

ELECTRONIC MONITORING SYSTEM RULES

In force: 2024.12.09.

1. Introductory provisions

- 1.1. Parkl **Digital Technologies Ltd.** (hereinafter referred to as: '**Data Controller**'), in order to be able to operate the Instant Parking function of the Parkl system, uses and operates an electronic monitoring system (hereinafter: "**Electronic monitoring system**"). Parkl shall draw up the present rules, including the balancing of interests test, with regard to the use and operation of an electronic monitoring system.
- 1.2. All capitalized words and concepts in this Electronic Monitoring System Policy refer to the General Terms and Conditions for the Parkl System. The Terms and Conditions (hereinafter: '**GTC**') and the Corporate Contractual Terms (hereinafter: '**CCT**') and have the same meaning as defined in its Privacy Policy.
- 1.3. The rules governing the operation of the camera system were established on the basis of the legal environment detailed in point 10. We reserve the right to unilaterally modify this policy at any time by informing Partners and Users in advance.
- 1.4. It is the obligation of the Data Controller to place a warning sign about the use of an electronic monitoring system in the given area.
- 1.5. Upon request, the Data Processor shall provide information about the personal data processed by the Data Processor, commissioned by the Data Processor or at its disposal, their source, the purpose, legal basis and duration of the data processing, as well as the legal basis and recipient of the data transfer.

2. Scope of data processed

- 2.1. For the purpose of identifying the license plate number of Users using the instant parking service, the license plate number of all passenger cars entering the area monitored by the camera. The camera captures only the license plate number at some locations, while at other locations the vehicle as a whole, by principle, natural persons cannot be identified in the recordings. Furthermore, the camera surveillance system does not record any sound.

3. Cameras recording license plates

- 3.1. The cameras operated by the Data Controller operate at the locations, with the purpose and angle of view set out in the following table: The purpose of placing all cameras in the list below is to read and identify the license plate number of the passenger car in order to make the instant parking function available

	Parking place name	Parking place address	Direction
1	Hungária krt. 189	1146 Budapest Hungária krt. 189.	Entrance
2	Hungária krt. 189	1146 Budapest Hungária krt. 189.	Exit
3	Europeum	1085 Budapest Somogyi Béla u. 4.	Entrance
4	Europeum	1085 Budapest Somogyi Béla u. 4.	Exit
5	Futó u. 52. parkolóház	1082 Budapest Futó utca 52.	Entrance
6	Futó u. 52. parkolóház	1082 Budapest Futó u. 52	Exit
7	Hillside Offices	1123 Budapest Alkotás utca 55-61	Entrance
8	Hillside Offices	1123 Budapest Alkotás utca 55-61	Exit
9	Duna Pláza	1138 Budapest Váci út 178.	Entrance
10	Duna Pláza	1138 Budapest Váci út 178.	Entrance
11	myHive Haller Gardens	1095 Budapest Soroksári út 32-34.	Entrance
12	myHive Haller Gardens	1095 Budapest Soroksári út 32-34.	Exit
13	myHive Haller Gardens	1095 Budapest Soroksári út 32-34.	Entrance
14	myHive Haller Gardens	1095 Budapest Soroksári út 32-34.	Exit
15	Mozium Irodaház	1026 Budapest Pasaréti út 122-124.	Entrance
16	Mozium Irodaház	1026 Budapest Pasaréti út 122-124.	Exit
17	Spirál Parkolóház	1134 Budapest Szabolcs utca 32.	Entrance

18	Spirál Parkolóház	1134 Budapest Szabolcs utca 32.	Exit
19	Belváros Parkolóház - Székesfehérvár	8000 Székesfehérvár Távirida utca 1-3.	Entrance
20	Belváros Parkolóház - Székesfehérvár	8000 Székesfehérvár Távirida utca 1-3.	Entrance
21	Bécsi Corner Offices	1025 Budapest Szépvölgyi út 6	Entrance
22	Bécsi Corner Offices	1025 Budapest Szépvölgyi út 6	Exit
23	Múzeum Mélygarázs	1146 Budapest 56-osok tere	Entrance
24	Múzeum Mélygarázs	1146 Budapest 56-osok tere	Entrance
25	Múzeum Mélygarázs	1146 Budapest 56-osok tere	Entrance
26	Eiffel Square	1062 Budapest Teréz körút 55.	Entrance
27	Eiffel Square	1062 Budapest Teréz körút 55.	Exit
28	KöKI Terminál	1191 Budapest Vak Bottyán u. 75. a-c	Entrance
29	KöKI Terminál	1191 Budapest Vak Bottyán u. 75. a-c	Entrance
30	KöKI Terminál	1191 Budapest Vak Bottyán u. 75. a-c	Entrance
31	Erste	1138 Budapest Népfürdő utca 24-26.	Entrance
32	Erste	1138 Budapest Népfürdő utca 24-26.	Exit
33	Bank Center Office	1051 Budapest Sas utca 27	Entrance
34	Bank Center Office	1051 Budapest Sas utca 27	Exit
35	NN Office	1139 Budapest Fiastyúk utca 4-8.	Entrance
36	NN Office	1139 Budapest Fiastyúk utca 4-8.	Exit
37	Újpest-Városkapu P+R	1138 Budapest Árva u. 1	Entrance
38	CIB Petrezselyem	1024 Budapest Petrezselyem utca 2-8	Entrance
39	CIB Petrezselyem	1024 Budapest Petrezselyem utca 2-8	Exit
40	Kőbánya-Kispest P+R	1103 Budapest Regina köz, Kőbánya-Kispest Metróvégállomás	Entrance
41	Kőbánya-Kispest P+R	1103 Budapest Regina köz, Kőbánya-Kispest Metróvégállomás	Entrance
42	KÖKI Terminál P+R	1191 Budapest Vak Bottyán út 75/A-C	Entrance
43	Pillangó utca P+R A	1148 Budapest Kerepesi út 58.	Entrance
44	Őrs vezér tere P+R	1106 Budapest Fehér út 1.	Entrance
45	Őrs vezér tere P+R	1106 Budapest Fehér út 1.	Entrance
46	Hűvösvölgy P1 P+R	1029 Budapest Báthori László u. 1.	Entrance
47	Pillangó utca P+R B	1148 Budapest Kerepesi út 58.	Entrance
48	Hévíz - Víztorony parkoló	8380 Hévíz Széchenyi út 35.	Entrance
49	Hévíz - Nagyparkoló	8380 Hévíz Széchenyi út 5.	Entrance
50	Hévíz - Nagyparkoló	8380 Hévíz Széchenyi út 5.	Entrance
51	Allure Residence	1097 Budapest Vágóhid utca 3	Entry/Exit
52	myHive Átrium Park P2	1134 Budapest Váci út 45	Entrance
53	myHive Átrium Park P2	1134 Budapest Váci út 45	Exit
54	Budapest ONE Parkolóház	1112 Budapest Balatoni út	Exit
55	Budapest ONE Parkolóház	1112 Budapest Balatoni út	Exit
56	Budapest ONE Parkolóház	1112 Budapest Balatoni út	Entrance
57	Budapest ONE Parkolóház	1112 Budapest Balatoni út	Entrance

58	Budapest ONE Parkolóház	1112 Budapest Balatoni út	Entrance
59	Reno Udvar	1138 Budapest Váci út 168	Exit
60	Reno Udvar	1138 Budapest Váci út 168	Entrance
61	Millennium Gardens	1095 Budapest Lechner Ödön fasor 10/B	Entrance
62	Millennium Gardens	1095 Budapest Lechner Ödön fasor 10/B	Exit
63	Millennium Gardens	1095 Budapest Lechner Ödön fasor 10/B	Entrance
64	Millennium Gardens	1095 Budapest Lechner Ödön fasor 10/B	Exit
65	Promenade Gardens	1133 Budapest Váci út 80-84	Entrance
66	Promenade Gardens	1133 Budapest Váci út 80-84	Exit
67	Promenade Gardens	1133 Budapest Váci út 80-84	Entrance
68	Promenade Gardens	1133 Budapest Váci út 80-84	Exit
69	UNIQA	1134 Budapest Róbert Károly krt. 70-74	Entrance
70	UNIQA	1134 Budapest Róbert Károly krt. 70-74	Exit
71	Mill Park A	1095 Budapest Soroksári út 44	Entrance
72	Mill Park A	1095 Budapest Soroksári út 44	Exit
73	Corvin Innovation Campus	1083 Budapest Szigony utca 26-32.	Entrance
74	Corvin Innovation Campus	1083 Budapest Szigony utca 26-32.	Exit
75	Corvin Innovation Campus	1083 Budapest Szigony utca 26-32.	Exit
76	Advance Tower 1 - V43	1134 Budapest Váci út 43	Entrance
77	Advance Tower 1 - V43	1134 Budapest Váci út 43	Exit
78	Advance Tower 2 - V41	1134 Budapest Váci út 41	Entrance
79	Advance Tower 2 - V41	1134 Budapest Váci út 41	Exit
80	SE EOK Tűzoltó utca	1094 Budapest Tűzoltó utca 37-47	Entrance
81	SE EOK Tűzoltó utca	1094 Budapest Tűzoltó utca 37-47	Exit
82	Mill Park B	1097 Budapest Tóth Kálmán utca 2/B	Entrance
83	Mill Park B	1097 Budapest Tóth Kálmán utca 2/B	Exit
84	Nordic Light A	1133 Budapest Váci út 96-98	Entrance
85	Nordic Light A	1133 Budapest Váci út 96-98	Exit
86	Krisztina Palace	1123 Budapest Nagyenyed utca 8-14	Entrance
87	Krisztina Palace	1123 Budapest Nagyenyed utca 8-14	Exit
88	SE BKT	1084 Budapest Baross utca 31	Entrance
89	SE BKT	1084 Budapest Baross utca 31	Exit
90	SE BKT	1084 Budapest Baross utca 31	Entrance
91	SE BKT	1084 Budapest Baross utca 31	Exit
92	SE KKT	1084 Budapest Korányi Sándor utca	Entrance
93	SE KKT	1084 Budapest Szigony utca	Exit
94	Örmező P1 P+R	1112 Budapest Zelk Zoltán út 4.	Entrance
95	Örmező P1 P+R	1112 Budapest Zelk Zoltán út 4.	Entrance
96	Örmező P2 P+R	1112 Budapest Zelk Zoltán út 3.	Entrance
97	Örmező P2 P+R	1112 Budapest Zelk Zoltán út 3.	Entrance
98	Örmező P2 P+R	1112 Budapest Zelk Zoltán út 3.	Entrance

99	Etele P1 P+R	1119 Budapest Gyergyótölgyes út 1	Entrance
100	Etele P1 P+R	1119 Budapest Gyergyótölgyes út 1	Entrance
101	Etele P2 P+R	1119 Budapest Somogyi út 3.	Entrance
102	Átrium Irodaház P1	1134 Budapest Váci út	Entrance
103	Átrium Irodaház P1	1134 Budapest Váci út	Exit
104	Átrium Irodaház P1	1134 Budapest Váci út	Entrance
105	Átrium Irodaház P1	1134 Budapest Váci út 45	Exit
106	Esztergomi úti Parkoló	1138 Budapest Esztergomi út 60	Entrance
107	Esztergomi úti Parkoló	1138 Budapest Esztergomi út 60	Exit
108	Liberty Irodaház	1097 Budapest Könyves Kálmán krt.	Entrance
109	Liberty Irodaház	1097 Budapest Könyves Kálmán krt.	Entrance
110	Liberty Irodaház	1097 Budapest Könyves Kálmán krt.	Exit
111	Liberty Irodaház	1097 Budapest Könyves Kálmán krt.	Exit
112	Liberty Irodaház	1097 Budapest Könyves Kálmán krt.	the Interior Entrance
113	Liberty Irodaház	1097 Budapest Könyves Kálmán krt.	the Inner Exit
114	BEM Center Irodaház	1027 Budapest Bem József u. 3	Entrance
115	BEM Center Irodaház	1027 Budapest Bem József u. 3	Exit
116	BSQ Irodaház	1036 Budapest Lajos utca 48.	Entrance
117	BSQ Irodaház	1036 Budapest Lajos utca 48.	Exit
118	Margit Palace	1027 Budapest Henger u. 2	Entrance
119	Margit Palace	1027 Budapest Henger u. 2	Exit
120	Wizz Air	1095 Budapest Lechner Ödön fasor 6	Entrance
121	Wizz Air	1095 Budapest Lechner Ödön fasor 6	Exit
122	Arena Corner Office	1087 Budapest Hungária Körút 40-47	Entrance
123	Arena Corner Office	1087 Budapest Hungária Körút 40-47	Exit
124	Arena Corner Office	1087 Budapest Hungária Körút 40-47	Entrance
125	Arena Corner Office	1087 Budapest Hungária Körút 40-47	Exit
126	Rozsnyay mélygarázs	1139 Budapest Váci út 99.	Entrance
127	Rozsnyay mélygarázs	1139 Budapest Váci út 99.	Exit
128	Lomb utcai mélygarázs	1139 Budapest Váci út 99.	Entrance
129	Lomb utcai mélygarázs	1139 Budapest Váci út 99.	Exit
130	Rozsnyay felszíni parkoló	1139 Budapest Váci út 99.	Entrance
131	Rozsnyay felszíni parkoló	1139 Budapest Váci út 99.	Exit
132	Bem Kimpton Hotel	1027 Budapest Bem József tér	Entrance
133	Bem Kimpton Hotel	1027 Budapest Bem József tér	Exit
134	City Center Office	1051 Budapest Bajcsy-Zsilinszky út 12.	Entrance
135	City Center Office	1051 Budapest Bajcsy-Zsilinszky út 12.	Exit
136	Pódium Irodaház	1065 Budapest Nagymező utca 44.	Entrance
137	Pódium Irodaház	1065 Budapest Nagymező utca 44.	Exit
138	Liget Center	1065 Budapest Dózsa György út 84	Entry/Exit

3.2. In addition to the above, the operator of the cameras operating for the purpose of the Instant Parking function is not the Data Controller, in these cases the Partner can be considered the operator, the performance of data protection compliance is the responsibility of the Partner in cases other than those listed. The Controller may be considered to be a data processor in the case of electronic monitoring systems operated by the Partner for the purpose of Instant Parking. However, the storage of the license plates recorded by the cameras is always carried out exclusively by the Data Controller, so in the following, we also mean the data processing activity of license plates made by cameras operated by Partners by Data Controller's data processing.

4. Purpose of recording management

4.1. The purpose of the processing of the recordings, i.e. the license plates, is to provide the Concerned Persons using the Parkl application with a convenience function through the Instant Parking Service, in order to use which it is necessary to process the camera images of the license plates and, in some cases, the image of the Passenger Vehicle as a whole. The further purpose of data processing is to enable the Controller to continuously improve the Service by handling camera images with the help of artificial intelligence operating within the system, in order to enable the camera to read the license plates with greater accuracy, and to identify the Passenger Vehicle using the Instant Parking Service by identifying the shape of the Passenger Vehicle, even if the license plate may not be readable. The processing of the data is also aimed at the effective conduct of any complaint-handling procedures, so that the recordings can be reviewed if necessary.

5. Legal basis for the processing of recordings

- 5.1. The legal basis for data processing is the legitimate interest of the Data Controller or a third party [Article 6(1)(f) of the GDPR].
- 5.2. Consent to data processing may be given in the form of Indicative behaviour and, in the case of registered Users, by accepting the Privacy Policy. Indicative behaviour, especially if the Data Subject enters the building affected by the camera system.
- 5.3. Furthermore, in the course of conducting a possible complaint-handling procedure, it is a legal basis under Act CLV of 1997 on consumer protection that businesses are obliged to investigate complaints received by them on the merits.
- 5.4. The legitimate interest is sufficiently specific. It is specifically in order to enable the Instant Parking Service, in the case of cameras subject to camera surveillance and operated by Parkl, the Data Controller shall place the cameras in its Parking Spaces and operate them solely for the purpose of license plate reading and the development of the Service, and the data processing activity subject to the balancing of interests shall be carried out for the lawfulness of the complaint handling. It is necessary to carry out the data processing activity subject to the balancing of interests.
- 5.5. The legitimate interest is real and contemporary. The Instant Parking function is part of the Parkl application; therefore the license plate number identification and the continuous development of the Service is indispensable for making the Service available, which is based on constant, continuous or usually occurring needs. In addition, the Data Controller has a legitimate interest in handling consumer complaints received by the Data Controller or the Partner, a genuine interest to be protected, as defined by law, and a fundamental economic and business interest in investigating complaints related to the Service.

6. Duration of recordings storage

6.1. The Data Controller shall process the data concerned until the purpose of data processing has ceased to exist or it deletes them if the further processing of the data is no longer necessary for the achievement of the purpose of data processing. As a general rule, the Data Controller stores the camera images of the license plates for 30 days.

7. Necessity and proportionality of the processing

- 7.1. The processing is strictly necessary for the pursuit of a legitimate interest. Data processing related to license plates recorded by the electronic monitoring system is necessary in order to make the Instant Parking Service available to Users through the concrete provision of the Service and its continuous improvement. The camera can be used to identify the number plates and is also the most appropriate device based on the current state of the art. In case of complaint handling, the storage of the license plate numbers recorded by the electronic monitoring system is also necessary, since in case of complaints it can be established whether the given passenger car was actually present at the given Parking Space.
- 7.2. When establishing the necessity criterion, the Controller examines whether alternative, less restrictive means are available to achieve the purpose. However, based on the results of the investigation, there is currently no technique or solution that can be used to identify the license plate number of a passenger car in addition to making the Instant Parking service available without taking pictures. The achievement of the objective cannot

be ensured by any other method that restricts the data subject's right to informational self-determination to a lesser extent. Based on the above, the Data Controller concludes that the interest of data processing is necessary.

- 7.3. In the course of the examination of proportionality, the Controller has established that the processing is proportionate in view of the fact that it does not cause more data processing than is strictly necessary to achieve the purpose. The nature of the personal data processed is limited to the license plate number only, and there is no fundamental interest in protecting the right to an image, as no such processing takes place.
- 7.4. When examining the positive and negative effects of data processing for the data subject, it can be established that data processing may also have an explicit advantage for the data subject, since the Instant Parking function allows the use of a convenient, contactless parking service, and in the event of a complaint, it can help to resolve it quickly and efficiently. The data processing may have a negative impact on the data subject, since due to the fact that the data processing is not carried out on the basis of consent, it may happen against the will of the data subject. However, it should be noted that processing for as short a period as possible and limited access to data are effective in mitigating these negative effects.
- 7.5. In addition, the Service Provider restricts the availability and acquaintance of the personal data concerned. Knowing them is strictly possible for those employees who need personal data for the performance of their work.

8. Interest balancing test

8.1. The balancing test is a documented balancing exercise carried out with regard to Article 6 (1) (f) of the GDPR, during which the legitimate interest of the Company is identified in addition to its comparison with the legitimate interest of the Data Subjects.

8.2. As a result of the interest balancing test, there will be a legal basis for data processing by means of the camera surveillance system if the related interest of the Data Controller is more important than the Data Subject's right to the protection of their personal data.

8.3. Steps of the balancing test for each camera:

8.3.1. Analyse whether the installation of a camera with data processing is absolutely necessary in a given location or whether an alternative exists; This way, data management can be avoided.

The purpose of data management is to make available the Instant Parking function, which requires technical measures that are suitable for recognizing the license plate number of the given passenger car, so it is not only suitable, but also indispensable to achieve the interest of the Data Controller. However, no other alternative, less restrictive means are available to the Data Controller to achieve its legitimate interest. Apart from the license plate number, no other personal data can be seen on the recordings; depending on the type of camera, in some cases the car as a whole and its shape can also be seen, which helps identification; however, in principle, natural persons and additional personal data cannot be recognized on these recordings, and should the natural persons on the recordings nevertheless become recognizable, their images will be stored encrypted by the Data Controller. The processing is limited to the processing of strictly necessary data. Without storing the recordings for a certain period of time, it could not serve to maintain and develop the Instant parking service, to prove and verify what happened in case of complaint handling. On the basis of the above, there is a need for a legitimate interest.

8.3.2. Determination of the legitimate interest that requires processing.

The Instant Parking service implemented at the Parking places of the Data Controller is an interest that can be considered not only as an interest of the Data Controller, since the contactless, modern parking solution is also a modern social interest, and it is not feasible to continuously update and improve the Service in the light of practical experience without maintaining and continuously developing the Service.

The legitimate interest of the Data Controller in the lawful handling of complaints is a legally recognised interest protecting the interests of the Data Subject and

The fundamental interest in the possibility for the Data Controller to provide evidence. In this way, it can be concluded that the processing is based on a legitimate interest that is sufficiently defined, genuine and contemporary.

8.3.3. Determining the purpose of data processing and the duration of the processing of the image recording by the Data Controller.

The Data Controller shall process the data concerned until the purpose of data processing has ceased to exist. If further processing of the data is no longer necessary for the fulfilment of the purpose of data processing, the Data Controller shall delete them. As a general rule, the Data Controller stores the camera images of the license plates for 30 days. At the Data Controller's discretion, this period is necessary in order to carry out error corrections, improvements and analyses in order to maintain and improve the service, as well as to assess and respond to any complaints received. On the basis of the above, the existence of a legitimate interest in relation to the duration of data processing can be established.

8.3.4. What legitimate interests and rights of the data subjects can be identified against data processing.

Consideration should be given to the possible negative impact of data processing on the data subject, which may shift the standard of data processing towards prohibition. In view of the positive effects of data processing on data subjects analysed so far and the fact that, thanks to the method of data

processing, the effects of data processing can be fully predicted, the proportionality test does not move in this respect either towards the admissibility of data processing or towards its prohibition. However, the proportionality of the restriction is increased by the fact that the Controller provides the Data Subject with complete, clear and plain information about the scope of the personal data processed, the basis, method and time of data processing, the data subject's rights related to data processing, and that these data are stored for the shortest possible period of time and can only be accessed by those persons who need it for the performance of their work.

8.3.5. Determining why the legitimate interest of the data subject is proportionately limited by the Controller's legitimate interest.

Based on the analysis of the data controller, it can be concluded that although the data processing restricts the data subject's right to self-determination with regards to their personal data, this right does not constitute an absolute, unrestricted right, so it is permissible in case of necessity and proportionality of the data processing. In view of the fact that, on the basis of the above, there is a need, it is necessary to proceed with a proportionality test. In assessing proportionality, although there is a weaker interest than the enforcement of the fundamental right, making the Instant Parking function available as a convenience service is considered to be a stronger interest than other legitimate interests and culturally or socially recognised interests. The interest of the Data Controller to have the possibility to provide evidence in case of a consumer complaint can also be interpreted as a public interest, since in this context the legitimate interest of the Data Controller coincides with the interest of consumers in the lawful handling of complaints. In this case too, although this interest is weaker than the enforcement of the fundamental right when assessing proportionality, it can be considered to outweigh other legitimate interests and culturally or socially recognised interests. In addition, it can be stated that the processed data may be necessary in the future, since with technical developments there is an increasing demand for the widespread introduction of modern technical solutions, which is why the standard is tilted towards the permissibility of data processing.

On the basis of the results of the balancing test, it can be established that the Data Subject's right does not override the legitimate interest of the Controller, and the processing constitutes a necessary and proportionate restriction in relation to the Data Subject.

9. Data subjects' rights in relation to data processing

9.1. Processing of User-Related Data

9.1.1. The Data Subject shall have the right of access to the data collected concerning them and the right to exercise this right easily and at reasonable intervals in order to establish and verify the lawfulness of the processing.

9.1.2. The Data Controller shall take appropriate measures to ensure that the Data Subject has access to the personal data concerning them, provide all information, each information in a concise, transparent, intelligible and easily accessible form, using clear and plain language. Upon request, the information is provided primarily electronically at the e-mail address info@parkl.net or verbally at the phone number +36-1/8555-777, and may also be requested in person at the registered office of the Data Controller. In order to provide information, it is always necessary to verify the identity of the Data Subject.

9.1.3. The Data Controller shall inform the Data Subject of the action taken on their request without undue delay and in any event within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

9.1.4. If the Data Controller does not take action on the Data Subject's request, the Data Controller shall inform the Data Subject without delay, but at the latest within one month of receipt of the request, of the reasons for the failure to take action and of the possibility for the Data Subject to lodge a complaint with a supervisory authority and to exercise their right to judicial remedy.

9.1.5. The Data Subject shall have this right provided by the Data Controller free of charge, however, if the request is unfounded or excessive, for example due to repeated requests, taking into account the administrative costs of providing the requested information or brief or taking the requested action, the Data Controller may refuse the action or charge a fee.

9.1.6. If the Data Controller processes a large amount of information about the Data Subject, the Data Controller may request the Data Subject to specify, prior to the communication of the information, which information or which processing activities are subject to their request.

9.2. Access

9.2.1. The Data Controller shall take all reasonable measures to establish the identity of the data subject requesting access, in particular:

in the context of online services and online identifiers. The Data Controller shall not retain personal data solely for the purpose of responding to possible requests.

9.3. Correction and deletion of data

9.3.1. The Data Subject shall have the right to request the rectification of personal data concerning them and shall have the 'right to be forgotten' if the retention of such data infringes the provisions of a law.

9.3.2. The data subject shall have the right to obtain from the controller the erasure of personal data concerning them and the controller shall no longer process the personal data in the event of the objection, unless we can demonstrate 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.

9.4. Right to restriction

9.4.1. Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

The data is incorrect, the processing is unlawful or the controller no longer needs the personal data for the purposes of the processing.

9.4.2. However, the continued retention of such personal data may be considered lawful if the expression of opinion and the provision of information necessary to protect the exercise of the right to freedom of movement, compliance with a legal obligation or the performance of a task carried out in the public interest, etc.

9.5. Right to object

9.5.1. The data subject shall have the right to object to the processing of personal data concerning them where one of the following applies: the processing is 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 for the purposes of the legitimate interests pursued by the controller or by a third party;

9.6. Right to data portability

9.6.1. The data subject shall have the right to object to the processing of personal data concerning them where one of the following applies: the processing is 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 for the purposes of the legitimate interests pursued by the controller or by a third party;

10. Related legislation:

- European Union legislation: General Data Protection Regulation (EU) 2016/679 of the European Union ("GDPR")
- Article VI of the Fundamental Law of Hungary
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information
- Act V of 2013 on the Civil Code (Civil Code)
- Proposal for a Directive of the European Parliament and of the Council on certain aspects of electronic commerce services and information society services
Act CVIII of 2001 (Elkertv.)
- Act CLV of 1997 on consumer protection (Consumer Protection Act)
- Act C of 2003 on electronic communications (Eht.)