website), it uses so-called cookies, the use of which is used to process personal data. The purpose of this notice is to provide detailed information to the persons visiting the website (hereinafter referred to as: data subjects) about the types of cookies operating on the Data Controller, in particular on its website, their purpose, the method of granting and withdrawing consent related to the use of cookies, the types of personal data processed by the cookie and the duration of their processing, as well as the rights of the data subject and the possibilities of enforcing their rights in connection with the processing of the cookie.

The data protection terms used in this notice are defined in Article 4 of 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 referred to as the GDPR), as well as Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Privacy Act.) supplemented by the Rules.

About cookies in general:

A cookie is a small data file that is placed on the user's computer or device used for browsing when the user visits a website, in this case the website of the Data Controller. This file is located in the source code of the website and is downloaded during browsing and then stored in the browser.

The purpose of cookies is to facilitate the use of the website, to help improve the user experience and to provide an effective source of information. In addition, cookies enable the Data Controller – as the operator of the website – to monitor the operation of the website, to prevent misuse, and to provide services without interruption and at an appropriate level.

Cookies have multiple functions and can be used for a variety of purposes, such as:

- collect information about the user and the device they are using;
- remember certain individual settings of the user;

- They may help optimize and target advertising content on the website and other websites.

Basic information on the circumstances of data processing

Accepting and allowing the use of cookies is not mandatory for all cookies. The data subject can refuse the use of cookies based on his or her consent through the settings of his or her computer or other device used for browsing, or through the settings of the browser used to access the website. There are also cookies that are essential for the smooth operation of the website, so they are installed on the data subject's device without the consent of the data subject. We inform you that the Data Controller does not have access to the data/information stored on the data subject's device in any way.

The party that places the cookie can be:

- The Data Controller: these cookies are placed directly on the Data Controller's website, and the information stored in them is only accessible to the Data Controller.

Third party: The so-called "third-party" cookies may not be placed on the website by the Data Controller, but by external service providers, such as analytics or advertising partners (e.g. Google, Meta). These cookies enable functions such as analysing website usage (e.g. visitor statistics) or displaying personalised content and offers.

The use of these cookies aims to improve the user experience, for example by helping service providers understand how visitors use the site or to display more relevant information to them.

The data collected by such cookies is processed exclusively by the relevant third-party service provider in accordance with its own privacy policy. The Data Controller does not have access to these data and does not process them.

Types of cookies used on the Data Controller's websites:

Detailed and up-to-date information about cookies is available in a pop-up window that appears again during the first visit to the website or after deleting the browser's cookie settings. The "Set permissions" menu item of the pop-up window and this cookie information provide information about the operation, types, storage period of the cookies used on the website, and the service providers who place them.

On the cookie setting interface (through the CookieYes system), with the **exception of cookies that are necessary for the operation of the website in the "Necessary" category**, the user can refuse the use of non-necessary cookies at any time. Rejected cookies will no longer collect or process any data about the user. In the same way, the user can re-consent to the use of consent-based cookies at any time.

Detailed information on the management of cookies is available on the cookie management interface (as shown in Figure 1), in the menu items located there.

Customise Consent Preferences

We use cookies to help you navigate efficiently and perform certain functions. You will find detailed information about all cookies under each consent category below.

The cookies that are categorised as "Necessary" are stored on your browser as they are essential for enabling the basic functionalities of the site. ... [Show more](#)

> Necessary

Always Active

Necessary cookies are required to enable the basic features of this site, such as providing secure log-in or adjusting your consent preferences. These cookies do not store any personally identifiable data.

> Functional

Functional cookies help perform certain functionalities like sharing the content of the website on social media platforms, collecting feedback, and other third-party features.

Reject All

Save My Preferences

Accept All

Powered by **CookieYes**

Figure 1

You can withdraw your consent to the previous processing at any time by clicking on the icon below in the lower left corner of the website, during which the pop-up window will become available again and you can change your cookie settings on it. (Figure 2)



Figure 2

The consent given for data processing may be withdrawn at any time, however, the withdrawal shall not affect the lawfulness of the data processing carried out on the basis of the consent prior to its withdrawal.

If you wish to contact us in relation to your consent previously given (e.g. to withdraw your consent, request information or exercise other data subject rights), please indicate the time of your visit, **the type of browser you are using or the type of device used on the website** (e.g. mobile, laptop) so that we can identify your consent.

Please note that the website does not automatically display a unique Consent ID, but consent logging is recorded in our internal system. By providing the minimum technical data required for identification, we can examine your request and ensure your rights as a data subject.

The purposes of the operation of each type of cookie used on the website:

☐ **Essential (necessary) cookies**

These cookies are necessary for the smooth technical and technical operation of the website. The Data Controller uses these cookies exclusively for the purpose of facilitating the proper operation of the website.

☐ **Statistical (analytical) cookies**

With the help of these cookies, the Data Controller collects information about the users' behaviour on the website in order to continuously develop and optimise the operation of the website and to improve the user experience.

☐ **Marketing cookies**

These cookies allow the Data Controller to display personalized offers and to promote its products and services in a targeted manner. Marketing cookies can be used to display relevant advertisements to users on the website and other interfaces.

☐ **Preference cookies (related to settings)**

These cookies allow the website to remember the settings you have chosen (e.g. language, region) and to personalize the appearance or functionality accordingly.

Data processed by cookies:

Cookies collect information that can be linked to the user or the computer, device or browser they are using. A detailed description of the data collected by each type of cookie is available in the pop-up window shown in Figure 1, by clicking on the respective cookie type.

Please note that third parties providing cookies (e.g. Google, Meta, etc.) may change the scope of data they process from time to time. Therefore, the Data Controller can provide you with the most accurate and up-to-date information in the above-mentioned way, through the pop-up window.

Legal basis for managing each type of cookie

The legal basis for the use of essential (necessary) cookies is the legitimate interest of the Data Controller in accordance with Article 6(1)(f) of the GDPR, which serves to ensure the technical operation of the website. Without the use of such cookies, some of the basic functions of the website would not be available, so this legitimate interest is justified and does not require separate consent from the user.

Certain essential cookies may be placed by third-party service providers (e.g. Google or CookieYes Limited):

We would like to inform you that in the case of data processing where the legal basis for the data processing is a legitimate interest pursuant to Article 6 (1) f) of the GDPR, the data subject has the right to exercise his or her right to object as defined in Article 21 of the GDPR in the form of an **e-mail sent to** the adatvedelem@karpatvasut.eu email address before the start of data processing and during each stage of data processing.

The legal basis for the use of cookies for setting purposes as well as for statistical and marketing purposes is the voluntary and explicit consent of the data subject to data processing in

accordance with Article 6(1)(a) of the GDPR. Please note that you may withdraw your consent at any time without giving any reason, but this withdrawal will not affect the legality of any consent given prior to its withdrawal. Without your consent, the website will not monitor your activity on the website for statistical and marketing purposes.

Data transfers to third countries

In the case of some cookies placed and used by third parties on the website, the personal data contained in the cookies may be transferred outside the European Economic Area (EEA). Detailed information about the handling of third-party cookies (in a pop-up window) can be found in the description of each cookie, which can inform the data subject about how third parties process the data subject's personal data.

II. Rights related to data processing and the possibilities of enforcing rights

Rights of the data subject in relation to the processing of their personal data

The data subject's request or request related to the exercise of the data controller's rights related to the data processing activities described in this cookie notice shall be fulfilled without undue delay, but in any event not later than one month after receipt, unless this deadline is extended by a further two months due to the complexity of the request or the number of requests. The Data Controller shall inform the data subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay.

The data subject can change the settings of the settings cookies, as well as the settings of the statistical and marketing cookies at any time within the pop-up window of the website (CookieYes), see Figure 1. In addition, the data subject can use the "Do not track" function in his or her browser at any time. In the most commonly used browser types, this feature can be set in the following places.

Settings / Privacy and Security / Third-party cookies – “Do Not Track”
Settings / Privacy and Security / Third-party cookies – “Block third-party cookies”

In all cases, the data subject has the right to information and access, on the basis of which the data subject is entitled to receive feedback from the Data Controller on whether the processing of his or her personal data is in progress and, if such data processing is in progress, to have access to the following:

- to the personal data processed,
- the categories of personal data concerned,
- for the purposes of data processing,
- to the recipients or categories of recipients to whom the Data Controller has disclosed or will disclose the personal data,
- 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 the Data Controller to rectify, delete or restrict the processing of personal data concerning him or her, and may object to the processing of such personal data.
- to inform you of the right to lodge a complaint with a supervisory authority;
- if the data were not collected 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.

The data subject has the right to object to the use of essential cookies during the commencement of data processing and throughout its lifetime, on the basis of which the data subject has the right to object at any time to the processing of his or her personal data on the basis of legitimate interest for reasons related to his or her own situation. In this case, the Data Controller may no longer process the personal data, unless the Data Controller proves that the data processing is justified by compelling legitimate interests that take precedence over the interests, rights and freedoms of the data subject, or that are related to the submission, exercise or defence of legal claims.

With regard to this data processing, the data subject may exercise his or her right to erasure, on the basis of which the data subject may request that the Data Controller erase the personal data concerning him or her without undue delay, if

- the personal data is no longer needed by the Data Controller for the purpose for 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 erased in order to comply with a legal obligation to which the Data Controller is subject,
- Personal data was collected in connection with the provision of information society services.

Possibilities for the data subject to enforce their rights in relation to this data processing

If you consider the way the Data Controller handles your personal data to be injurious, we recommend that you first contact one of the Contact Details provided by the Data Controller at the beginning of this information or contact the Data Protection Officer. We will always investigate your complaint and do everything we can to handle it appropriately. If, despite your complaint, you continue to object to the way the Data Controller processes your personal data, you may use the following legal remedies.

Right to lodge a complaint with a supervisory authority:

Without prejudice to any other administrative or judicial remedies, each data subject shall have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information if he or she believes that the Data Controller or the data processor commissioned by him or her has committed an infringement or caused a threat thereof.

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 Notice is effective from: 22. 05. 2025.

KÁRPÁT Vasút Kft
Data Controller