

Privacy Notice

on the Processing of Personal Data of Event Participants

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In accordance with Articles 13 and 14 of 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 (hereinafter referred to as "GDPR"), the Data Controller provides the following information to data subjects regarding the processing of their personal data.

	Data Controller
Name	Alpiq Szolgáltató Kft.
Registered office:	1211 Budapest, Hőerőmű utca 3.
Postal address:	1085 Budapest, Kálvin tér 12.
Email	privacy.hu@alpiq.com
Telephone, fax:	+36-1-278-38-00
Website	https://www.alpiq.com/hu/about-us/our-activities/alpiq-magyarorszag

Legal basis for data processing

- **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 (**General Data Protection Regulation**) (hereinafter: **GDPR**)
- **Act CXII of 2011** on the right to self-determination in relation to information and freedom of information (hereinafter: **Infotv**)

Definitions - Within the meaning of the GDPR

'**Personal data**' means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

'**Recipient**' means a natural or legal person, public authority, agency, or any other body to which the personal data are disclosed, whether a third party or not. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by such public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Personal Data

Purpose of processing	Categories of data processed	Duration of data processing	Legal basis	Source of data	Recipient (if any)	Purpose of communication

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						(if there is a recipient)
Photographs will be taken during the event and may be used in subsequent communications on various internal and/or external communication platforms.	Image	The day of recording + 20 years	Consent	Directly from the data subject	Companies of the Alpiq Csepel Group	Due to communication related to events involving several companies within the Alpiq Csepel Group
At events organized by the Company, personal data are processed for the purposes of ensuring personal and property security, identifying individuals entering the premises, and maintaining contact with the data subject.	Full name, telephone number	The day of the event + 1 day	Legitimate interest	Directly from the data subject	Companies of the Alpiq Csepel Group	Within the Alpiq Group, for reasons of life and property safety, in order to maintain contact with the data subject

You (or, in the case of individuals under the age of 16, the parent or legal guardian exercising parental authority) acknowledge and accept this Notice, which has been provided to you on-site or by e-mail and remains available to you. For the purposes specified above, data processing means any operation performed on your personal data, including recording, organizing, storing, using, transferring, blocking, erasing, destroying, or preventing further use of the data.

The provision of personal data is at your discretion. You may voluntarily withdraw your consent at any time, but the withdrawal of consent does not affect the lawfulness of data processing prior to the withdrawal. Incomplete, contradictory or incomprehensible markings shall be interpreted by the Data Controller as a refusal of consent. In the case of children under the age of 16, the processing of the child's personal data is only lawful if and to the extent that consent has been given or authorised by the person exercising parental authority over the child.

Who can access your personal data?

As a general rule, the personal data of the data subject may be accessed by the Data Controller and the Data Processor's employees designated by the Recipients in order to perform their tasks, for example, to provide security services. The Data Controller shall only transfer the personal data of the data subject to other state authorities in exceptional cases. For example, if legal proceedings are initiated in a dispute between the data subject and the Data Controller and the court hearing the case requires the transfer of documents containing the personal data of the data subject, the police will contact the Data Controller and request the transfer of documents containing the personal data of the data subject for the purposes of the investigation. In addition, for example, the lawyer representing the Data Controller will also have access to personal data if a legal dispute arises between the data subject and the Data Controller.

Data security measures

The Data Controller stores the personal data provided by the data subject at the Data Controller's registered office. The Data Controller shall take appropriate information security measures to protect the personal data of the data subject against, inter alia, unauthorized access or unauthorized

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alteration. The Data Controller shall take appropriate organizational measures to ensure that personal data are not made accessible to an indefinite number of persons.

Neither the Data Controller nor the Data Processor shall TRANSFER personal data under this Notice to a third country or international organization.

Neither the Data Controller nor the Data Processor **shall use automated decision-making or profiling with regard to personal data under this Notice.**

Your Rights

Pursuant to Article 15 of the GDPR, the data subject may request access to personal data concerning him or her as follows:

(1) The data subject shall have the right to obtain from the Data 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:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the categories of recipients to whom the personal data have been or will be disclosed, including recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored shall be indicated; if this is not possible, the criteria used to determine that period shall be provided;
- e) the data subject has the right to request from the Data Controller the rectification, erasure, or restriction of processing of personal data concerning him or her, as well as to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved and the significance and the envisaged consequences of such processing for the data subject.

(2) The Data Controller shall provide the data subject with a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Data Controller may charge a reasonable fee based on administrative costs. If the data subject has submitted the request electronically, the information shall be provided in a widely used electronic format, unless the data subject requests otherwise. The right to request a copy shall not adversely affect the rights and freedoms of others.

Under Article 16 of the GDPR, the data subject shall have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning him or her. Upon request by the data subject, the Data Controller shall rectify inaccurate personal data concerning him or her without undue delay. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Pursuant to Article 17 of the GDPR, the data subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her in accordance with the following:

(1) The data subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her, and the Data Controller shall have the obligation to erase personal data concerning the data subject without undue delay where one of the following grounds applies:

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- 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 the processing is based and there is no other legal ground for the processing;
- c) the data subject objects to the processing of personal data for reasons of public interest, for the exercise of official authority or for the legitimate interests of the data controller (third party), and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing of personal data for direct marketing purposes;
- d) the personal data has been unlawfully processed;
- e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law (Hungarian law) to which the controller is subject;
- f) the personal data has been collected in relation to the offer of information society services.

(2) Where the Data Controller has made the personal data public and is obliged to erase it pursuant to paragraph (1), it shall take reasonable steps, taking into account available technology and the cost of implementation, , including technical measures, to inform data controllers who process the data that the data subject has requested the deletion of links to, or copies or replications of, the personal data in question.

(3) The data subject's right to erasure may only be restricted in the following cases specified in the GDPR, i.e. the further storage of personal data may be considered lawful if the above reasons apply: a) for exercising the right of freedom of expression and information, or b) for compliance with a legal obligation, or c) for performing a task carried out in the public interest, or d) for exercising official authority vested in the controller, or e) for reasons of public interest in the area of public health, f) for archiving purposes in the public interest, or g) for scientific or historical research purposes or statistical purposes, or h) for the establishment, exercise or defence of legal claims.

Pursuant to Article 18 of the GDPR, the data subject shall have the right to request from the Data Controller the restriction of processing of his or her personal data in the following cases:

(1) The data subject shall have the right to request from the Data Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, in which case the restriction shall apply for a period enabling the Data 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 Data 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 defence of legal claims; or
- d) the data subject has objected to processing in the public interest, in the exercise of official authority or for the purposes of the legitimate interests pursued by the controller (third party); in this case, the restriction shall apply for a period enabling the controller to verify whether the legitimate grounds of the controller override those of the data subject.

(2) Where processing is restricted pursuant to the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence 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.

(3) The Data Controller shall inform the data subject whose data processing has been restricted pursuant to paragraph (1) at his or her request in advance of the lifting of the restriction of data processing.

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Pursuant to Article 21, the data subject shall have the right to object to the Data Controller regarding the processing of personal data concerning him or her as follows:

(1) 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 based on public interest, the exercise of official authority or the legitimate interests pursued by the controller (third party), including profiling based on such processing. In this case, the Data Controller may no longer process the personal data unless the Data 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 defence of legal claims.

(2) 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. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data shall no longer be processed for that purpose.

(3) The right to object must be explicitly brought to the attention of the data subject at the latest at the time of the first contact with the data subject, and the information relating to this right must be presented clearly and separately from any other information.

(4) In relation to the use of information society services, and by way of derogation from Directive 2002/58/EC, the data subject may also exercise the right to object by means of automated devices based on technical specifications.

(5) Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject shall have the right to object to the processing of personal data concerning him or her on grounds relating to his or her particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Under Article 20 of the GDPR, the data subject shall have the right to data portability in relation to personal data concerning him or her, as follows:

(1) 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 without hindrance from the controller to which the personal data have been provided, where:

a) the legal basis for the processing is the consent of the data subject or the performance of a contract with the data subject b) and the processing is carried out by automated means.

(2) When exercising the right to data portability, the data subject shall have the right to request the direct transfer of personal data between data controllers, if this is technically feasible.

(3) The exercise of the right to data portability shall not affect the right to erasure. The right to data portability shall not apply if the data processing 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.

(4) The right to data portability shall not adversely affect the rights and freedoms of others.

Pursuant to Article 7(3) of the GDPR, the data subject shall have the right to withdraw consent to the processing of his or her personal data at any time as follows:

The data subject shall have the right to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. The withdrawal of consent shall be as easy as giving it.

Legal remedy

The data subject has the right to seek legal remedy before a court of law or to lodge a complaint with a supervisory authority.

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In the event of unlawful data processing experienced by the data subject, civil proceedings may be brought against the Data Controller. The court has jurisdiction to hear the case. At the data subject's discretion, the lawsuit may also be brought before the court of the place of residence of (a list of courts and their contact details can be found at the following link: <http://birosag.hu/torvenyszekek>

Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement – if they consider that the processing of personal data relating to them infringes the GDPR.

National Authority for Data Protection and Freedom of Information (NAIH)

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