

Privacy Notice

Pursuant to Directive 95/46/EC of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and Regulation (EU) 2016/679 repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as "GDPR"), as well as to Act CXII of 2011 on the right of informational self-determination and on the freedom of information (hereinafter referred to as "Information Act"), Paksi Közlekedési Kft. (hereinafter referred to as the "Company") hereby provides the following report (hereinafter referred to as "Privacy Notice").

Paksi Közlekedési Kft. makes every effort to fully comply, on the website (hereinafter referred to the "Website") it operates, with the current data protection rules. Accordingly, the following data protection provisions apply to the use of its services, as well as to the data processing issues arising during the use of the Website:

Data of the Data Controller:

Name of the data controller:	Paksi Közlekedési Kft.
Address of the data controller and place of data processing	H-7030, Dózsa György út 55-61., Paks, Hungary
Name of data protection officer	Rita Kósa
Email address of data protection officer	kosa.rita@paksbusz.hu
Telephone no. of data protection officer	+36 70/645-8200

Independent Processing

1. Processing Related to Job Applicants' Data

The process of applying for a job at the Company:

Members of the competent professional leadership are responsible for the selection of the appropriate applicants, so they are obliged to ensure the rights of the data subjects in cooperation with the Company's internal data protection officer in the performance of the tasks related to this type of data processing.

With regard to résumés containing personal data lodged for the purpose of applying for a job (hereinafter referred to as "CV"), the Company does not differentiate between the manner of their delivery, i.e. CVs received on paper or electronically are treated equally.

As a general rule, CVs are categorized by the Company for later use, and a database is built from them as a reserve list to fill any subsequent vacant post. The Company will destroy the data entered in the database after one year. It responds to each job application received via a reply

letter, in which it informs the applicant in writing about the fact of data processing, the legal grounds for data processing and the forms of exercising the right to object the processing.

CVs and the personal data contained therein are processed by the Company in accordance with its Privacy Policy.

Purpose of processing:	Selection of suitable prospective employees to fill subsequent vacancies and processing of the candidates' personal data.
Scope of data processed:	<ul style="list-style-type: none"> • Name • Date of birth • Mother's name • Address • Qualifications data • Photo • Other data provided by the data subject
Legal grounds for processing:	Consent of the data subject as per Section 5 (1) a) and Section 6 (6) of Information Act.
Data storage period:	One year for data entered in the database and two years for the interviewees' data.
Method of data storage:	Paper-based and electronic.
Source of personal data:	Data subject.
Scope of data subjects:	Applicants who submit their CVs to the Company.
Name of data processor:	Paksi Közlekedési Kft.
Address of data processor:	H7030, Dózsa György út 55-61., Paks, Hungary
Activities related to processing:	Labour administration.
Actual place of data management and processing:	H7030, Dózsa György út 55-61., Paks, Hungary
Data transfer:	No data transfer takes place in connection with the processing.

2. Processing in the Performance of a Public Mission

For passengers travelling on a pass, the issue of the pass card requires getting acquainted with certain personal data but, in relation to such data, no processing as per Information Act is carried out as the Company does not maintain records of the passengers holding passes.

The Company performs camera surveillance on an electronic security system on board of its buses. The Company performs processing of personal data (video recordings) that are subject to Section 8 of Act XLI of 2012 on Passenger Transport Services (hereinafter referred to as "Transport Services Act") as described below.

The Company may only record videos in areas that are owned or lawfully used by the Company, in places open to public traffic, and in vehicles used by the Company for passenger transportation services.

At the request of a court or authority, the Company is obliged to make the video recording requested available to the court or authority without delay.

Whenever the Company makes an investigation into the circumstances of an accident or incident involving persons using its services, users of the equipment it operates, its employees, agents and persons in any area under its management, as well as their luggage, vehicles, equipment and facilities, or if it investigates complaints received, the following rules apply to the retention of the video recordings taken. For the duration of such investigations, but not later than 60 days from the date of recording, the Company is released from the obligation to erase such recordings on the 16th day after the date of recording. Video recordings used for the purposes of an investigation should be erased on the 15th day after the investigation ends and the ensuing measures are taken, or after the decision passed to close the legal or official proceedings instituted in the case has become final.

Purpose of processing:	Protection of the Company's vehicles, including equipment, devices and passengers on board, and the lives and physical integrity of the Company's employees and agents, and of national property.
Scope of data processed:	Video recording.
Legal grounds for processing:	Consent of the data subject as per Article 6 (1) a) of GDPR and Section 8 of Transport Services Act.
Data storage period:	16 days from the time the video was recorded, unless it is used in court or official proceedings. A person whose rights or legitimate interests are affected by the recording may, by proving his/her rights or legitimate interests, request that the image not be erased by its controller as described above. If non-erasure has been requested by the data subject but no official request is received within 30 days thereafter, the video recording should be deleted.
Method of data storage:	Electronic.

Source of personal data:	Data subject.
Scope of data subjects:	Passengers availing themselves of the Company's passenger transport services.
Name of data processor:	Paksi Közlekedési Kft.
Address of data processor:	H-7030, Dózsa György út 55-61., Paks, Hungary
Activities related to processing:	Investigation of accidents and incidents, enhancement of public safety.
Actual place of data management and processing:	On the vehicle or on a central server, depending on the available technical capabilities.
Data transfer:	To courts and public authorities.

3. Processing Related to the Unauthorized Use of Public Transport Services

Pursuant to the authorization granted under Act XLI of 2012 on Passenger Transport Services (hereinafter referred to as "Transport Services Act"), the Company is entitled to perform data processing as described in the following.

"In connection with the performance of the passenger transport contract, the service provider and its agent shall have the right to access data necessary to identify passengers involved in the passenger service without paying a fare to verify their personal travel entitlements and to confirm the legality of the use of public service travel discounts." [Section 7 (1) of Transport Services Act]

According to Section 7 (4) of Transport Services Act, data access and processing rights of the Company or its agent cover the following data in order to perform the contract underlying the passenger transport service:

- Identification data of a natural person who uses the service without entitlement thereto:
 - surname and first name,
 - surname and first name at birth,
 - place and time of birth,
 - mother's surname and first name at birth,
 - address, residence,
 - type and number of the official identity card suitable for personal identification.
- For any travel discount provided by law, legal grounds for the discount, as well as the identifier, type, validity and issuer of the document substantiating the title.
- The service route for any travel discount subject to a service route and the time or period of validity for any discount valid for a specific time or period.

For a passenger travelling without a single ticket or with an invalid travel document or violating Travel Terms and Conditions, ticket inspectors record the data specified above in writing, on paper.

One of the documents completed in two copies is handed over to the passenger, the other signed copy will be kept until the case is settled or for the period specified by law.

If the passenger is not cooperative, the ticket inspector may request official assistance for data recording.

Recordings are entered into a database which is managed by our duly authorized employees.

Only duly authorized persons can have access to the data stored in the database. The processing of data related to unsettled cases covers a period of 3 to 5 years in accordance with the records management regulations specified by law.

Purpose of processing:	Recording and managing the data of passengers who do not have the right to travel on board the Company's scheduled local services.
Scope of data processed:	<ul style="list-style-type: none">• identification number of the ticket inspector;

	<ul style="list-style-type: none"> • number of bus service; • passenger's name; • place and date of birth; • mother's name; • ID card number; • residence card number; • number(s) of other certificate(s); • permanent address; • residence; • telephone number; • email address; • for a minor or incapacitated person: name, address and place of work of the guardian; • bus line number; • direction of travel; • place of inspection.
Legal grounds for processing:	Section 7 (1) of Travel Services Act.
Data storage period:	3 to 5 years as per the records management regulations.
Method of data storage:	Paper-based and electronic.
Source of personal data:	The data subject or the authority.
Scope of data subjects:	Natural persons who use the service without entitlement thereto.
Name of data processor:	Paksi Közlekedési Kft.
Address of data processor:	H-7030, Dózsa György út 55-61., Paks, Hungary
Activities related to processing:	Penalty fare administration.
Actual place of data management and processing:	H-7030, Dózsa György út 55-61., Paks, Hungary
Data transfer:	No data transfer takes place in connection with the processing.

4. Processing in Applications for Demand-driven Services

Our Company also operates so-called demand-driven services. You can request the service on the dedicated page of the Company's website by providing your name, telephone number and email address, as well as the service you intend to use and the date of the trip.

Purpose of processing:	Recording and processing of data required for the provision of demand-driven services requested of the Company.
Scope of data processed:	<ul style="list-style-type: none">• name,• telephone number,• email address.
Legal grounds for processing:	Consent of the data subject as per Section 5 (1) a) of Information Act.
Data storage period:	Until erasure is requested by the data subject.
Method of data storage:	Electronic.
Source of personal data:	The data subject.
Scope of data subjects:	Persons using demand-driven services.
Name of data processor:	Paksi Közlekedési Kft.
Address of data processor:	H-7030, Dózsa György út 55-61., Paks, Hungary
Activities related to processing:	Traffic administration.
Actual place of data management and processing:	H-7030, Dózsa György út 55-61., Paks, Hungary
Data transfer:	No data transfer takes place in connection with the processing.

5. Processing Related to Arrears Management

For arrears management purposes, the Company also processes, in the course of performing its service activities, the data of individuals with arrears.

The Company also conducts arrears management procedures vis-à-vis passengers who are subject to penalty fare payment, but fail to settle fee arrears within the specified payment deadline.

Purpose of processing:	Processing of data of the Company's contracted partners and partners with arrears for arrears management purposes.
Scope of data processed:	<ul style="list-style-type: none"> • identification number of the ticket inspector; • number of bus service; • passenger's name; • place and date of birth; • mother's name; • ID card number; • residence card number; • number(s) of other certificate(s); • permanent address; • residence; • for a minor or incapacitated person: name, address and place of work of the guardian; • bus line number; • direction of travel; • place of inspection. • data relating to billing and fare payment.
Legal grounds for processing:	Consent of the data subject as per Section 5 (1) b) of Information Act.
Data storage period:	Settlement of arrears, but not more than the limitation period for civil claims in respect of arrears (5 years).
Method of data storage:	Paper-based and electronic.
Source of personal data:	The data subject.
Scope of data subjects:	Customers/passengers with arrears.
Name of data processor:	Paksi Közlekedési Kft. Administrator: Teréz Mariann Bencze
Address of data processor:	H-7030, Dózsa György út 55-61., Paks, Hungary
Activities related to processing:	Legal representation.
Actual place of data management and processing:	H-7030, Dózsa György út 55-61., Paks, Hungary

Data transfer:	No data transfer takes place in connection with the processing.
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6. Customer Service Processing

Any passenger or other person making use of the Company's passenger transport-related services has the right to notify any suggestions, remarks, grievances, complaints made or any damage incurred in relation to the services used (hereinafter referred to as "complaints") to the Company, and may request that the incident or behaviour complained of be investigated or that his/her suggestions duly considered.

Complaints can be reported either orally (in person or by phone) or in writing (by letter, email, or via the relevant form on the website). The complainant is advised to provide his/her name and contact details, otherwise the Company will not be able to send him/her its response.

The Company is required to put on record all oral complaints in accordance with the relevant provisions of its Business Policy, and have the record signed by all interested parties, recording their names and addresses.

The Company provides the complainant with a copy of the record.

In the complaint management procedure, the Company may record the following data:

- customer's name;
- customer's address, registered office and postal address;
- customer's telephone number;
- customer's signature;
- method of notification;
- the service complained of;
- description and reasons of the complaint;
- claim raised by the complainant;
- a copy of the documents in the customer's possession that are necessary to support the complaint and are not available to the service provider;
- valid power of attorney for customers acting by proxy;
- any other pieces of information that may be required for investigating, and responding to, the complaint.

The Company displays a "Customer Complaint Log" at each site available for the submission of a complaint.

Purpose of processing:	Recording, investigating and processing complaints.
Scope of data processed:	<ul style="list-style-type: none"> • data provided by the data subject (name, address, telephone number and any other voluntary information provided by the complainant), • other personal data related to the complaint, which can be linked to a person employed by the Company, • audio recording of the conversation with data subject's voice, • audio recording of the conversation with the administrator's voice.

Legal grounds for processing:	Consent of the data subject as per Section 5 (1) a) of Information Act.
Data storage period:	The Company is obliged to keep the record of the complaint and a copy of its response for five years and present them at the request of the inspection authorities [Section 17/A (7) of Consumer Protection Act].
Method of data storage:	Paper-based and electronic.
Source of personal data:	The data subject.
Scope of data subjects:	Complaining customers.
Name of data processor:	Paksi Közlekedési Kft.
Address of data processor:	H-7030, Dózsa György út 55-61., Paks, Hungary
Activities related to processing:	Complaint processing
Actual place of data management and processing:	H-7030, Dózsa György út 55-61., Paks, Hungary
Data transfer:	No data transfer takes place in connection with the processing.

7. Claims-related Processing

In case of an incident giving rise to a claim, the root causes behind the incident and personal data of those sustaining the damage are recorded in an electronic registration system and stored, as provided for in the legislation on the limitation period applicable to civil claims, for 5 years.

When a claim for damages is filed, we ask the data subject to sign a statement of consent regarding the processing of the data (including special personal data) that the Company takes possession of and the transfer of such data to a competent third party (e.g. an insurance company).

Purpose of processing:	Investigation of damage incidents, assessment of claims for damages and claim statements submitted to the Company and transfer of claims, if prove to be legitimate, to the party responsible for the incident (with the Company not being the obligor/the party obliged to make good the damage caused) and the insurance company.
Scope of data processed:	<ul style="list-style-type: none"> • name of the data subject; • mother's name; • address; • tax ID no.; • date of birth; • place of birth; • social security number; • telephone number; • description of the incident/accident; • health data; • incident/accident-related medical certificates; • method of notification; • any other data in the Company's legitimate possession that may be necessary for the assessment of the claim.
Legal grounds for processing:	Consent of the data subject as per Section 5 (1) a) of Information Act.
Data storage period:	5 years.
Method of data storage:	Paper-based and electronic.
Source of personal data:	The data subject.
Scope of data subjects:	Customers with claims for damages.
Name of data processor:	Paksi Közlekedési Kft.
Address of data processor:	H-7030, Dózsa György út 55-61., Paks, Hungary
Activities related to processing:	Claims settlement.

Actual place of data management and processing:	H-7030, Dózsa György út 55-61., Paks, Hungary
Data transfer:	Due to the nature of the damage incidents, transfer may take place towards Paksi Közlekedési Kft's insurance company.

8. Data Processing Arising from the Operation of the Website

The Company operates a website, which can be found at www.paksbusz.hu. This website is hosted by an external service provider.

Anyone may access the Company's website without disclosing their true identity or providing personal information, and may obtain information freely and without restriction on the website and related sites. The website collects, without restriction and automatically, non-personally identifiable information about visitors. However, no personal data can be extracted from these data, so our Company does not perform any processing of personal data in this respect.

The website of Paksi Közlekedési Kft. uses cookies that can be used, managed and deleted as described below.

What is a cookie?

HTTP cookies are small blocks of data created by a web server while a user is browsing a website and placed on the user's computer or other device by the user's web browser. They are not computer programs, just small information files which allow websites to store and access information about a user's browsing patterns. Most websites use cookies because they help enhance the user experience on the Internet.

There are various types of cookies, e.g. temporary cookies (or session cookies) that expire once a user logs off or closes his/her browser and permanent (or persistent) cookies that are not deleted by the browser but remain active until they are deleted or expire (depending on what is the lifetime of a cookie specified by the website).

What is the purpose of a cookie?

Cookies can carry any information content specified by the server, in most cases status and auxiliary information.

The purpose of cookies is to improve the quality of browser services in the following ways:

- Enabling some special features. For example, when filling out forms, cookies note the information entered so that the user does not have to type in the right information again.
- Enabling services that recognize the device used for browsing, so the visitor does not have to enter the same information more than once during a task.
- For statistical purposes, making a record of how many people view the website, in what time range, and from what geographical location. This will help determine the computing and storage capacity needed to ensure optimal website performance.
- Analysing data to improve the user experience to help understand how people use the website.

How to delete a cookie?

Most browsers automatically accept cookies.

Cookies can be turned off by the users in their browser, but if they do so, they may lose many of the features needed to use the website properly.

For more information about cookies, visit www.aboutcookies.org, which provides comprehensive and independent information on how to disable cookies in your browser settings and how to delete cookies on your computer.

For instructions on how to delete cookies on your mobile phone, see the user guide of your device.

By accepting this Privacy Notice and by visiting and using the website, the user accepts the use of cookies. The user can also accept the use of cookies with the settings specified in the web browser.

Cookies on the website of Paksi Közlekedési Kft.

We use HTTP cookies on our pages for more efficient and high-quality operation. You can delete cookies at any time in your browser settings or even disable them. By disabling cookies, you acknowledge that the operation of the site will not be complete.

Cookie name	Validity	Possible values	Function
PHPSESSID	Till the end of the browsing session	A unique ID	For session identification
wp-wpml_current_language	1 day	"hu" or "en" or "ru"	Auxiliary information used for language settings on the website

Purpose of processing:	Identifying visitors to the website and making electronic services available to them.
Scope of data processed:	The start and end dates of the user's visit and, in some cases (depending on the settings of the user's computer), the type of browser and operating system, other recorded data (cookies).
Legal grounds for processing:	Consent of the data subject as per Section 5 (1) a) of Information Act.
Data storage period:	Until the purpose of processing is achieved, but not more than 2 years.
Method of data storage:	Electronic.

Source of personal data:	The data subject.
Scope of data subjects:	Visitors of the website.
Name of data processor:	Arteries Studio Kft.
Address of data processor:	H-1138, Váci út 175., Budapest, Hungary
Activities related to processing:	Web hosting.
Actual place of data management and processing:	H-1138, Váci út 175., Budapest, Hungary
Data transfer:	No data transfer takes place in connection with the processing.

Communication with, and the Rights of, Data Subjects:

The Company's customers may request information on the processing of their personal data at the contact details specified in this Privacy Notice, as well as may request the rectification, deletion or blocking of their personal data.

At the request of data subjects, the Company is obliged to provide information on the data processed by it or by the data processor entrusted by the Company and their source, as well as on the purpose, legal grounds and duration of the processing, the name and address of the data processor and its activities related to data processing, circumstances of a potential data protection incident, its effects and the measures taken to remedy it, and, if personal data of the data subject are to be transferred, the legal grounds and the recipient of the transfer. The Company is obliged to provide the relevant information in a comprehensible form as soon as possible after the submission of the application, but within 25 days at the latest, in writing if so requested by the data subject.

The information should be made available free of charge if the person requesting the information has not yet submitted a request to the data controller for the same data set in the current year. In other cases, the Company will charge a fee.

When a personal data is incorrect, the Company will rectify it if in possession of the correct data.

Personal data must be deleted if the processing proves to be unlawful and the erasure is requested by the data subject, or if it is incomplete or incorrect, and this state cannot be legally remedied, provided that deletion is not precluded by law, the purpose of data processing has ceased to exist or the term for the storage of data specified by law has expired, or if ordered by a competent court or authority.

Instead of erasure, the controller should block the personal data if the data subject so requests or if, on the basis of the available information, it can be presumed that the erasure would harm the data subject's legitimate interests. Personal data blocked in this way may only be processed for as long as the purpose of the data processing, which precluded the deletion of personal data, exists.

If the request of the data subject is found by the Company to be legitimate, it will take immediate action to rectify or delete the personal information at issue.

If the Company does not comply with a request for rectification, blocking or erasure, it is obliged, within 25 days of receipt of the request, to communicate in writing or, with the consent of the data subject, electronically the reasons in fact and in law for rejecting the request for rectification, blocking or erasure. When the Company decides to reject a request for rectification, blocking or erasure, it is obliged to inform the data subject of the available means of legal redress and the opportunities available for having recourse to the competent authority.

The Company will hold harmless and indemnify others from any damage caused by unlawful processing of the data subject's data or by violating data security requirements. The Company is exempt from liability if the damage or violation of the data subject's personal rights was caused by an unavoidable cause outside the scope of data processing. The Company will not refund the

cost of any damage if it is incurred through the intentional or grossly negligent conduct of the injured party.

Means of Redress

Data subjects whose rights are infringed in connection with the processing of their personal data can assert their rightful claims before a civil court or have recourse to the National Authority for Data Protection and Freedom of Information.

1. Judicial Enforcement

When the rights of a data subject are violated, and in the cases specified in Section 21 of Information Act, the recipient may bring an action before the competent court. The court will promptly consider such cases. The assessment of trials falls within the jurisdiction of the competent tribunal. The action may be brought before the tribunal of the data subject's permanent or habitual residence at his/her option.

2. National Authority for Data Protection and Freedom of Information

Location: H-1125, Szilágyi Erzsébet fasor 22/C., Budapest, Hungary

Postal address: H-1530 Budapest, Pf.: 5.

Telephone: +36 1 391 1400

E-mail: ugyfelszolgalat@naih.hu