

**Fótaxi Zrt.**  
1087 Budapest, Kerepesi út 15.

# **PRIVACY POLICY**

Budapest, 29<sup>th</sup> July 2021 (Date of last amendment)

## **1. INTRODUCTION**

**The Főtaxi Autóközlekedési és Szolgáltató Zártkörűen Működő Részvénytársaság** (1087 Budapest, Kerepesi út 15., 1087 Budapest, Hungary, tax number: 10873498-2-42), pays special attention to ensuring fair, transparent and lawful data processing. The Company is committed to comply with all data processing requirements set out in the European Union's General Data Protection Regulation (hereinafter: "GDPR").

The principles and practices of **Főtaxi Autóközlekedési és Szolgáltató Zártkörűen Működő Részvénytársaság**, as the Taxi Service Organiser, in the performance of the passenger transport services for the Customer under the Service Contract, regarding the processing of personal data, the purpose, legal basis and duration of the processing, as well as the ways and means of exercising the rights of the persons concerned in the processing, and the remedies are summarised in this Policy.

The personal data collected in the course of its operations will be treated confidentially by the controller in accordance with national and Member State data protection laws, as described in this Privacy Policy. Főtaxi Zrt. undertakes to ensure the security of the data, to take technical measures to ensure that the data recorded, stored and processed are protected and to take all necessary measures to prevent their destruction, unauthorised use and unauthorised alteration. It also undertakes to require any third party to whom it may transmit or transfer the data to comply with its obligations in this respect.

### **1.1. THE CONTROLLER AND ITS CONTACT DETAILS:**

Name of the controller: **Főtaxi Zrt.** (hereinafter referred to as: „**Controller**”)  
Seat: 1087 Budapest, Kerepesi út 15.  
Mailing address: 1087 Budapest, Kerepesi út 15.  
E-mail address: titkarsag@fotaxi.hu  
Telephone number: +36 1 422 2104

### **1.2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER:**

Name: Barna Zsóka  
Address: 1087 Budapest, Kerepesi út 15.  
E-mail address: barna.zsoka@fotaxi.hu  
Telephone: +36 2028950012

## **2. DEFINITIONS**

1. ‘*personal data*’ means 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;
2. ‘*processing*’ means 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;

3. '*controller*' means 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;
4. '*processor*' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
5. '*recipient*' means 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 in the framework of a particular 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;
6. '*consent*' of the data subject means 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;
7. '*personal data breach*' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
8. '*profiling*' means 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;

### **3. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA**

Personal data shall be:

- 3.1.** processed lawfully, fairly and in a transparent manner in relation to the data subject (*'lawfulness, fairness and transparency'*);
- 3.2.** collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes (*'purpose limitation'*);
- 3.3.** adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (*'data minimisation'*);
- 3.4.** accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which

they are processed, are erased or rectified without delay (*'accuracy'*);

- 3.5. kept in a form which permits identification of data subjects for no longer than necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (*'storage limitation'*);
- 3.6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (*'integrity and confidentiality'*).

The controller shall be responsible for, and be able to demonstrate compliance with the above (*'accountability'*).

The controller shall not use the personal data provided for purposes other than those set out in this Privacy Policy. The controller does not control the personal data provided to it. The person providing the data (hereinafter referred to as the "Data Subject") is solely responsible for the correctness of the data provided.

In addition to the cases provided for in this Privacy Policy, the transfer of personal data may only take place in cases provided for by law or with the consent of the data subject.

#### **4. CERTAIN DATA PROCESSING IN RELATION TO THE SERVICE CONTRACT**

The fact of data collection, the **scope of data processed and the purpose and legal basis of data processing:**

<b>Recorded data type</b>	<b>Purpose of data processing</b>	<b>Legal basis of data processing</b>
Data required for picking up a car: - <i>Name,</i> - <i>phone number,</i> - <i>ordering address or, in the case of ordering a taxi via a mobile application, the user's geographical location</i> - <i>drop-off time</i> - <i>voice of the caller when ordering by phone</i>	Exercise of rights and obligations arising from the service contract, performance of the passenger transport service.	Performance of contractual obligations, legitimate interest of the controller, legal obligation, consent of the data subject.
Data provided during the pick-up process: - <i>destination,</i> - <i>payment method.</i>	To facilitate the performance of the contract, the passenger transport service.	Performance of contractual obligations, consent of the data subject and legitimate interest of the controller.

Data set in the E-card interface: - <i>user name and password,</i> - <i>phone number,</i> - <i>e-card details /serial number, PIN, cost centre, card user name/.</i>	Exercise of rights and obligations arising from the service contract, performance of the passenger transport service.	Performance of contractual obligations, consent of the data subject and legitimate interest of the controller.
Data storage resulting from the transport: - <i>Transaction date</i> - <i>Acceptor (taxi FM code)</i> - <i>Date of order</i> - <i>Date of drop-off</i> - <i>Order coordinates</i> - <i>Start of ride</i> - <i>Departure (departure address)</i> - <i>End of journey</i> - <i>Arrival (arrival address)</i> - <i>Distance travelled (km)</i> - <i>Status (indicates the status of each transaction)</i> - <i>Net amount (Ft)</i> - <i>VAT (Ft)</i> - <i>Amount (gross Ft)</i> - <i>Route</i>	Exercise of rights and obligations arising from the service contract, performance of the passenger transport service.	Performance of contractual obligations, consent of the data subject and legitimate interest of the controller, legal obligation.

In the case of services provided directly by taxi drivers under the franchise contract with Főtaxi Zrt., by boarding a taxi waiting at a taxi rank for the purpose of travel, by stopping a taxi with free signals or by boarding a taxi waiting with free signals, data processing is only carried out if the passenger uses a pre-paid card of Főtaxi Zrt. that can be loaded or refers to a contract between Főtaxi Zrt. and its partners (e.g. pays with a taxi card provided by Főtaxi).

Processing in the context of passenger transport may be necessary for the purposes of legitimate interests of the controller for various legal, personal, administrative and management purposes. Processing based on legitimate interest may only take place if the legitimate interest shows that the processing for the purposes in question is in the legitimate interest of the controller and does not result in a disproportionate harm to the interests or fundamental rights and freedoms of the data subjects.

#### **4.1. The data subjects concerned by the processing:**

The party contracting with the controller; and the person authorised by the contracting party to use the passenger transport service.

#### **4.2. Duration of data processing, deadline for deletion of data:**

The data controller is authorized to process the data by the provider pursuant to Article 16 Section (3) of Government Decree No. 176/2015 (VII. 7.) on the carriage of passengers by road for reward and Article 4 Section (5) of the Municipal Council of Budapest 31/2013 (IV. 18.) on the conditions of operation of passenger taxi services and the service intermediating and organizing passenger taxi services, the establishment and use of taxi stations and the official price of taxi services, according to which the taxi service organizer is obliged to record the order and telephone calls - including the order, its acceptance and its

transmission to the driver of the taxi performing the task - in electronic form and to keep them for at least 3 months from the date of recording.

The data provided by the user on the website or in the Főtaxi application, either mandatory or voluntary, will be stored until the user initiates the cancellation of his/her registration, i.e. until he/she withdraws his/her consent to data processing. When deleting the registration initiated by the user the data controller will delete the data previously provided by the user within 5 working days at the latest, unless their retention is required by law (e.g. for accounting purposes) or if it is necessary for the legitimate interest of the data controller (e.g. for complaint handling or fraud prevention purposes).

We will keep all documents and business correspondence relating to the order until the end of the limitation period for any legal claims arising from the complaint after the order has been fulfilled.

Invoices issued in connection with contracts are stored by the data controller (pursuant to Article 169 Section (2) of Act C of 2000 on Accounting) for 8 years, after which they are destroyed or anonymised.

If, within the storage period, official or judicial proceedings are instituted or the limitation period is otherwise interrupted for the enforcement of rights and obligations arising from the contracts concerned, the storage period shall continue until the final conclusion of those proceedings, including the exhaustion of all remedies, or until the end of the limitation period.

#### **4.3. The identity of the potential controllers of the data, the recipients of the personal data:**

Personal data are primarily accessible to the controller's employees, while the data necessary for invoicing purposes are accessible to the controller's accounting partner, to the extent necessary for the performance of his/her work, in compliance with the above principles. The data entered or received in the e-card interface may be accessed by the sales manager, the deputy sales manager, the sales assistant, the taxi service manager and the customer service team leader of Főtaxi Zrt.

#### **4.4. Personalised offers, profiling:**

The data controller creates a profile regarding the travel habits, which helps the data subject to receive personalised offers. Profiling helps the Data Controller to provide its passengers with a faster taxi service. Legal basis for profiling: the data subject's consent (Article 6 section (1) point a) of the GDPR), for profiling the Data Controller uses and processes the name, telephone number and order address of the data listed in the table above, which were provided during the ordering process. Based on the profiling, the recommendation system offers a list of departure addresses that are presumed to be the most suitable for the passenger, based on the data processed, in the case of telephone bookings. The possible consequence of not providing the data is that the passenger will not be able to use the convenience service of automatic ordering of addresses.

### **5. PROCESSORS (WHO CARRY OUT PROCESSING ON BEHALF OF THE CONTROLLER)**

The controller uses data processors to facilitate its own data processing activities and to fulfil its contractual and legal obligations with data subjects.

The controller shall place great emphasis on using only processors that provide adequate guarantees to implement appropriate technical and organisational measures to ensure compliance with the requirements of national and Member State law on data processing and to protect the rights of data subjects.

The processor and any person acting under the control of the controller or the processor who has access to personal data shall process the personal data covered by this Policy only in accordance with the instructions of the controller.

The controller is legally responsible for the activities of the processor. The processor shall be liable for damage caused by the processing only if it has failed to comply with the obligations expressly imposed on processors by law or if it has disregarded or acted contrary to lawful instructions from the controller. The processor is not entitled for decision-making with regard to the processing of the data. Taxi drivers providing passenger taxi services are also considered as data processors. With regard to the number of taxi service providers providing passenger transport services, as our franchisees are not listed in section 5 of this document, the list of taxi service providers providing passenger transport services is set out in Annex 1 to this document. Főtaxi undertakes to review the list of data processors not included in this Policy on a monthly basis and to update and modify it if necessary. The turnover of the data processors does not allow for the publication of the current list on the website of Főtaxi, Annex 1 can be consulted at the head office of Főtaxi or upon written request will be sent to the requesting party.

Our Company will provide further, more detailed information on data processors to data subjects on the basis of their written request to the contact details provided in points 1.1 and 1.2.

Processors shall process the data taking into account the retention periods set out in point 4.

## **EACH DATA PROCESSOR:**

### **5.1.1. Accounting tasks, invoicing**

- Activity performed by the data processor: accounting, financial and tax tasks, invoicing, management of receivables arising from service contracts.
- Name and contact details of the data processor:  
Name: STELIUS Befektető Zártkörűen Működő Részvénytársaság  
Address: 1027 Budapest, Csalogány utca 23.
- Scope of the data processed: names, billing names, billing addresses of the persons having a contractual relationship with Főtaxi Zrt.; personal data that may be added in addition to the above in the performance confirmations.
- Data subjects: contracted parties with Főtaxi Zrt.
- Purpose of data processing: to carry out accounting tasks, to comply with legal obligations under tax legislation.

### **5.1.2. Software development and management services**

- Activity performed by the data processor: operation and development of the address validation software certified by Budapesti Közlekedési Központ, Taxi Driver and

„RobotDispatcher”.

- Name and contact details of the data processor:  
Name: NERD DEVELOPMENTS Zártkörűen Működő Részvénytársaság  
Address: 1113 Budapest, Ábel Jenő utca 23. 2. em. 2.
- Scope of the data processed: the personal data displayed in the Taxi Driver application and the name of the person placing the order, his/her telephone number and the ordering address for the operation of “RobotDispatcher”.
- Data subjects: the Customer, the users of the passenger transport service.
- Purpose of data processing: to carry out the developments necessary for the operation of Taxi Drive software, to provide background hosting to ensure proper operation, and to operate and develop „RobotDispatcher”.

#### **5.1.3. Transfer of carriage**

- Activity performed by the data processor: performance of passenger transport service or contractual obligations
- Name and contact details of the data processor:  
Name: MB ELIT LUXURY Kft., taxi service providers using the "Budapest Taxi" brand  
Address: 1087 Budapest, Kerepesi út 15.
- Scope of the data processed: personal data defined in point 4 of this Policy.
- Data subjects: the Customer, the users of the passenger transport service.
- Purpose of processing: to perform the tasks specified in the service contract.

#### **5.1.4. Marketing services, Social media platform management**

- Activity performed by the data processor the performance of the Company's marketing activities and management of the Facebook page (hereinafter: FB) and Instagram page of Főtaxi, as well as YouTube channels.
- Name and contact details of the data processor:  
Name: STELIUS Befektető Zártkörűen Működő Részvénytársaság  
Address: 1027 Budapest, Csalogány u. 23.
- Scope of the data processed: all personal data that can be known and processed by the Processor in the course of the processing of the Community Platforms of data closely related to the performance of the activity or the provision of the service specified in the Contract, which cannot be precisely defined in advance. The personal data may include, but are not limited to: identification and contact data (name, address, telephone, e-mail address, etc.); personal characteristics of the users of the Főtaxi Community Platforms (data provided in the data form, e.g. age, gender, marital status, etc.)
- The data subjects: all natural persons, including self-employed persons, who cannot be specified in advance, concerned by the processing of data closely related to the performance of an activity or the provision of a service in the management of the



Community Platforms. In particular, but not exclusively, the data subjects may be: persons following the social platforms of the Data Controller; customers and potential customers of the Data Controller.

- Purpose of processing: to inform the Data Controller's customers and potential customers.

#### **5.1.5. Marketing services, Social media platform management**

- Activity performed by the data processor: management of the Facebook page (hereinafter: FB) and Instagram page of Főtaxi, as well as YouTube channels.
- Name and contact details of the data processor:  
Name: Positive by Hinora Group Kft.  
Address: 1062 Budapest, Délibáb utca 29.
- The scope of the data processed: all personal data that can be known and processed by the Processor in the course of data processing closely related to the performance of the activity or the provision of the service specified in the Contract, which cannot be precisely determined in advance. The personal data may include, but are not limited to: identification and contact data (name, address, telephone, e-mail address, etc.); personal characteristics of the users of the social platforms of Főtaxi (data provided in the data form, e.g. age, gender, marital status, etc.)
- Data subjects: all natural persons, including self-employed persons, who cannot be precisely identified in advance, concerned by the processing of data closely related to the performance of the activity or the provision of the service specified in the Contract. In particular, but not exclusively, the data subjects may be: Persons following the social platforms of the Data Controller, customers and potential customers.
- Purpose of processing: to inform the Data Controller's customers and potential customers.

In certain cases, the Company may transfer personal data of data subjects to countries outside the European Union (e.g. the United States), the Company undertakes not to transfer personal data to third parties for their own business purposes (e.g., data mining or direct marketing companies). For data transfers to the United States and other countries, we rely on the European Commission's country-specific compliance decisions.

The Company may be obliged by law or by request from public authorities to disclose certain data to the competent authorities (such as the police). In the event of a data breach, i.e. where the data we process is accidentally or unlawfully destroyed, lost, altered, disclosed to a third party without authorisation or accessed by a third party without authorisation, it may be necessary to transfer certain data to the data protection authority. The Company will disclose to public authorities, where the authority has indicated the precise purpose and scope of the data, only such personal data as is strictly necessary for the purpose of the request and to the extent that such disclosure is necessary to achieve the purpose of the request.

## **6. RIGHTS OF THE DATA SUBJECT**

### **6.1. Right to withdraw consent**

The data subject has the right to withdraw his or her consent to the processing at any time. However, this does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal.

## **6.2. Right to information (access)**

The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access to the personal data and information, including profiling based on the above provisions.

## **6.3. Right to rectification**

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

## **6.4. Right to erasure ('right to be forgotten')**

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay, when

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

The erasure of data may not be initiated if the processing is necessary: for the exercise of the right to freedom of expression and information; for compliance with an obligation under Union or Member State law to process personal data or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller; for public health purposes or for archiving, scientific or historical research purposes or statistical purposes, in the public interest; or for the establishment, exercise or defence of legal claims.

## **6.5. Right to restriction of processing**

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal

- claims;
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

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.

#### **6.6. Right to data portability**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

#### **6.7. Right to object**

In the case of processing based on legitimate interest or public authority as legal grounds, the data subjects have the right to object at any time to the processing of their personal data on grounds relating to your particular situation, including profiling based on the provisions mentioned above. The data subjects have the right to object at any time, on grounds relating to their particular situation, to processing of their personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, or necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, including profiling based on those provisions.

In the event of an objection, the Data Controller may no longer process the personal data, unless it is necessary to override legitimate grounds which override the interests, rights and freedoms of the Data Subject, or for the establishment, exercise or defence of legal claims.

The data subject can initiate requests for access to personal data and the exercise of the data subject's rights described above in the following ways:

- by post, addressed to Fótaxi Zrt., 1087 Budapest, Kerepesi út 15.,
- by e-mail to titkarsag.fotaxi@fotaxi.hu
- by telephone at +36 1 422 2104.

#### **7. TIME LIMIT FOR ACTION**

The controller shall inform the data subject of the action taken on such requests without undue delay and in any event within 1 month of receipt of the request.

If necessary, this may be extended by 2 months. The controller shall inform the data subject of the extension of the time limit, stating the reasons for the delay, within 1 month of receipt of the request.

If the controller fails to act on your request, it shall inform you without delay, but no later than one month from the date of receipt of the request, of the reasons for the failure to act and of the possibility to lodge a complaint to the Hungarian National Authority for Data Protection and Freedom of Information and, in the event of unlawful processing, to bring the matter before the competent court of your place of residence or domicile.

#### **8. SECURITY OF DATA PROCESSING**

Data security protects personal data under processing against risks, in particular risks resulting

from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

The controller and the processor shall implement appropriate technical and organisational measures, taking into account the state and the cost of implementation, the nature, scope, context and purposes of the processing and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons, in order to ensure a level of data security appropriate to the level of risk, including, where appropriate:

- 8.1.1.** the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;
- 8.1.2.** in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;
- 8.1.3.** a procedure for the regular testing, evaluation and assessment of the effectiveness of the technical and organisational measures taken to ensure the security of data processing.
- 8.1.4.** The processed data must be stored in such a way that they cannot be accessed by unauthorised persons. In the case of paper-based data carriers, by establishing physical storage and filing arrangements, and in the case of data in electronic form, by using a centralised access management system.
- 8.1.5.** The method of storing the data by computerised means must be chosen in such a way that it can be deleted, also taking into account any different deletion deadline, at the expiry of the deletion deadline or if otherwise necessary. Erasure shall be irreversible.

The controller shall take the following specific data security measures:

- 8.1.5.1.** In order to ensure the security of personal data processed on paper, the controller applies the following measures (physical protection):
  - 8.1.5.1.1.** Store documents in a secure, lockable, dry room.
  - 8.1.5.1.2.** The building and premises of the controller are equipped with fire and property protection equipment.
  - 8.1.5.1.3.** Personal data can only be accessed by authorised persons and cannot be accessed by third parties.
  - 8.1.5.1.4.** The data controller's staff member carrying out data processing may leave the premises where data processing is taking place only by locking the data media entrusted to him/her or by locking the premises.
  - 8.1.5.1.5.** Where personal data processed on paper are digitised, the rules applicable to digitally stored documents shall apply.

## **9. INFORMING THE DATA SUBJECT OF THE PERSONAL DATA BREACH**

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

The information given to the data subject shall **clearly and prominently** describe the nature of the personal data breach and provide the name and contact details of the data protection officer or other contact person who can provide further information; describe the likely

consequences of the personal data breach; describe the measures taken or envisaged by the controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

The data subject need not be informed if any of the following conditions are met:

- the controller has implemented **appropriate technical and organisational protection measures** and these measures have been applied in relation to the data affected by the personal data breach, in particular measures such as the use of encryption, which **render the data unintelligible to persons not authorised** to access the personal data;
- the controller has taken additional measures following the personal data breach **to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialise**;
- information would require a **disproportionate effort**. In such cases, the data subjects shall be informed by means of publicly disclosed information or by a similar measure which ensures that the data subjects are informed in an equally effective manner.

If the controller has not yet notified the data subject of the personal data breach, the supervisory authority may order the data subject to be informed after having considered whether the personal data breach is likely to present a high risk.

#### **9.1. REPORTING A PERSONAL DATA BREACH TO THE AUTHORITY**

The personal data breach shall be notified by the controller to the competent supervisory authority without undue delay and, if possible, no later than 72 hours after personal data breach has come to its attention, unless the personal data breach is unlikely to pose a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it shall be accompanied by the reasons justifying the delay.

#### **9.2. HANDLE OF COMPLAINT**

A complaint against a possible infringement by the data controller can be lodged to the Hungarian National Authority for Data Protection and Freedom of Information:

**Nemzeti Adatvédelmi és Információszabadság Hatóság / Hungarian National Authority for Data Protection and Freedom of Information**

1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf. 9.

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

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

*The main legislation taken into account in the preparation of this Policy:*

*- Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 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 Informational Self-Determination and Freedom of Information (Privacy Act);*

- Act CVIII of 2001 on Electronic Commerce and on Information Society Services

- Government Decree No 176/2015 (VII. 7.) on the carriage of passengers by road for remuneration;

- Budapest Municipal Decree no 31/2013. (IV. 18.) Főv. Kgy. (**Taxi Decree**) on the conditions of operation of the passenger taxi service and of the service of intermediary and organiser of passenger taxi services, on the rules for the establishment and use of taxi ranks and on the official price of the passenger taxi service;

Act C of 2000 on Accounting (Accounting Act)

The Company has also taken into account the recommendation of the Hungarian National Authority for Data Protection and Freedom of Information on the data protection requirements for prior information.

Fótaxi Zrt. reserves the right to unilaterally amend this Privacy Policy at any time.

Annex 1: List of data processors

**Budapest, 29<sup>th</sup> July 2021**

**Fótaxi Zrt.**