

Privacy Notice on the personal data processing of the websites
of MAHART PassNAVE Kft www.mahartpassnave.hu, www.mahartports.hu
and mahartttours.hu

1. Purpose of the policy:

Mahart PassNave Kft / 1056 Budapest, Belgrád rakpart, International Port / Hereinafter: Company / as controller, carries out its activities relating data processing according to the provisions of the Regulation of the European Parliament and of the Council 2016/679 ('GDPR') The purpose of the Notice is for visitors and customers visiting the www.mahartpassnave.hu, www.mahartports.hu or www.mahartttours.hu websites of the Company to receive information regarding the data processed by the Company during the operation of its websites, and additional activities arising in relation to data processing. The terms used in this Notice correspond to the terms defined in EU Regulation 2016/679 ('GDPR').

2. Definitions:

- 'personal data': 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.
- 'processing': any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 'restriction of processing': the marking of stored personal data with the aim of limiting their processing in the future.
- 'profiling': any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- 'pseudonymisation': the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
- 'filing system': any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis; 7. 'controller': the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union

or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law; 8. 'processor': a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

- 'recipient': a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data within the framework of a particular 4.5.2016 EN Official Journal of the European Union L 119/33 inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- 'third party': a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
- 'consent of the data subject': any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- 'personal data breach': a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transferred, stored or otherwise processed.
- 'genetic data': personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question.
- 'biometric data': personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data.
- 'data concerning health': personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.
- 'main establishment': a) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation; b) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation.

- ‘representative’: a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation.
- ‘enterprise’: a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity.
- ‘group of enterprises’: a controlling enterprise and its controlled enterprises.
- ‘binding corporate rules’: personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity.
- ‘supervisory authority’: an independent public authority that is established by a Member State pursuant to Article 51.
- ‘supervisory authority concerned’: a supervisory authority which is concerned by the processing of personal data because: a) the controller or processor is established on the territory of the Member State of that supervisory authority; b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or c) a complaint has been lodged with that supervisory authority.
- ‘cross-border processing’: a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.
- ‘relevant and reasoned objection’: an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union.
- ‘information society service’: a service as defined in point (b) of Article 1 (1) of Directive (EU) 2015/1535 of the European Parliament and of the Council.
- ‘international organisation’: an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

3. Basic principles relating to the processing of personal data:

The Company processes personal data lawfully and fairly, purposefully, with data minimisation, accurately, with limited storage, confidentiality and in an accountable and transparent manner for the data subject.

The personal data:

- can only be collected for specific, clear and legitimate purposes.
- can only be processed in a manner compatible with these purposes.
- must be appropriate and relevant.
- must be limited to the minimum necessary.
- must be accurate and, if required, up-to-date.
- must be stored in such a way as to allow the identification of the data subjects only for the time needed to fulfil the purpose of the personal data processing.
- must be adequately secured during the processing of the data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage of data.

4. Data processing taking place during the purchase of a ticket through the websites:

Data collection facts and the purpose of data processing: Any external visitor can access the sales surface operated on the Company's websites and the information provided by the Company. The purpose of the data processing is to ensure the proper registration of an order, and to issue an invoice complying with the accounting requirements.

Data subjects: Visitors and customers registered on the website for the purpose of buying a ticket.

Processed data: Date, time, company name, last name, first name, e-mail address, address, tax number.

Legal ground of data processing: In the case of fulfilling an order or registration Article 6 (1) a) of EU Regulation 2016/679 ('GDPR') and Section 13/A (3) of Act CVIII of 2001 on certain issues of e-commerce services as well as services related to information society. In the case of accounting document generation Article 6 (1) c) of EU Regulation 2016/679 ('GDPR').

Duration of data processing: When the erasure request is received, personal data will be erased immediately. In the case of accounting document generation, 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting.

Controllers authorised to access personal data, and recipients of the personal data: The personal data provided during the registration can be processed by the employee who is responsible for managing marketing activity and by the staff of the data processing company entrusted with the operation of the website

5. Data processing taking place during the purchase of a gift voucher through the website:

Data collection facts and the purpose of data processing: Any external visitor can access the sales surface operated on the Company's websites and the information provided by the Company. The

purpose of the data processing is to ensure the proper registration of an order during the purchase of a gift voucher, and to issue an invoice complying with the accounting requirements.

Data subjects: Visitors and customers registered on the website for the purpose of buying a gift voucher

Processed data: Date, time, company name, last name, first name, mobile number, gift voucher serial number, travel date

Legal ground of data processing: In the case of fulfilling an order or registration Article 6 (1) a) of EU Regulation 2016/679 ('GDPR') and Section 13/A (3) of Act CVIII of 2001 on certain issues of e-commerce services as well as services related to information society. In the case of accounting document generation Article 6 (1) c) of EU Regulation 2016/679 ('GDPR').

Duration of data processing: When the erasure request is received, personal data will be erased immediately. In the case of accounting document generation, 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting.

Controllers authorised to access personal data, and recipients of the personal data: The personal data provided during the registration can be processed by the employees of the controller who are responsible for managing marketing activity and by the staff of the data processing company entrusted with the operation of the website.

6. Data processing performed during the sending of newsletters

Data collection facts and the purpose of data processing: When registering on the Company's websites, the user can provide prior consent for the Company to contact them with their current promotions by sending them electronic or paper-based newsletters to the contact details provided during registration. In the absence of registration, the Company shall not send an advertisement message, a registered user can unsubscribe from the newsletter in person, by e-mail or by phone. To register a newsletter, you need to accept the privacy statement indicated on the website.

Data subjects: Visitors providing consent on the website to the sending of newsletters.

Processed data: Date, time, last name, first name, e-mail address, phone number.

Legal ground of data processing: In the case of subscription to the Newsletter, Article 6 (1) a) of EU Regulation 2016/679 ('GDPR') and Section 6 (5) of Act XLVIII of 2008 on the basic requirements of and certain restrictions on commercial advertising activity.

Duration of data processing: When the erasure request is received, personal data will be erased immediately.

Controllers authorised to access personal data, and recipients of the personal data: The personal data provided during the registration can be processed by the employees of the controller who are responsible for managing marketing activity

7. Personal data processing during application for a loyalty card:

Data collection facts and the purpose of data processing: The Company operates a loyalty group aimed at providing individual discounts to its regular customers and family members living in the household, personalised offers and direct notification on the Company's current offers and promotions.

Data subjects: Individuals submitting applications for a loyalty card through the website.

Processed data: last name, first name, e-mail address, phone number.

Legal ground of data processing: Article 6 (1) a) of EU Regulation 2016/679 ('GDPR').

Duration of data processing: Until withdrawal of the data subject's consent.

Controllers authorised to access personal data, and recipients of the personal data: The personal data provided during the submission of a quality complaint can be processed by the employees of the controller who are responsible for managing marketing activity.

8. Individuals authorised to erase, rectify or restrict the processing of personal data:

- Marketing Manager of Mahart PassNave Postal address: 1066 Budapest, Belgrád rakpart, International Port.
E-mail address: ertesites@mahartpassnave.hu Phone number: +36 1 484 4013

9. Data processing and joint data handling during the operation of the website:

During the operation of the website, the controller shall only use additional processors or joint controllers who provide guarantees of compliance with the requirements of EU Regulation 2016/679 and the implementation of appropriate technical and organisational measures to ensure the rights of data subjects. During data processing and joint data handling, the Parties have defined, in the written agreement between them, the distribution of their responsibilities for the fulfilment of obligations, in particular those relating to the exercise of the rights of the data subject, in a transparent manner. The Company uses the following processors and joint controllers for the purpose of operating the website:

- Technical background support for website operation: Travelgate Kft, 1094 Budapest, Páva utca 8 GBart Design Stúdió Kft Budapest, Frankel Leó u 45.
- Storage facility service: BIT Hungary Kft Budapest, Budakeszi út 51, Ace Telecom Kft. 1037 Budapest, Zay u. 3.
- Online invoice settlement, webshop operation: Complog MRC Kft Budapest, Varjú u 48.

10. Using the Google Analytics application:

- During the operation of the Website, a controller uses the Google Analytics application, a Google Inc. ('Google') web analytics service. Google Analytics uses text files, so-called 'cookies', that are saved to your computer to help analyse the use of a website visited by the User.
- Information generated by cookies associated with a website used by the User is usually saved and stored on one of Google's US servers. By activating IP anonymization on a website, Google shortens beforehand the IP address of the User within the Member States of the European Union or in other states party to the Agreement on the European Economic Area.
- The sending of the entire IP address to Google's US server and its shortening there is only done in exceptional cases. On behalf of the operator of this site, Google will use this information to evaluate how the User used the website, as well as to provide the website operator with reports related to the activity of the website and to perform additional services related to website and internet usage.
- In Google Analytics, the IP address transferred by the User's browser is not linked with other Google data.
Storage of cookies can be prevented by setting the User's browser correctly.
The User may prevent Google from collecting and processing cookie information (including the IP address) of the User's website usage by downloading and installing the browser plug-in available on the following link.

<https://tools.google.com/dlpage/gaoptout?hl=hu>

11. Further rights of individuals affected by data processing:

- **Access rights**

The individual affected by data processing has the right to receive notification from the controller regarding whether or not their personal data are being processed, and if they are, the data subject has the right to access the personal data collected by the controller.

- **Right to rectification**

The individual affected by the data processing has the right to request the controller to rectify inaccurate personal data concerning them without any undue delay. Taking into account the purposes of the processing, the individual affected by data processing has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

- **Right to erasure**

The individual affected by the data processing has the right to request the controller to erase their personal data without any undue delay, and the controller is obligated to erase the personal data immediately in accordance with the terms and conditions set out in Article 17 (1) of EU Regulation 2016/679.

- **Right to be forgotten**

Where the controller has made the personal data public and is obligated to erase them, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the individual affected by the data processing has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

- **Right to restriction of processing**

The individual affected by the data processing has the right to request the controller to restrict the processing of their personal data if any of the following criteria apply:

- the accuracy of the personal data is contested by the individual affected by the data processing, the restriction shall apply to the time period necessary for the controller to verify the accuracy of the personal data
- the data processing activity has no legal basis, and the individual affected by the data processing does not consent to the erasure of the data but requests the restriction of their use
- the Controller no longer needs the personal data for data processing purposes, but the individual affected by the data processing requests the data for the submission, enforcement or protection of legal claims
- the individual affected by the data processing objected to data processing; in such cases, the restriction shall only apply to the time period necessary to determine whether the controller's justified needs precede the justified needs of the individual affected by the data processing.

- **Right to data portability**

The individual affected by the data processing shall have the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and has the right to transfer those data to another controller without hindrance from the controller to whom the personal data have been provided, if the data processing is based on consent pursuant to Article 6 (1) a) of EU Regulation 2016/679 and the data is processed in an automated form.

- **Right to objection**

The individual affected by the data processing shall have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on Article 6 (1) a) of EU Regulation 2016/679, including profiling based on the referenced provisions. In this case, the controller must cease the processing of the personal data.

- **Automated individual decision-making, including profiling**

The individual affected by the data processing has the right to excuse themselves from the force of resolutions that are based exclusively on automated data management (including profiling) and would have legal effect on them or would affect them in any other way of similarly significant extent.

The previous paragraph shall not apply if the decision:

- is made necessary for making or fulfilling a contract between the individual affected by the data processing and the data managing party
- is made possible by legislation of the European Union or a member state thereof, which includes effective provisions for the protection of the rights, freedoms and legitimate interests of the individual affected by the data processing or
- is based on the explicit consent of the individual affected by the data processing.

12. Security of processing:

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing, as well as the risk of varying likelihood and severity of the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) the pseudonymisation and encryption of personal data,
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

13. Notification of the data subject of a personal data breach, and reporting of the breach to the supervisory authority:

The controller shall without undue delay, or by no later than 72 hours after having become aware of it, notify the competent supervisory authority of the personal data breach, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

If the personal data breach is likely to result in a high risk to the rights and freedoms of the data subjects, the controller shall notify the data subject of the personal data breach without undue delay.

14. Legal remedy options and deadlines for action:

The controller will investigate the complaint and provide written information as promptly as possible, or at the latest within 25 days from the submission of the claim. If inaccurate personal data is recorded by the controller, the controller shall rectify the discrepancies, provided that the accurate data are made available to them.

The controller erases the personal data if:

- it is processed unlawfully
- it is incomplete or inaccurate and cannot be lawfully rectified
- it is requested by the data subject
- the purpose of processing no longer exists or the legal time limit for storage has expired
- ordered by a court or authority

Rights of data subjects in relation to data processing:

- The data subject may request access to the data processed by the controller that relate to them, the rectification or erasure of the data or the restriction of processing
- The data subject may object to the processing of their personal data through the contact channels provided in this Notice.
- The data subject is entitled to have access to their personal data pursuant to the rules of data portability, and also has the right to withdraw consent to the processing of the data that was provided during the registration.

In the event that the rights of the individual affected by the data processing are violated, they may turn to the Authority here below:

- National Authority for Data Protection and Freedom of Information: 1530 Budapest, Szilágyi Erzsébet fasor 22/C
 - Phone number: +36-1-391-1400
 - E-mail: ugyfelszolgalat@naih.hu
-
- I confirm that I have read the notice relating to data processing and hereby consent to the processing of my personal data for the purpose of ticket purchase.
 - I confirm that I have read the notice relating to data processing and hereby consent to the processing of my personal data for the purpose of gift voucher purchase.
 - I confirm that I have read the notice relating to data processing and hereby consent to the forwarding of newsletters by e-mail or by post.
 - I confirm that I have read the notice relating to data processing and hereby consent to the processing of my personal data in the customer loyalty database.