

**Privacy Policy on data processing
in connection with entering the Premium lounge of MÁV-START Zrt.**

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
 Hereinafter: **Data controller**

Contact details of the Data Protection Officer:

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

2. Informations about data processing

2.1. Verification of the data subject's eligibility to enter the Premium Lounge

2.1.1. Verification with visual verification

<i>The data subject</i>	All person, who is entitled to enter and stay in the Premium Lounge.
<i>The purpose of data processing</i>	The purpose of data management is to check the eligibility of the data subject to enter the Premium Lounge, during which the following will be viewed: a) travel document that entitles to enter (in particular, but not exclusively: international 1 st class ticket or domestic 1+ class ticket, Eurail, Interrail and European East Pass, 1 st or Business class seat ticket or sleeper car ticket, blind or wheelchair passenger and their companion ticket, war disabled ticket, START KLUB VIP card, supervision card), as well as b) if the travel document entitling to entry provides personal travel authorization (e.g. a personalised ticket), it is also necessary to view the identity document in order to establish the identity the passenger. Thus, the right to enter can also be established.
<i>Scope of processed data</i>	During the inspection, the data included in the travel document entitling to entry and – in the case of personal travel authorization – the personal identification document, which are necessary to establish the entry right and, in connection with this – in the case of personal travel authorization – the identity, are processed.
<i>The legal basis of data processing</i>	a) pursuant to Article 6 (1) (b) of GDPR data management is necessary to fulfil the contract between the Data Controller and the data subject. By purchasing a document entitling the person concerned to domestic or international travel are also acquires the right to enter the Premium Lounge, but the Company is entitled and obliged to check the right to enter. b) if conclusion can be drawn from the travel document that entitles to enter about the medical condition (such as blind, disabled in a wheelchair, war disabled) of the person concerned as special data, then the legality of the data management is ensured by Article 9 (2) f) of the GDPR, in addition to the provisions in point a), as special data is necessary for the establishment and enforcement of a legal claim.
<i>Duration of the data processing</i>	The duration of the data processing lasts until the insight the travel document that entitles to enter, or, if it necessary - if the travel document that entitles to enter provides personal authorization - access to the identity document. During or after the inspection - 2.1.2. with the exception contained in point - personal data will not be recorded.
<i>Source of processed data</i>	In order to enter the Premium Lounge, the data subject must present the travel document entitling to entry, and – if the travel document entitling to entry provides a person-related right – it is mandatory to provide access to the personal identification document, without it the Data Controller will refuse entry to the Premium Lounge.
<i>Method of data processing</i>	Data processing is only done manually by looking at the travel document that entitling to entry - if the travel document entitling to entry provides a person-bound right - and the personal identification document.

2.1.2. Keeping records in certain of entitling document to enter

<i>The data subject</i>	Those persons who are entitled to enter the Premium Lounge and prove the eligibility to enter the Lounge with a START CLUB VIP card or a Supervisory Card.
<i>The purpose of data processing</i>	<p>a) In the case of the START KLUB VIP card, the purpose of data processing is to record the fact of entry and the card number in an electronically kept register to ensure proper monitoring of use, regard to that the START CLUB VIP Card entitles you to enter the Premium Lounge twice a day and – in case of both entries – it entitles you to stay in it for maximum 1 hour.</p> <p>b) In the case of the Supervisory Card, the purpose of data processing is to record the fact of entry and the card number in an electronically kept register to ensure proper monitoring of use and to subsequently detect of misuse, regard to that the certificate primarily entitles to enter because of control purposes</p>
<i>Scope of processed data</i>	<p>a) In the case of using the START CLUB VIP Card, at the time of entry the START CLUB VIP Card number and the time of the entry are recorded.</p> <p>b) In the case of using Supervisory Card at the time of the entry the serial number of Supervisory Card and the time of the entry are recorded.</p>
<i>The legal basis of data processing</i>	<p>a) In case of START KLUB VIP card the legal basis of data processing is pursuant to Article 6 (1) (b) of GDPR, according to which data processing is necessary for the fulfillment of the contract between the Data Controller and the data subject. In view of the fact that the START KLUB VIP card entitles limited number of entries and limited time to stay in the Premium Lounge, therefore, it is necessary to record the data indicated below for verification and to avoid abuse.</p> <p>b) According to the Article 6 (1) (f) of GDPR, data processing is necessary to enforce the legitimate interest of the Data Controller, which is manifested in checking and filtering out abusive use of the Supervisory Card</p>
<i>Duration of the data processing</i>	<p>a) In the case of the START CLUB VIP card, personal data is processed until the end of the day, when enter the Premium Lounge.</p> <p>b) In the case of the Supervisory Card the duration of data processing is the end of the reference year.</p>
<i>Source of processed data</i>	At the time of the entry - if verify the access with a START CLUB VIP card or Supervisory Card – the data subject is obliged to provide the data for recording in the register, without it the entry to the Premium Lounge may be denied.
<i>The data processor</i>	The operation of the IT system which used by the Data Controller to keep the electronic records and the data storing server service are provided by MÁV Service Provider Zrt. (Headquarters: 1134 Budapest, Dévai utca 23.), thereby processing personal data in the name and for the benefit of the Data Controller.

2.2. Data processing related to the invoice issued when purchasing the ticket to the Premium Lounge

<i>The data subject</i>	Those person in whose name and address the Data Controller sells the entrance ticket to the Premium Lounge, and the customer request an invoice for the purchase.
<i>The purpose of data processing</i>	Issuing and keeping the invoice in accordance with the law.
<i>Scope of processed data</i>	Billing name, billing address (country, postal code, city, name and type of public space, house number, floor/door) and invoice data according to the VAT Act.
<i>The legal basis of data processing</i>	Compliance with a legal obligation pursuant to Article 6 (1) (c) of GDPR, which is defined in Sections 169-170 of Act CXXVII of 2007 on Value Added Tax (hereinafter: V.A.T) and Section 169 of Act C of 2000 on Accounting Tax.
<i>Duration of the data processing</i>	The retention period of accounting documents is 8 years according to Section 169 (2) of Act C of 2000 on Accounting Tax.
<i>Source of processed data</i>	In case of requesting an invoice, the data subject is obliged to provide the data necessary for issuing the invoice, otherwise the Data Controller will not be able to issue the invoice in accordance with the law.

<i>The data processor</i>	The invoices issued by the Data Controller are managed by MÁV Szolgáltató Zrt. (Headquarters: 1134 Budapest, Dévai utca 23.), thereby processing personal data in the name and for the benefit of the Data Controller.
<i>Recipient of the data transfer</i>	The Hungarian tax authority (National Tax and Customs Administration). <i>Purpose of data transfer:</i> fulfillment of data reporting obligations in accordance with law. <i>Legal basis of data transfer:</i> Compliance with a legal obligation pursuant to Article 6 (1) (c) of GDPR, which is prescribed by the V.A.T. Act.

3. Rights and enforcement options for data subject

Primarily, the data subject may request information about the right of data subject through the data controller's contact details provided in point 1. We inform, that the data subject can submit a request to exercise the right at any of the contact details of the data controller, however, we recommend to do it one of the contact details indicated in point 1.

The Data Controller shall provide the information in writing, in an easily understandable form, within the shortest possible time from the submission of the request, but not later than within one month. If it is 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. 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. Primarily the Data Controller shall comply the request as requested by the data subject. If the data subject submitted the request electronically – unless otherwise request by the data subject - the Data Controller shall provide the answer electronically.

The Data Controller shall ensure the exercise of the rights of the data subject for free. If the request for information is unfounded or – in particular due to its repetitive character - excessive, taking into account of providing the requested information or taking the action requested, the Data Controller may charge a reasonable fee for administrative 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.

3.1. 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 and legal basis of data processing, categories of personal data concerned by the processing, duration of data processing, recipient of data transfer, if available, rights related to data processing and possibilities of enforcing rights, right to lodge a complaint with a supervisory authority.

At the request of the data subject, the Data Controller shall provide him or her with a copy of the personal data undergoing processing, insofar as this does not adversely affect the rights and freedoms of others. The Data Controller shall provide the copy requested by the data subject for the first time free of charge, and for each further copy the Data Controller may determine a reimbursement of costs.

3.2. Right to amend, rectify and complete data

The data subject may request the modification (correction) of inaccurate personal data concerning him or her or the completion of incomplete personal data through the contact details provided in point 1. The Data Controller shall notify the data subject of the rectification.

3.3. 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 specified deadline for storing the data has expired, or if it has been ordered by a court or authority. The Data Controller shall notify the data subject of the deletion of personal data. The notification shall be omitted if this does not violate the legitimate interest of the data subject with regard to the purpose of data processing. 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

3.4. 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.

3.5. 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. This right may be exercised in the case of data processing carried out in connection with the Supervisory Pass indicated in Section 2.1.2 of this Privacy Policy. 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 Management contained in this Privacy Policy and refuses to present the identity document, which is necessary to establish his or her age, the Data Controller shall refuse to sell the alcoholic beverage to the data subject.

3.6. Right to appeal

3.6.1. Right to lodge a complaint

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 any of his rights, he or she may lodge a complaint with the National Authority for Data Protection and Freedom of Information 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
Telefax: +36 (1) 391-1410
E-mail: ugyfelszolgalat@naih.hu
Website: www.naih.hu

3.6.2. Right to a judicial remedy

If the data subject does not agree with the data processing carried out by the Data Controller or considers that the data controller has violated one of his rights, the data subject 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. The court shall deal with the case as a matter of priority.

3.6.3. Right to turn to the Data Controller

If the data subject has any comments, objections or would like to request information about the processing of his or her personal data, then he or she may do so at the adatvedelem@mav-start.hu contact details. If you would like more information about the rights of data subjects provided by MÁV-START Zrt., how to exercise data subjects' rights and the details of assessing the application, please visit our website (<https://www.mavcsoport.hu/en/mav-start/introduction/rights-data-subject-and-their-enforcement>).

4. 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 CXXVII of 2007 on Value Added Tax
- Act C of 2000 on Accounting Tax

**MÁV-START Co.
Data Controller**