

DATA PROTECTION POLICY

National Toll Payment Services Private Company Limited by Shares

Preamble

National Toll Payment Services Plc. – (Company registration number: 01-10-043108, Tax number: 12147715-2-44, Registered seat: H - 1134Budapest, Váci út 45. block “B”, hereinafter: NTPS Plc.) – operates not only the www.nemzetiutdij.hu website, but also the www.hu-go.hu, and <https://ematrix.autopalya.hu/> web pages.

Pursuant to Section 1 (2) of Government Decree No. 209/2013 (VI.18.) on the implementation of Act LXVII of 2013 on Distance-based Tolls, payable for the use of motorways, expressways and main roads, the Government appoints NTPS Plc. as *the toll charger, toll control supporter, and bound toll service provider*.

Pursuant to Article 6 of Act I of 1988 on Road Transport, NTPS Plc. is responsible for collecting the *user charges on national main roads and for running and operating the enforcement facilities*.

NTPS Plc. hereby publishes its Data Protection Policy, which is also Information on Data Processing (hereinafter: Policy), the contents of which are bound to NTPS Plc., acting as data controller and data processor.

NTPS Plc. controls the personal data supplied and stated during the personal registration by motorists, in full compliance with the currently effective legal regulations, in line with the criteria of fairness and lawfulness, based on the principle of the performing purposeful activities, in order to exercise the rights and fulfil the obligations required in relation to its tasks and competence, to the extent and for the period required for attaining that objective.

The data types stated in this Policy are controlled, in line with the principle of data economy, to the extent that is absolutely necessary for using the services of NTPS Plc., for performing its legal obligations, for performing tasks in the public interest and for entering into a contracts with the parties concerned.

1. Purpose of the Policy

The purpose of this Policy is to lay down the data protection and control principles of NTPS Plc. and its data protection and data control policy.

The Policy also intends to ensure that the rights of all parties concerned (hereinafter: customer) irrespective of their origin or place of residence, including especially their right to

private life, should be respected in each aspect of the services supplied by NTPS Plc., particularly in the course of controlling personal data.

NTPS Plc. developed this Policy by taking into account particularly the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Privacy Act), Act V of 2013 on the Civil Code (hereinafter: Civil Code), Act CVIII of 2001 on Particular Issues of E-Commerce Services and Services related to the Information Society, Act VI of 1998 on the Promulgation of the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, prepared in Strasbourg on 28 January 1981, the provisions of the Directive of the European Parliament and Council No. 95/46/EC of 24 October 1995 on the flow of personal data, as well as the applicable position statements and decisions of the Hungarian National Authority for Data Protection and Freedom of Information, and the National Media and Infocommunications Authority.

The data control activities of NTPS Plc. are based on the rules of law and position statements of the regulatory authorities referred to above.

2. Scope of personal data managed by NTPS Plc.

NTPS Plc. manages personal data in its distance-based HU-GO electronic toll payment system (hereinafter: HU-GO system) depending on the possible payment methods:

2.1. E-toll payment

Road usage authorisation may be acquired by registered customers, after log-in into the distance-based electronic toll payment system (hereinafter: HU-GO). In the course of the registration process,

the system records the following data, as part of the registration, when the customer purchases a route ticket, or a new on-board unit or in relation to an existing on-board unit:

- Identification data: name, e-mail address, password, identification data, billing data – name, billing address, tax number –, telephone number (personal or company), VAT(value-added tax) ID, mailing address, name, phone number and email address of the contact person
- Unique identification number of on-board unit if you already have one,
- Vehicle data: registration plate number, country code, environmental protection category, number of axles, size and weight (weight, length, height, width, axle weight),
- If you already have a contractual relationship with a logistics service provider, the name of the logistics service provider and the number of the contract.

Road usage authorisation may be obtained even without customer registration in the HU-GO system (road usage authorisation may be obtained only by purchasing an ad hoc route ticket on the <https://hu-go.hu/roadtolls/alkalmivasarlas> webpage), in which case the customer

enters the following data:

- Vehicle data: registration plate number, country code, vehicle category, environmental category, number of axles, size and weight (weight, length, height, width, axle weight)

2.2. E-vignette purchase

When the customer purchases road usage authorisation (e-vignette) for the expressways and toll roads of Hungary, the customer enters the personal data listed in point 2.1. in the registration process (with the exception of the following: environmental category, size and weight (weight, length, height, width, axle weight)).

NTPS Plc. retains the right to modify the data, absolutely required for customer registration in order to use a service, even without amending this Policy. In this case the provisions of the currently effective Policy shall be applied.

By recording their data, the customers declare being individuals over the age of 18, and in full capacity of action; when they represent legal entities or other organisations, then the individual recording the data declares being authorised to represent the individual or organisation to grant consent to data control and data processing regulated in this Policy.

With the registration (and recording their personal data), the customer accepts this Policy as binding.

With the recording/supplying the data, the customer's consent, based on prior information, to data control and data processing pursuant to this Policy shall be considered granted.

The scope of this Data Protection Policy and the customer's consent to the control and processing of their data extends also to the use of any service referred to above through a mobile application.

3. Disposal over personal data

3.1. Customers may request information in writing from NTPS Plc. on the control of their personal data by sending a letter through registered mail or registered mail with confirmed receipt to the address of NTPS Plc. (address: H – 2101 Gödöllő Pf.:148), or an e-mail message to the customer services stated below: E-mail message sent by customers in relation to the e-vignette: ugyfel@nemzetiutdij.hu E-mail message sent by customers in relation to HU-GO: ugyfel@hu-go.hu. NTPS Plc. considers any request for information sent by letter

authentic and suitable for assessment when the customer can clearly be identified from the submitted request. NTPS Plc. deems any request for information sent via e-mail authentic and suitable for assessment when the customer sends it from the registered e-mail address to one of the e-mail addresses specified in this section.

3.2. Former (deleted) data can no longer be recovered after requests for the deletion or modification of personal data, sent to the e-mail addresses specified in Section 3.1., have been fulfilled.

4. Scope of other data managed by NTPS Plc.

4.1. NTPS Plc. retains the right to disclose and to forward to third party statistical data, i.e. data not deemed personal data (anonymised data) collected from its visitors, users and customers and concerning the structure of its digital databases in compliance with the provisions of the legal regulations.

The use of data in a statistically aggregated form, which may not contain in any form the name or any other data suitable for the identification of the individual concerned, therefore is not deemed data control or data transfer or data transmission to the definitions of the Privacy Act.

4.2. By accepting this Policy, the customer gives is prior consent to the forwarding by NTPS Plc. any of their data, recorded through the website of NTPS Plc. or in any other data registration method, or the e-mail address, sent to the Customer Service Office of NTPS Plc., to market research companies, for purposes other than commercial purposes and for the purpose of information supply and satisfaction surveys in relation to the achievement of social objectives, which are not classified as advertisement.

5. Legal grounds, purpose and method of data management

5.1. The data control stated in this Policy is based on the voluntary and prior consent of the customers of NTPS Plc., granted on the basis of the information stated in this Policy. The legal basis of data control activities consists of the rules of law and position statements referred to in the Preamble.

The Privacy Act specifies its scope as: **this act shall apply** to all data control and data processing activities conducted in Hungary relating to the data of natural persons. The provisions of the Privacy Act shall apply to both data control and data processing, carried out wholly or partly, by automated means, as well as naturally.

According to the definition of the Privacy Act: “**personal data** shall mean data relating to the data subject, in particular by reference to the name and identification number of the data subject or one or more factors specific to his physical, physiological, mental, economic,

cultural or social identity as well as conclusions drawn from the data in regard to the data subject”.

The Privacy Act also defines data control. According to that definition “**data control** shall mean any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronizing or connecting, blocking, deleting and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans)”.

When the technology applied by NTPS Plc. is used, the registration plate number of the vehicles will be recorded, which may constitute personal data when it may be associated with a specific natural person.

5.2 The purpose of data control is to use the services of NTPS Plc. defined in the Preamble through its websites, to prepare statistics and to develop the technology of the information system.

5.3 NTPS Plc. does not verify the authenticity of the personal data supplied or recorded by the customer in the course of registration. Only the natural person or legal entity supplying the data is responsible for their adequacy.

5.4 When any customer provides an e-mail address, they also undertake that only they will use services from the specified e-mail address. In view of that responsibility, any responsibility associated with any log-in made from the specified e-mail address shall lie with the customer who registered the e-mail address.

6. Principles of special data control at NTPS Plc.

6.1. Pursuant to the Privacy Act, personal data may be processed only for specified and explicit purposes, where it is necessary for the exercising of certain rights and fulfilment of obligations. The purpose of processing must be satisfied in all stages of data processing operations; recording of personal data shall be done under the principle of lawfulness and fairness.

The personal data processed must be essential for the purpose for which they were recorded, and they must be suitable to achieve that purpose. Personal data may be processed to the extent and for the duration necessary to achieve its purpose

Data may be acquired and processed only honestly and lawfully.

6.2. The personal data processed must be essential for the purpose for which they were recorded, and they must be suitable to achieve that purpose. Personal data may be processed to the extent and for the duration necessary to achieve its purpose.

6.3. The data must be proportionate to the purpose of their storage and must comply with that purpose, without extending beyond it.

6.4. NTPS Plc. takes the required security measures in order to protect personal data stored in automated data files and to prevent any accidental or unlawful destruction or accidental loss of data, or any unlawful access or alteration or distribution of data.

6.5. Whenever NTPS Plc. intends to use the supplied data for any purpose other than the intended purpose, it shall inform the customer and obtain prior expressed consent from the customer for that, providing also an opportunity for the customer to prohibit the use of data for such purposes.

6.6. Personal data shall be blocked by NTPS Plc. if so requested by the data subject, or if there are reasonable grounds to believe that erasure could affect the legitimate interests of the data subject. Blocked personal data shall be processed only as long as the purpose which prevented their erasure prevails. NTPS Plc. notifies the customer concerned, as well as any other party to whom the data were transferred earlier for the purposes of control when their controlled personal data have been rectified, blocked, or erased. Notification is not required if it does not violate the rightful interest of the customer concerned in light of the purpose of processing.

7. Erasing data, information supply

7.1. The personal data will be controlled until the customer de-registers the service with the specified user name and simultaneously requests the data to be erased. The customers may send a request to erase their data in a letter, sent by post to the following address: H – 2101 Gödöllő P.O.Box 148, or to any of the e-mail addresses specified in Section 3.1., depending on the subject of the data. NTPS Plc. will erase the data within 10 working days from the receipt of such a request.

If NTPS Plc. refuses to comply with the data subject's request for rectification, blocking or erasure, the factual or legal reasons on which the decision for refusing the request for rectification, blocking or erasure is based shall be communicated in writing within 30 days of receipt of the request. Where rectification, blocking or erasure is refused, the data controller shall inform the data subject of the possibilities for seeking judicial remedy or lodging a complaint with the Hungarian National Authority for Data Protection and Freedom of Information in relation to the matter.

7.2 The customer may object to the control of their personal data pursuant to Article 21 of the Privacy Act.

7.3. NTPS Plc. must comply with requests for information without any delay, and provide the information requested, at the data subject's request, within no more than 30 days. NTPS Plc. informs the data subject when it refuses the supply of information by referring to the provision of the law based on which information is denied; simultaneously it also informs the

data subject of the possibilities of legal remedy in court, and that the data subject may turn to the Hungarian National Authority for Data Protection and Freedom of Information in relation to the matter.

8. Data transmission

8.1 NTPS Plc. as data controller is entitled and obliged to transmit any personal data available and regularly stored by it to the competent authorities, the transmission of which is its legal obligation, imposed by the law or in an effective resolution. NTPS Plc. is not liable for such data transmission or any consequences thereof.

8.2. If NTPS Plc. passes on the content supply on its web pages and the operation or utilisation of the storage location to a third party either in part, or in full, it may also transfer all the data controlled by it to such third party for further data control without any specific consent.

9. Amendment of the Policy

NTPS Plc. retains the right to unilaterally amend this Policy at any time, by disclosing the amendments on its website, without any prior or subsequent notification sent to the customers.

10. Legal remedy options

The customer may seek legal remedy in court pursuant to the provisions of the Privacy Act and the Civil Code and may also request a position statement from the Hungarian National Authority for Data Protection and Freedom of Information in any matter concerning personal data.

11. Data protection register ID numbers:

Operation of e-customer service and website, registration number: 40099
Registration on the HU-GO website, registration number: NAIH-66320/2013
Collection of overdue motorway toll, registration number: 464-0002

12. Effective date

This Policy will enter into force on 01.01.2015.