

PRIVACY POLICY**on data processing by MÁV Passenger Transport Co. in connection with information on the use of "cookies"***(Valid from 28th of March, 2025)***1. The identity and contact details of the data controller****MÁV Passenger Transport Private Company Limited by Shares**

Headquarters: 1091 Budapest, Üllői út 131.

Company reg. no.: 01-10-045551

E-mail: eszrevetel@mavcsoport.hu

hereinafter: Data Controller.

*Contact details of the Data Protection Officer:*E-mail: adatvedelem.szemely@mavcsoport.hu

Postal address: 1384 Budapest, P.O.B. 780. – please mark the following on the envelope: "To the Data Protection Officer".

2. The Data processor's name and contact informations**MÁV Service Center Private Limited Company**

Headquarters: 1134 Budapest, Dévai u. 23.

Company reg. no.: 01-10-045838

hereinafter: Data Processor

Based on the service contract concluded between the Data Controller and the Data Processor, the Data Processor provides IT service to the Data Controller, which includes the operation of communication applications (e.g. mail system and other registration systems) as well as the server service of computing devices, for which the personal data specified in this privacy policy is stored for the Data Controller.

3. Information on individual data processing (short description of the data processing performed in connection with „Cookies” involved in the MÁV+ application)

3.1. The data subject related to use of „Cookies”: the identified natural person (hereinafter: user), who registers and creates user profile / account in the MÁV+ application (hereinafter: application) by directly providing their personal data, and therefore the application places cookies on the devices used by the data subject (e.g. mobile phone) (hereinafter: data subject).

3.2. What are those „Cookies”?: When a user installs the MÁV+ application on his/her devices, and opens and starts the use of the application, the Data Controller installs a small datafile, so-called cookies (hereinafter: cookies) on his/her devices. The cookies available in the application could be listed in two categories. One group includes cookies that are essential for the operation of the application, while the other includes all other cookies whose purpose or function goes beyond the operation of the application and serves other data processing purposes. We use functional cookies in the application to ensure that all functions of the application operate properly and securely. They cannot be switched off by the user, because without them the application would not operate properly. In the case of the consent of the data subject, we also use performance cookies, which help us improve the performance of the application and provide information about any malfunctions. It is possible to switch off the performance cookies in the appropriate menu item of the application.

4. Information on data processing

4.1. Scope of processed data, purpose, legal basis and duration of their processing:

Type and name of the „Cookie”	Purpose of the data processing	The legal basis of the data processing	The duration of the data processing
<p><u>Strictly Necessary Data</u> (Functional-mandatory)</p> <ul style="list-style-type: none"> • basic application settings • data created by users while using the application • storage of login tokens (Authentication and security) • connection management with server (quality assurance of server communication, via StoreLogs service) • error monitoring (with Firebase Crashlytics and Dynatrace services). 	<p>Collecting data and events essential for the basic operation of the application.</p>	<p>The point e) of the paragraph (1) of the Article 6 of the GDPR, with regard to paragraph (1)-(2) of the Article 5 of the Act LXIX of 2024 on Cybersecurity in Hungary.</p> <p>These cannot be switched off by the user, because without them the application would not operate properly.</p>	<p>Related to local data during the application lifecycle (until the application is uninstalled or the application data is deleted by the user).</p> <p>For error monitoring data until the error is corrected.</p>
<p><u>Performance</u> (Statistical-optional)</p> <ul style="list-style-type: none"> • analytics data (Firebase / Google Analytics). • collecting application usage statistics 	<p>Monitoring system cookie used to improve the application</p>	<p>According to the point a) of the paragraph (1) of the Article 6 of the GDPR the data subject's consent, which the data subject can give by switching on when the application starts.</p>	<p>Up to 2 years (Google Analytics_ga)</p>

4.2. **Source of the personal data:** data subject.

4.3. **Means for processing:** electronic.

4.4. **The eligible persons authorized to disclose the data:** the data could be accessed and viewed by those employees who performing tasks related to the development and operation of the application.

4.5. **The recipient of personal data: through provisions in contracts with service providers,** we secure that the service providers we use process personal data in accordance with European data protection law to ensure a high level of data protection, even in cases where personal data is transferred to a country with a different level of data protection and for which the EU Commission has not adopted an adequacy decision. Google Inc. (seat: 1600 Amphitheatre Parkway, Mountain View, California 94043, USA) is included on the list of „EU-U.S. Data Privacy Framework”, therefore data transmission to it could be considered secure. We do not transfer personal data to other recipients, except in cases where the law prescribes it.

5. The rights of the data subject and the manner of their exercise

5.1. Right to request information

The data subject can primarily exercise his/her rights in the application submitted through the contact details indicated in point 1 of the Data Controller. We inform the data subject that he/she can submit his/her request for the exercise of the data subject's right to any of the Data Controller's contact details, but we recommend that he/she do so through one of the contact details indicated in point 1.

The Data Controller shall provide the information in writing, in an understandable form, as soon as possible after the submission of the request, but no later than one month. If necessary, taking into account the complexity of the application and the number of applications, this deadline can be extended by another two months. The data controller shall inform the data subject of the extension of the deadline,

indicating the reasons for the delay, within one month of receiving the request. The Data Controller primarily fulfills the data subject's request in the form requested by the data subject. If the data subject submitted the request electronically, the Data Controller will provide the answer electronically, unless otherwise requested by the data subject.

The Data Controller ensures the exercise of data subject rights free of charge for the data subject. If the data subject's request is clearly unfounded or – especially due to its repetitive nature – excessive, the Data Controller may, taking into account the administrative costs associated with providing the requested information or information or taking the requested measure, charge a reasonable fee or refuse to take action based on the request. The Data Controller may refuse to fulfill a request to exercise its data subject rights until it cannot identify the data subject beyond any doubt.

5.2. *The right of access and the right to request a copy*

The data subject is entitled to receive feedback from the Data Controller as to whether their personal data is being processed. Based on the right of access, the data subject is entitled to receive access to the personal data related to the ongoing data processing about the following information: the purpose of the data processing, the categories of personal data, the duration of the data processing, who and for what purpose receive or have received the personal data of the data subject, his or her rights related to data processing, and the right to submit a complaint to the supervisory authority.

Based on the request of the data subject, the Data Controller provides a copy of the processed personal data if it does not adversely affect the rights and freedoms of others. The Data Controller provides a copy of the personal data to the data subject free of charge for the first time, and may charge a fee for each additional copy.

5.3. *Right to withdraw consent*

The data subject may withdraw their consent to the use of performance cookies at any time without restriction, which they can do in the application under the Help menu item in the Data Processing Settings by switching off the performance cookie.

The data subject may withdraw his/her consent in accordance with point a) of the paragraph (1) of the Article 6 of the GDPR at any contact point of the Data Controller without any time limit, which does not affect the legality of the data processing carried out on the basis of the consent prior to the withdrawal. If the data subject withdraws his/her consent, the Data Controller will delete the data subject's data without delay and inform the data subject of the measures taken.

5.4. *The right to modify, correct and supplement data*

The right to modify, correct and supplement data cannot be interpreted in the context of cookie processing in the application, so the Data Controller cannot fulfill the data subject's request in this regard.

5.5. *The right to erasure ('right to be forgotten')*

The data subject may request the deletion of his/her personal data if the purpose of the data processing has ceased, if the data subject withdraws his/her consent, if the data processing is unlawful, if the specified time limit for data storage has expired, and if it has been ordered by a court or authority.

You have opportunity to delete cookies (so switching off) in the appropriate menu item of the application.

5.6. *Limitation of data processing*

The data subject may request that the processing of his/her personal data be restricted by the Data Controller at any contact point of the Data Controller if:

- disputes the accuracy of the personal data (in this case, the limitation applies to the period until the Data Controller checks the correctness of the data);

- the data processing is illegal, but the data subject opposes the deletion of the data and requests the restriction of their use;
the purpose of the data processing has ceased, but the data subject needs them to present, enforce and defend legal claims.

The limitation of data processing lasts as long as the reason specified by the data subject makes it necessary. Where processing has been restricted, 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. The Data Controller informs the data subject in advance of the lifting of the restriction at the request of the data subject.

5.7. Right to data portability

In case of data processing the consent based on the point a) of the paragraph (1) of the Article of the GDPR, and if the data processing is carried out by automated means, the data subject may request, via the contact details provided in point 1, to receive their personal data in a structured, commonly used and machine-readable format and has the right to transmit them to another data controller. The data subject also has the right to request the direct transmission of their data between data controllers, where it's technically feasible.

5.8. Right to object

The data subject has the right to object at any time to the processing of his personal data based on point e) of paragraph (1) of the Article 6 of the GDPR for reasons related to his own situation. This right can be exercised in the case of data processing indicated in this Privacy Policy. In this case, the Data Controller will not process the personal data unless the 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. If the data subject objects to the data processing contained in this Privacy Policy, the Data Controller will individually examine the feasibility of the request.

5.9. Remedies (Right to appeal)

If the data subject has comments or objections regarding the processing of his personal data, or would like to request information about the processing of his/her data, he/she can do so in an e-mail written to adatvedelem.szemely@mavcsoport.hu. If the data subject would like to find out more about the rights, please visit the website <https://www.mavcsoport.hu/mav-szemelyszallitas/bemutakozas/adatkezelesi-tajekoztatok>. If the data subject does not agree with the data processing carried out by the Data Controller or believes that the data controller has violated one of his rights, he can lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information at any of the following contact details:

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

Postal address: 1363 Budapest, Pf. 9.

Phone no.: +36 (1) 391-1400 / +36 (30) 683-5969 / +36 (30) 549-6838

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

If the data subject does not agree with the data processing carried out by the Data Controller or believes that the data controller has violated one of his rights, the data subject may apply directly to the Data Controller for legal redress, which request must be submitted to the court at the Data Controller's registered office or the data subject's place of residence. submit. The court acts out of sequence in the case.

5. Legislation applied and referred to during above-mentioned data processings

- 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 / GDPR);
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information;
- Act C of 2003 on Electronic Communications,
- Act LXIX of 2024 on Cybersecurity in Hungary.

Data Controller