



**MÁV-START RAILWAY PASSENGER TRANSPORT CO.**

1091 Budapest, Üllői út 131.  
Website: [www.mavcsport.hu](http://www.mavcsport.hu)

**Privacy Policy about data processing on the [www.emma.mav.hu](http://www.emma.mav.hu) website operated by MÁV-START Co.**

**1. The Data controller's name and contact informations**

Name: MÁV-START Railway Passenger Transport Co.  
Headquarters: 1091 Budapest, Üllői út 131.  
Co.reg.no.: 01-10-045551  
E-mail: [eszrevetel@mav-start.hu](mailto:eszrevetel@mav-start.hu)  
(hereinafter: "MÁV-START Co." or "Data Controller")

**Contact details of the Data Protection Officer:**

E-mail: [adatvedelem@mav-start.hu](mailto:adatvedelem@mav-start.hu)  
Postal address: 1091 Budapest, Üllői út 131. – Please indicate on the envelope the following: „for the Data Protection Officer”.

**2. Data Processors name and contact information**

Name: MÁV Service Center Co.  
Headquarters: 1134 Budapest, Dévai u. 23.  
Co.reg.no.: 01-10-045838  
E-mail: [helpdesk@mav-szk.hu](mailto:helpdesk@mav-szk.hu)  
(hereinafter: "Data Processor")

Based on the service contract between the Data Processor and the Data Controller, it provides IT services, which include the operation and development of the website, as well as the related data processing.

**3. The data subject:** The person who visits the <https://emma.mav.hu/#/> website (hereinafter: website) operated by the Data Controller with using any IT device (hereinafter: device).

**4. Information on data processing's**

*4.1 Data processing in connection with route planning*

<i>The purpose of data processing</i>	Ensuring that the data subject can plan the route from their "current position" or from any other point using the route planning function of the website.
<i>Scope of processed data</i>	IP address and the type of browser from which the website was accessed, and all the parameters of the route search (e.g. from where, to where, modes of transport, waiting time, etc.).
<i>The legal basis of data processing</i>	According to Article 6 (1) point a) of the GDPR, the consent of the data subject, which can be given in a pop-up window in the browser when visiting the website. Without consent, "the current position" route planning function cannot be used, in which case the departure and destination stations must be entered separately for route planning.
<i>Duration of the data processing</i>	During route planning.

*4.2. Data processing related to the provision of certain functions of the website ("local data")*

<i>The purpose of data processing</i>	Provision of settings and functions affecting the operation of the website (e.g. language, dark mode).
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<i>Scope of processed data</i>	Settings stored as local data in the user's browser: <ul style="list-style-type: none"> <li>• Website language;</li> <li>• Whether the data processing information has been accepted (the consent was given);</li> <li>• Whether high contrast mode has been activated;</li> <li>• What platform does the page run on (in case of Webview loading);</li> <li>• Dimensions and resolution of the page (when loading Webview);</li> <li>• Has dark mode been activated (when loading Webview).</li> </ul>
<i>The legal basis of data processing</i>	According to Article 6 (1) (f) of the GDPR, data processing is necessary to enforce the Data Controller's legitimate interests. The Data Controller has a legitimate interest in enabling the functionality and application of the settings and functions available on the website it operates by ensuring the convenience of website users, easier access to the service (e.g. through the language setting), and the appropriate use of the online platform available to them.
<i>Duration of the data processing</i>	While the website is running in the browser.

**4.3. Data processing for the proper and secure operation of the site**

<i>The purpose of data processing</i>	Screen and prevent of malicious use of the website, filtering and remedying errors.
<i>Scope of processed data</i>	IP address; the type of browser from which the website was accessed, as well as the visited URL address and URL parameters.
<i>The legal basis of data processing</i>	According to Article 6 (1) (f) of the GDPR, data processing is necessary to enforce the Data Controller's legitimate interests. The Data Controller has a legitimate interest in filter malicious use of the website it operates, if it is detected, take action against it by blocking the IP address, as well as continuously monitor errors that occur when visiting the website and eliminate them.
<i>Duration of the data processing</i>	7 days after visiting the website.

**4.4. Data processing for statistical purposes**

<i>The purpose of data processing</i>	Measuring the frequency of route searches and the number and quantity of destinations and routes when using the website.
<i>Scope of processed data</i>	The time of the search, as well as all parameters of the route search (e.g. from where, to where, modes of transport, waiting time, etc.).
<i>The legal basis of data processing</i>	According to Article 6 (1) (f) of the GDPR, data processing is necessary to enforce the Data Controller's legitimate interests. The Data Controller has a legitimate interest in get an idea of how often website users use the service and for which destinations.
<i>Duration of the data processing</i>	30 days after visiting the website.

**5. Rights and enforcement options for data subjects**
**5.1 Right to request information**

The data subject may request information from the data controller at any contact details of the Data Controller, request the rectification of his or her personal data and request the restriction of data processing. At the request of the data subject, the Data Controller shall provide information on the data processed by him, the purpose, legal basis, duration of data processing, the name, address (registered office) of the data controller, the name, address (registered office) and activities related to data processing of the data processor, the contact details of the data protection officer, as well as who receives or received the personal data of the data subject and for what purpose, as well as the rights of the data subject in connection with data processing. The Data Controller shall provide the information in writing,

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in an easily understandable form, within the shortest possible time from the submission of the request, but not later than within one month. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. If the request for information is unfounded or excessive, in particular due to its repetitive character, the Data Controller may determine a reimbursement of costs or refuse to act on the request. The Data Controller may refuse to comply with the request to exercise the rights of the data subject until it can be identified beyond doubt.

#### **5.2. Right to access**

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. Based on the right of access, the data subject has the right to access personal data related to ongoing data processing and the following information: purpose of data management, categories of personal data managed, duration of data management, recipients of data transfer (who and for what purpose receives or received the data subject's personal data), the data subject's rights related to data management and the right to submit a complaint to the supervisory authority.

At the request of the data subject, the data controller will provide a copy of the personal data that is the subject of data management - if it does not adversely affect the rights and freedoms of others. The data controller may charge a fee for additional copies requested by the data subject.

#### **5.3. Right to withdraw consent**

The data subject may withdraw his or her consent given in point 4.1., which does not affect the legality of the data processing concerned prior to the withdrawal. If the data subject withdraws his consent, the data subject will not be able to plan a route from his "current position", but must also specify the starting point during route planning.

#### **5.4. Right to amend, rectify and complete data**

The right to amend, rectify and complete data cannot be interpreted in connection with cookie management on the website, so the Data Controller cannot fulfill the data subject's request in this regard.

#### **5.5. Right to erasure of data ('right to be forgotten')**

The data subject may request the erasure of his or her personal data if the purpose of data processing ceases to exist, if the data subject withdraws his or her consent, if the processing of the data is unlawful, if the data subject has objected to the processing of the personal data and there is no overriding legitimate reason that can justify the data processing, if the specified period for storing personal data has expired, and if it has been ordered by a court or authority. The Data Controller will notify the data subject of the deletion of personal data. The Data Controller shall not delete personal data if they are necessary for compliance with a legal obligation to which the Data Controller is subject, as well as for the establishment, exercise or defence of legal claims.

During the use of the website, several small data (hereinafter: "local data") are placed on the device - see 4.2. during data management indicated in point -, to the browser's local storage assigned to the website. These data are local data essential for the operation of the website, which store the website settings. Deleting the local data is possible in the corresponding menu item of the browser, further there is help for this in the browser's help. If required, local data must be deleted on all browsers used by the data subject. After deletion, when visiting our website, the browser will give information again about



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the storage of local data. We would like to draw your attention to the fact that after deleting the local data, certain functions of the website will not work or will only work to a limited extent. We would like to draw the attention to the fact that after deleting the local data, certain functions of the website will not work or will only work to a limited extent.

#### ***5.6. Restriction of processing***

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

- contests the accuracy of the personal data (in this case, the restriction applies for the period during which the Data Controller verifies the correctness of the data);
- the processing is unlawful, but the data subject opposes the erasure of the data and requests the restriction of their use;
- the purpose of data processing has ceased to exist, but the data subject needs them for the establishment, exercise and defence of legal claims.

The restriction shall last as long as the reason indicated by the data subject so requires. In this case, personal data – with the exception of storage – shall only be processed with the consent of the data subject; or for the establishment, exercise or defence of legal claims; or to protect the rights of another natural or legal person; or for important reasons of public interest. The Data Controller shall inform 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 the case of data processing in accordance with point a) of Article 6 (1) of the GDPR (consent) and if the data processing is automated, the data subject can request to receive his personal data in a segmented, widely used, machine-readable format via the contact information provided in point 1., and is entitled to forward them to another data controller. The data subject is also entitled to - if this is technically feasible - request the direct transmission of his or her datas between data controllers.

#### ***5.8. Right to object***

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 based on Article 6 (1) (e) and (f) GDPR. In that case, the controller shall no longer process the personal data unless there are 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 shall examine the fulfillment of the request individually.

#### ***5.9. Right to complaint***

In the event of a violation of the data subject's rights, or if you object to the processing of data by the Data Controller, you may file a complaint with the National Data Protection and Freedom of Information Authority at any of the following contact details:

Name: National Authority for Data Protection and Freedom of Information  
Headquarters: 1055 Budapest, Falk Miksa utca 9-11.  
Postal address: 1363 Budapest, Pf. 9.  
Telephone: +36 (1) 391-1400 / +36 (30) 683-5969 / +36 (30) 549-6838



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Telefax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: [www.naih.hu](http://www.naih.hu)

In the event of a violation of their rights, may also seek legal remedy directly against the Data Controller, which request shall be submitted to the court of the registered office of the Data Controller or the domicile or residence of the data subject.

If you need additional information beyond what is included in the cookie management information, you can request information via the contact information provided in point 1.

If you have comments or objections regarding the handling of your personal data, or if you would like to request information about the handling of your data, you can contact the representative of the data controller at [adatvedelem@mav-start.hu](mailto:adatvedelem@mav-start.hu).

**6. Relevant legislation:**

- 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);
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information;
- Act C of 2003 on electronic communications.

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Data Controller**