

PRIVACY POLICY

In force: 2024.12.09.

Please read the present privacy policy carefully before using the Parkl system. All information relating to the processing of data in Parkl is set out in these Data Protection Rules concerning the collection, use, storage, publication and deletion of data, with particular regard to personal data, in accordance with Regulation 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter: GDPR) and Act CXII of 2011 on Informational Self-Determination and Freedom of Information “Infotv.”).

1. Preamble

- 1.1. Parkl Digital Technologies Kft. (hereinafter ‘**Controller**’) is a company incorporated and operating in Hungary whose main business is the provision of IT services. The data controller is the same provider as defined in the General and Corporate Contractual terms respectively. The Data Controller uses the software and its mobile phone application developed by them (hereinafter referred to as **Parkl**) and associated infrastructure surfaces and devices (hereinafter: ‘**The Parkl System**’) to provide the parking service of its partners, enabling them to access free parking areas through user sharing, and the Data Controller also provides an Electro Mobility Service in certain locations (hereinafter: ‘**Service**’). In addition, the Parkl system allows users to equalise their Street parking as well. In the course of these activities, personal data may be provided by the recipients of the Service, i.e. users (hereinafter: ‘**User**’ or ‘**Concerned Person**’, so that the Data Controller shall draw up the present Privacy Policy from the point of view of outward processing in order to ensure the legal integrity of the related processing.
- 1.2. In these Data Protection Rules, the terms ‘us’, ‘our’, etc. shall always be understood to mean the Data Controller at any time.
- 1.3. In the present Data Protection Rules, the words and concepts in capital letters are set out in the General Terms and Conditions relating to the Parkl system (hereinafter: The **GTC** and the Terms and Conditions of Contract (hereinafter: “**TCC**”) shall have the same meaning as the terms defined.
- 1.4. The name ‘User’ shall also be understood, mutatis mutandis, for construction in the context of corporate use, and any deviation from it shall be specified separately.
- 1.5. **Explicit acceptance of these privacy rules by the user is required and consent may be withdrawn at any time.**
- 1.6. The controller shall be responsible for the formation of these Data Protection Rules, their full enforcement with the persons subject to it, and for monitoring and implementing the necessary changes. The data controller may amend these privacy rules unilaterally at any time. Some business processes and developments make it essential to expand some data processing targets later on. The Rules shall enter into force upon their publication. The version of the Policy in force at [any time is](https://parkl.net/en/policy) available on <https://parkl.net/en/policy>.
- 1.7. In each case where personal processing is required, the controller shall act in accordance with the guidelines of the GDPR and relevant legislation. The controller shall give all concerned persons the right to know, in particular, the purposes for which the personal data are processed and, where possible, the duration of the processing of the personal data, the recipients of the personal data, the logic behind the automated processing of personal data, the consequences of the processing and the information that the concerned person may receive. This right should not adversely affect the rights and freedoms of others, including trade secrets or intellectual property, and in particular copyrights protecting software (and related rights) However, those considerations cannot result in the data subject being denied all information by the Data Controller.
- 1.8. The express adoption of this privacy policy by electronic means is voluntary, specific and informed, so that personal data concerning the user can be processed. Consent is given by the user ticking the relevant box in the application, or on the Website of the Data Controller. This consent shall cover all processing activities carried out for the same purpose or purposes, but the user may at any time withdraw their consent separately for certain processing purposes, which the Data Controller shall perform in accordance with these Rules and relevant legislation.
- 1.9. The Data Controller is committed to the protection of the personal data of users and attaches the utmost importance to the respect of their right to informational self-determination, thus keeping the personal data of the users confidential and taking all security, technical and organisational measures to ensure the security of the data.

1.10. The Data Controller shall process personal data lawfully, fairly and in a transparent manner for the concerned person and may be collected only for specified, explicit and legitimate purposes, which are appropriate, relevant and limited to what is necessary for its purposes.

1.11. When processing personal data, the Data Controller shall endeavour to be accurate and up to date and shall take all reasonable measures to ensure that personal data which are inaccurate having regard to the purposes for which they are processed are erased or rectified without delay.

2. Service provider data

Name of data controller	Parkl Digital Technologies Kft.
Location of the data controller	Arany János utca 15 1 st floor 6.,
Contact details of the data controller, regular e-mail address for contact with users	info@parkl.net
Business register no.	01 09 712422
Tax number	12967726241
Registration authority name	Municipal Court of Budapest as Court of registration
Telephone	+ 3618555777
Website	www.parkl.net
Contract language	English

3. Applicable legislation

The Data Controller declares that the personal data of data subjects with no (yet) contractual relationship with the Data Controller or users contracted with it will be processed at any time in accordance with the applicable laws, in particular:

- EU legislation: General Data Protection Regulation (EU) 2016/679 of the European Union ('GDPR')
- The Fundamental Law of Hungary Article VI
- Act CXII of 2011 on the right to informational self-determination and freedom of information (Info Act)
- Act V of 2013 on the Civil Code
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services
- Act CLV of 1997 on consumer protection (Fgytv.)
- Act C of 2003 on electronic communications (Eht.)

4. Legal basis for processing data

4.1. The processing of personal data is based on the voluntary consent of the user in the light of this information (Article 6(1)(a) of the GDPR).

4.2. The controller is entitled to process data relating to users on the basis of a contract concluded between it and the users in accordance with the intended purpose of the contract for the purposes of conformity with the contract (Article 6(1)(b) of the GDPR).

4.3. The processing of personal data may be necessary for compliance with a legal obligation to which the controller is subject, such as accounting and bookkeeping obligations (Article 6(1)(c) GDPR).

4.4. The processing of personal data may be necessary for the legitimate interests of the Data Controller or a third party (Article 6(1)(f) GDPR).

4.5. Pursuant to Act XCIII of 1993 Article 13/A of the Data Processing Permit, according to which the natural identity data (name, birth name, mother's name at birth, date and time of birth) and address of users may be processed without the consent of the user for the purpose of establishing, defining, amending, monitoring the performance of the contract for the provision of an information society service, invoicing the fees resulting therefrom and enforcing the related claims, and the controller may process, without consent, the natural identity data of the user and the date, duration and place of use of the service for the purpose of billing the fees resulting from the contract for the provision of the information society service (hereinafter: **Elkertv.**)

4.6. The use of personal data for advertising purposes shall be subject to specific explicit authorisation by the user.

5. Data we process

5.1. In order for the Service User to be able to use it, the User shall disclose personal data to the Data Controller via its Application or Website. When a Data Controller requests a user to provide personal data, the user has the right to refuse to provide it, but in such a case, the Data Controller may legitimately refuse to provide the Service, so that the user may not be able to use the service intermediated or provided by the Data Controller.

5.2. In particular, the Data Controller may carry out the following activities in the context of data processing: collection, recording, attaching, organisation, storage, use for the purpose of processing, querying, blocking, erasure and destruction and preventing the re-use of the data.

5.3. The user may exercise at any time, free of charge, the restriction of the processing activities relating to the specified personal data, the rectification or erasure of the data and the right to object. Accordingly, the Data Controller shall ensure that applications are submitted electronically to the following e-mail address: info@parkl.net or via the Application In such a case, the Data Controller shall respond to the data subject without undue delay and in any event within 25 days and provide a justification if the controller does not comply with any request. The application may be submitted by filling in the forms attached to these Regulations, or independently of them, at the user's choice.

5.4. Data to be provided by Users on a mandatory basis

5.4.1. The data controller may process the following user related personal data provided by the user that is necessary for the purposes of registration for the Park application and the conclusion of the contract:

Concerned	Legal basis	Data category	Purpose of processing
Users registering in Parkl	4.1. 4.5	Name	Creation, modification and performance of a contract, Application maintenance and development, Operation and development, user identification and communication, Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, Advertising and marketing, The information used by the payment system and the billing of service charges and the payment thereof.
		Facebook account e-mail address (if different from Parkl account in case of Facebook registration)	Creation, modification and performance of a contract, Operation and development, user identification and communication.
		Facebook account password (for Facebook registration if different from Parkl account)	Creation, modification and performance of a contract, Operation and development, user identification and communication.
		Apple ID account email address	Creation, modification and performance of a contract,

Concerned	Legal basis	Data category	Purpose of processing
		(Apple ID registration if different from Parkl account email address)	Operation and development, user identification and communication.
		Apple ID account password (Apple ID registration if different from Parkl account password)	Creation, modification and performance of a contract, Operation and development, user identification and communication.
		Google account email address (in case of Google registration if different from Parkl account e-mail address)	Creation, modification and performance of a contract, Operation and development, user identification and communication.
		Google account password (in case of Google registration if different from Parkl account password)	Creation, modification and performance of a contract, Operation and development, user identification and communication.
		Microsoft account email address (Microsoft if different from Parkl account)	Creation, modification and performance of a contract, Operation and development, user identification and communication.
		Microsoft account password (Microsoft if different from Parkl account password)	Creation, modification and performance of a contract, Operation and development, user identification and communication.
		In the case of a legal person, company name, tax number, company registration number/business registration	Creation, modification and performance of a contract, Application maintenance and development, Operation and development, user identification and communication Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, Advertising and marketing,

Concerned	Legal basis	Data category	Purpose of processing
		number/registered office	The information used by the payment system and the billing of service charges and the payment thereof.
		E-mail address	Creation, modification and performance of a contract, Application maintenance and development, Operation and development, user identification and communication, Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, Advertising and marketing, The information used by the payment system and the billing of service charges and the payment thereof.
		Telephone	Operation and development, user identification and communication.
		Number plate	Creation, modification and performance of a contract, Application maintenance and development, Operation and development, user identification and communication, Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud.

Concerned	Legal basis	Data category	Purpose of processing
Ad hoc charging users for electromobility services	4.3.	E-mail address	Contract, performance; Identifying the data subject and ensuring communication;
		Telephone	Performance of a contract; Identifying the data subject and ensuring communication;
		Last four digits of the bank card number, expiry date of the card and name on the card	Performance of a contract; Identifying the data subject and ensuring communication; Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, The information used by the payment system and the billing of service charges and the payment thereof.

Concerned	Legal basis	Data category	Purpose of processing
Details of contractual contact or contact points provided during networking	4.4.	Name (surname, first name),	Contract, performance; Identification of the data subject and ensuring communication.
		E-mail address	Performance of a contract; Identification of the data subject and ensuring communication.

Concerned	Legal basis	Data category	Purpose of processing
indicated by the partner		Telephone	Performance of a contract; Identification of the data subject and ensuring communication.

Concerned	Legal basis	Data category	Purpose of processing
Person authorised to contact further depending on the decision of the Corporate Administrator and Company user nominated by a company user	4.1. 4.4.	Name (surname, first name),	Contract, performance; Identifying data subjects and ensuring communication.
		E-mail address	Performance of a contract; Identifying data subjects and ensuring communication.
		Telephone	Performance of a contract; Identifying data subjects and ensuring communication.

Concerned	Legal basis	Data category	Purpose of processing
Complainant, applicant	4.1. 4.3.	Name (surname, first name),	Carrying out a complaint-handling procedure and execution of a request Identification of the data subject and ensuring communication.
		E-mail address	Carrying out a complaint-handling procedure and execution of a request Identification of the data subject and ensuring communication.
		Telephone	Carrying out a complaint-handling procedure and execution of a request Identification of the data subject and ensuring communication.
		Address	Carrying out a complaint-handling procedure and execution of a request Identification of the data subject and ensuring communication.

Concerned	Legal basis	Data category	Purpose of processing
Candidates in the recruitment procedure	4.1.	Full name (Last name, First name)	The establishment, modification and performance of a legal relationship; employment Identifying an applicant and ensuring communication; Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud.
		E-mail address	The establishment, modification and performance of a legal relationship; employment Identifying an applicant and ensuring communication; Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud.

		Telephone	Identify an applicant and ensure communication.
		Other voluntary data in CV	Conduct a professional selection process.

Concerned	Legal basis	Data category	Purpose of processing
Employee and intermediates	4.2. 4.3.	Name (surname, first name), signature	Performance of a contract; Compliance with employment-related legal obligations (e.g. notification).
		E-mail address	Performance of a contract; Identification of the data subject and ensuring communication.
		Telephone	Identifying the data subject and ensuring communication;
		Mother's name	Performance of a contract.
		Place and date of birth	Compliance with employment-related legal obligations (e.g. notification).
		Address and postal address	
		Tax identifier	
		TAJ	
		Bank account number, bank identifiers	

5.5. Data optionally provided by Users

5.5.1. The Data Controller may process the following user related personal data provided by the User which may be registered without its activation:

Concerned	Legal basis	Data category	Purpose of processing
User registered in Parkl	4.1. 4.2. 4.5.	Last four digits of the bank card number, expiry date of the card and name on the card	Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, Information used by the payment system, invoicing of service charges and payment thereof If it is not granted, full use of the application is not guaranteed.
	4.1.	GPS data	Operation and development, user identification, Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, Provision of comfort services (Street parking) If it is not granted, full use of the application is also guaranteed.

	4.1.	Transfer of registration number by partner	Operation and development, user identification, Creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, Provision of comfort services (instant parking) If it is not granted, full use of the application is also guaranteed.
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- 5.5.2. The application of GPS with the explicit permission of the user in the Street parking, electric charging and closed local parking functions, in order to identify the position of the user in order to be able to start parking in the appropriate parking area, a charging point or a closed local parking space, thus providing a more convenient service. GPS is always used for logistical purposes and is closely linked to the availability of the service, but the service can be used without it. In this case, the user must indicate manually in which zone they intend to start parking. Under no circumstances will GPS be used to track our users. It is important to point out that the Parkl application itself does not have a separate location function, nor is it capable of determining where the user in question is, it is not capable of monitoring. In any event, GPS is the user's device's own GPS, whose data can be used by the Parkl application in accordance with the relevant choice of the user and can be switched on/off at any time by their mobile phone.
- 5.5.3. A specific function is Instant parking that each user can switch on in their application using a slide button. If the instant parking is to be used, if it is activated, the barriers of the Parkl partners will be opened automatically upon arrival of the vehicle. This does not involve the application of GPS and is always performed by means of a number plate identification using a camera. The cameras are operated in some locations by the Data Controller and at other locations by the Partner. In the locations where the operator is the Partner carrying out the actual parking activity, the related legal obligations (e.g. information to Concerned Persons) must be complied with by each partner. In locations where the camera system operator is Parkl, the Data Controller is obliged to provide adequate information to data subjects and to comply with data processing rules. To this end, the Data Controller has drawn up, in addition to the provisions of these Rules, **an electronic monitoring system rule document**, which is available at any time on the Data Controller Website. The instant parking function is also available in the framework of the Company Facility.
- 5.5.4. When using the Service, the camera use is only the number plate provided by the user when using the Instant parking service and, depending on the type of camera, the shape of the car, the Data Controller does not perform any other electronic surveillance activities related to natural persons. Some of the cameras used for the Instant parking service are operated by Partners and some cameras are operated by the Data Controller and the Data Controller stores the number plates recorded by the cameras, partly as processors.

Scope of data processed	Legal basis	Purpose of processing	Duration of processing
The registration numbers of users using instant parking services, for the primary purpose of identification, are the registration numbers of all passenger cars that enter the area monitored by the camera, in some cases the image of the car. The camera image records the registration number and, as a	4.4. The legal basis for the processing is the legitimate interest of the Data Controller or of a third party. In this context, consent may be given by indicative behaviour	For users the storage of number plates recorded by cameras may also be necessary to complete the Service, provide contactless parking services by making available the Instant parking functionality, continuously improve the Service, analyse images using artificial	The duration of the processing is set out in Chapter 6.2 of these Rules.

general rule, natural persons cannot be identified if they are nevertheless stored encrypted by the Data Controller.	through access to the parking space.	intelligence and investigate any complaints they may receive.	
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5.5.5. Balancing of interest test result

With regard to the operation of the electronic monitoring system, the Data Controller carried out the balancing of interest test the results of which are summarised below.

An analysis of whether it is absolutely necessary to install the camera involved in the processing in a given location or whether there is an alternative that avoids processing.	The purpose pursued by the data processing requires technical measures that are suitable for recognising the registration number of the car in question and are therefore suitable and essential to achieve the interests of the Data Controller. The recordings recognise the shape of the number plates and, in some cases, the car as a whole, so that processing is limited to the processing of data that are strictly necessary, and without storing the recordings for a certain period of time, it would not serve to maintain and improve the service and, in the case of complaint-handling, to prove and verify what has been done.
The determination of the legitimate interest which requires processing.	The legitimate interest cannot only be considered to be in the interest of the Data Controller since a modern, contactless parking solution is also in the interest of modern society, and without maintaining and continuously improving the Service, it is not possible to keep the Service updated and improved in the light of practical experience. The legitimate interest of the Data Controller in the legitimate handling of complaints is a legally recognised interest that protects the interests of the consumer and a fundamental interest in the possibility of proof by the Data Controller.
The definition of the purpose of the processing, the duration of the processing of the image requires the legitimate interest of the Data Controller.	At the discretion of the controller, the minimum duration of processing is necessary to enable it to correct errors and improve the service, as well as to assess and respond to any complaints received.
What legitimate interests and rights of data subjects against processing can be identified.	The controller shall provide the data subject with complete, clear and comprehensible information on the scope of the personal data processed, the basis, means, time and rights of the data subject in relation to the processing, and that such data are kept for as short a period as possible and shall be accessible only to the persons necessary for the performance of their work.
To determine why the legitimate interest of the Data Controller is proportionately limiting to the legitimate interest of the data subject.	The restriction of the data subject's right to self-determination with their personal data does not constitute an absolute and unrestricted right and is therefore permissible in the case of necessity and proportionality of the processing. Making available the instant parking function as a comfort service can be considered as another legitimate interest and may be understood as a public interest in handling complaints.

On the basis of the outcome of the balancing of interest test it can be concluded that the right of the concerned person does not take precedence over the legitimate interest of the Data Controller and that the processing constitutes a necessary and proportionate restriction on the concerned person

5.5.6. Where private parking is used under an individual agreement, only a defined range of users who do not provide any additional data compared to other users shall be entitled to use it. Private parking is used using the instant parking function.

5.6. Data collected automatically from the application, the payment system and the website

5.6.1. The scope of the Service-related information automatically collected by the Data Controller which is necessary for the proper performance and further development of the Service:

Concerned	Legal basis	Data category	Purpose of processing
User registered in Parkl	4.1. 4.2.	Registration Date	Application maintenance and development, advertising and marketing.
		Registration channel	Application maintenance and development, advertising and marketing.
		Details of on-going parking	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Number of parkings	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Duration of parking	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Amount to be paid per parking	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Data on on-going electric charge	Application maintenance and development,

Concerned	Legal basis	Data category	Purpose of processing
			creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Number of electric charges	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Duration of electric charge	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Amount to be paid per electric charge	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Method of payment for corporate users	Application maintenance and development, creating and maintaining a reliable and secure environment; billing of information and service charges used by the payment system.
		Details of the motorway vignette purchased in the Parkl application	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.
		Number of active motorway vignettes purchased in the Parkl application	Application maintenance and development, creating and maintaining a reliable and secure environment, demand and enforcement, prevention and management of fraud, advertising and marketing, billing of information and service charges used by the payment system.

Concerned	Legal basis	Data category	Purpose of processing
		Price of motorway vignettes purchased	Application maintenance and development, creating and maintaining a reliable and secure environment; billing of information and service charges used by the payment system.
		Viewed data in the Parkl application or on the Website	Application maintenance and development, advertising and marketing.
		Logging data and tool information	Application maintenance and development, advertising and marketing.
Website users	4.1.	Data collected by Facebook pixel	Application maintenance and development.
		Data collected by Google Tag Manager	Application maintenance and development.
		Data collected by Hotjar	Application maintenance and development.

5.7. Data collected from third parties

5.7.1. The user data collected by the Data Controller from third parties, the provision of which is the responsibility of the user and the provider does not supervise it, is not responsible for the collection and processing of such data by third parties and the transmission of which to the provider must always be authorised by the user on the interfaces of those third parties.

5.7.2. Third-party services: if a user uses a third party provider (e.g. Facebook) when registering to the application or logging in, the Service provider shall have the right to retrieve from that third party provider the data of the user necessary for the use of the Application. It also includes the registration number in the case of instant parking which each parking partner transmits to the Parkl system so that the barrier can automatically open upon arrival of the car (see: 5.4.3). The data protection settings of the third party provider shall apply to the provision or change of this information.

5.8. Data controller cookies

5.8.1. If the user does not explicitly provide information about himself, the Data Controller shall not collect or process any personal data relating to the user in such a way that the user can be identified by the individual.

5.8.2. Cookies are short text files sent by the browser to the hard disk or mobile device of the user and contain user information. Such data is the data of the user login computer or device generated by the use of the website or application and recorded by the cookies used as an automatic result of technical processes. The data to be automatically recorded shall be logged automatically when visiting the website or app or upon exit, without any specific declaration or action by the user.

5.8.3. Using Parkl, all users consent to the use of session type cookies at the discretion of the Data Controller on the website or in the context of the application, if the use of session type cookies is essential to enable visitors to browse the website or application to use its functionalities, e.g. noting a visitor's operations on a given page. These cookies are valid only for the visitor's current visit and are automatically deleted from the computer at the end of the session or by closing the browser.

5.8.4. Data controller only uses cookies managed by external service providers (e.g. Google).

5.8.5. The advertisements of the Data Controller are displayed on internet sites by external service providers (Google, Facebook). These external service providers (Google, Facebook) store cookies to remember that the user has previously visited the Data Controller website or its application and, on that basis, displays the advertisements to the user in a personalised manner (i.e. remarketing activities).

5.8.6. The processing of the above-mentioned external service providers is subject to the data protection rules set by these providers and the Data Controller accepts no responsibility for such processing.

- 5.8.7. Use of the above-mentioned technologies: the data collected with the above technologies shall not be used to identify a user nor shall the Data Controller link this data to any other data that may be identified.
- 5.8.8. The primary purpose of the use of such data is to enable the Data Controller to operate the website and app properly, which requires, in particular, the monitoring of visiting data and the detection of possible misuse. In addition, the Data Controller may use this information to analyse usage trends, improve and develop the functionalities of the website or application and obtain comprehensive traffic data on their full use. The Data Controller may use the information thus obtained to compile and analyse statistics on use and to use statistical data that are not suitable for such identification (e.g.: number of visitors, most viewed topics or content) to third parties or make them available to the public on an aggregated basis and anonymously.
- 5.8.9. **Possibility to switch off cookies:** if a user does not wish to collect the information described above from a Data Controller in the context of the use of the website or app, they **can switch off the cookies in the internet browser's settings in whole or in part**, or otherwise change the settings of the cookie messages, acknowledging that this may make the use of the application more difficult.

6. How and how long do we use the data we collect?

- 6.1. The controller only processes personal data which are essential to achieve the purpose of the processing and are suitable for that purpose and only to the extent and for the time necessary to achieve that purpose.
- 6.2. In the absence of any relevant legal obligation of the controller, it shall not make public, harmonise or connect the personal data at its disposal.

Purpose of processing	Justification of purpose	Duration of processing
Creation, modification and performance of a contract	The Data Controller shall use the data collected by it or through third-party service providers for the purpose of establishing, modifying and performing the Contract as set out below. The personal data obtained through the use of the Service are intended to facilitate and enable the transaction requested by the user. The Data Controller uses the personal data of the user to enable the user to contract the service order and to facilitate the performance of the contract.	Process data relating to data processing users during and after the contractual relationship established until the user requests their deletion by e-mail to support@parkl.net Except for data processed by Facebook pixel, Google Tag Manager and Hotjar, as it will always be deleted 1 year after collection. The data of the user concerned will be processed within the general limitation period (5 years) or, in the case of a dispute, 5 years after its final closure, or for 10 years after the deletion provided for in the Infotv., if relevant (Section 25/F(4) of the Infotv.).
Maintenance and development of application and services	The Data Controller shall use the following data collected by the Data Controller or through third-party service providers for the purpose of maintaining and developing the Service. The personal data obtained through the use of the Service are intended to facilitate and keep up to date the transaction requested by the user through the Application The Data Controller uses the personal data of the user to enable the user to continuously improve and develop the Application	
Operation and development, user identification and communication	Data Controller may use the User's personal data to provide an efficient service and to conduct analytics and to assess the satisfaction of the user through the contact details provided by the user. In this context, it may carry out the following activities: Access to and use of an application and ensure its operation, protection, improvement, development	

Purpose of processing	Justification of purpose	Duration of processing
	and optimisation, support, update, security information.	
Creating and maintaining a trusted and secure environment, demand and enforcement, prevention and management of fraud	Data Controller may also use User's personal data to ensure the legitimate interest of the users in the use of the Service and to comply with the provisions of the GTC explicitly adopted by the user and the relevant legislation. In this context, it may carry out the following activities: prevention and elimination of fraud, spam, abuse and other harmful activities, security investigations and risk assessment, verification and validation of data provided by the user	
Advertising and marketing	The personal data of a user will only be used by the Data Controller to process the following advertising and marketing activities: sending promotional messages, advertisements, newsletters, other service information, both via application and e-mail, displaying advertisements, advertisements on the basis of individual search preferences, displayed via Parkl Application or Website and also via Facebook and Instagram, displaying prize games, surveys, promotional activities and events sponsored by Data Controller or partners working with it.	Unsubscribing from advertisements can be requested at any time via support@parkl.net or in the profile settings, as well as directly in the case of newsletters, by clicking on the section in the newsletter e- mail or under the settings tab in the app. Failing this, a Data Controller will store them for a maximum period of 5 years.
Invoicing of information used by a payment system, service charges	The Data Controller uses the SimplePay Online Payment System for transactions through application which, for users of the Service, operates as follows, by entering the bank card data, the Data Controller can: by entering the bank card data, the provider authorises access to and use of payment services. The provider is not responsible for the continued operation of the SimplePay Online Payment System and does not process the data contained therein, and has no influence on its operation and privacy settings.	The Data Controller shall process data relating to Users during and after the contractual relationship established until the user requests their deletion by e-mail to support@parkl.net The data of the user concerned will be processed within the general limitation period (5 years) and for the period laid down in the relevant legislation (8 years) or, in the case of a dispute, 5 years after its final closure, or for 10 years after the deletion provided for in the Infotv., if relevant (Section 25/F(4) of the Infotv.

Purpose of processing	Justification of purpose	Duration of processing
Conduct a complaint-handling procedure	Verification and documentation of the conduct of the procedure and of the actual examination.	The controller shall process the data concerned until the purpose of the processing has ceased or shall delete them when further processing is no longer necessary for the purpose of processing. In accordance with consumer protection rules, it stores them for 5 years or is kept for 10 years after the deletion provided for in the Information Act, if relevant (Section 25/F(4) of the Information Act).
Compliance with employment-related legal obligations (e.g. notification)	Compliance with relevant legal obligations relating to notification, reporting, taxation, contributions, etc.	The Data Controller keeps the data in a register for 5 years from the end of the calendar year of exit, with the prohibition of scrapping labour, wage and social security records. Otherwise, the limitation period in employment law is 3 years.
Providing users with a comfort function by making available the instant parking functionality.	The service provider needs the handling of camera images, such as number plates, solely in order to make the Service available, maintain and continuously improve it with the help of artificial intelligence using machine learning to achieve greater accuracy in reading and to see the number plates in any complaint handling procedures.	The controller shall process the data concerned until the purpose of the processing has ceased or shall delete them when further processing is no longer necessary for the purpose of processing. As a general rule, the Data Controller stores camera images of the number plates for 30 days.

7. Who can discover the data processed (data transfer)?

- 7.1. In order to ensure the smooth functioning of the Service, it may be necessary to transfer certain data to third parties, which will always be communicated to concerned parties as described in this point. The Data Controller and its employees and contributors are entitled to access personal data in accordance with the legislation in force
- 7.2. The data controller may only transfer the personal data of the user within a company to the Parkl Partners contracted with him for the purpose of ensuring the proper performance of the Service, for quality assurance reasons and for the investigation of any customer complaint or dispute. The user expressly agrees to this data transfer by adopting these Rules.
- 7.3. Where a data transfer takes place, the Data Controller shall keep a transfer register containing the date on which the personal data it processes, the legal basis and the recipient of the data transfer, the definition of the personal data transferred and other data specified in the law requiring the processing.
- 7.4. Data transfers may take place in the following cases:

Data transfer recipient	Scope of data that can be transmitted
Sharing data with Parkl Partners	If the Service is used, the Data Controller shall send to the Parkl Partners with which it has a contractual relationship the personal data that are essential for the use of the Service. This information is as follows: registration number.
Sharing with employees	The personal data listed in point 5 above may be accessed by the provider of the service, including an employee of the provider only where the processing of those data is strictly necessary for the purposes for which the data are processed in accordance with the specific data group.
Share with SimplePay Online Payment System	<p>The fee for using the Service is paid through the SimplePay Online Payment System operated by OTP Mobil Kft. The user registers his bank card data directly in SimplePay, and the Data Controller only has access to the following data: the last four digits of the bank card number, the expiry date of the bank card and the name on the bank card.</p> <p>In the SimplePay Online Payment System, raw card data are not actually saved, either at the data controller or on SimplePay's servers. A so-called TOKEN identifies the saved card, which is returned to the Data Controller by SimplePay in the IPN message. Bank card data are handled in accordance with the card security policies. Neither the Data Controller nor SimplePay have access to the bank card data. The service is governed by SimplePay's privacy policy.</p>
Electronic invoice issuing system	When using a service, it is possible to request the issuance of an electronic invoice via the www.szamlazz.hu system operated by KBOSS.hu Kft., which is governed by the szamlazz.hu data protection policy.
Magex Solutions Kft.	Towards our partner providing system operation and server services
Venilia Vellum Kft. CG: 01-09-566797	To our accounting service partner (data on employees, intermediates and invoicing)
Socially Kft. CG: 01-09-188393	Towards a marketing partner (user name, accessible content of a social media account)
Nemzeti Mobil Fizetési Zrt. CG: 01-10-047569	Only the registration number is sent to Nemzeti Mobil Fizetési Zrt as Partner for Street parking and the purchase of motorway vignettes.
Swarco Traffic Hungaria Kft. CG: 01-09-070703	The Data Controller has contracted with Swarco in cooperation with certain Partners, whereby the hardware equipment is provided by Swarco and the Parkl system is provided by Parkl, so that Swarco also has access to the license plate data detected by the camera.
Publicly available information	The Data Controller shall only disclose to the public information to which the Concerned consents, which the Data Controller is entitled to display on its Partners' community/public interfaces. Such data may include:

Data transfer recipient	Scope of data that can be transmitted
	comments from the Application Download Point or other public community forums.
Conformity with law	The controller shall not transmit the personal data made available to it to any third party or parties other than those referred to in point 7 above, except where authority, state, administrative body, court has a legal obligation to refuse it and the Data Controller is not entitled to refuse it on the basis of the relevant legislation.
Customers contracted with a data controller under the Corporate Contractual Terms	A company user included in the Company Contract Terms and Conditions shall have access to the parking and electric charging data of the individual listed users belonging to the company user that they have entered into the system, and to see the location at which the individual list user used the Data Controller service and the time slot.

7.5. Under no circumstances is the controller responsible for the processing of data by third party providers (e.g. Google, Facebook, Partner, OTP Simple Pay, etc.), which is always governed by the providers' own data processing policies.

7.6. In order to ensure the smooth operation of the Service, the service provider uses the assistance of a variety of third party service providers. Which service providers are exclusively:

Hosting service provider	Name: Microsoft Ireland Operations Limited Address of hosting service provider: Block B, Sandyford Industrial Estate, Atrium Building, Carmanhall Rd, Sandyford, Dublin 18, Ireland Hosting service number: + 353 1850 940 940 E-mail address of hosting service provider: info@microsoft.com Hosting service provider's website: www.microsoft.com
Company operating a system with a contract with a data controller	Name: MAGEX Solutions Kft. Seat: 8800 Nagykanizsa, Örtorony utca 35/b Company register number: 20-09-076039 Tax number: 13630126-2-20 Represented by: Attila Lovas

7.7. The data processor stores the personal data made available to the Data Controller in the course of its activities. The Data Controller expressly states that it is not responsible, directly or indirectly, for the data management and security of Microsoft Ireland Operations Limited and that it is subject to the Data Processor's privacy policies and guidelines.

7.8. The Data Controller reserves the right to involve sub-processors in the processing in the future and inform users of this by amending these Rules.

The personal data of the users will not otherwise be removed from the processing of the data controller.

8. Rights and obligations of the user

8.1. Management of data concerning a user

8.1.1. The concerned person shall have the right to access the data collected concerning them and to exercise that right easily and at reasonable intervals in order to establish and verify the lawfulness of the processing. The Data Controller strives to keep the personal data accurate and up-to-date, but the Data Subject is obliged to notify the Service Provider of any changes to the data at the following e-mail address: info@parkl.net. The person concerned shall be responsible for keeping the personal data up to date.

8.1.2. The controller shall take appropriate measures to provide the concerned person with all information relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form and in a clear and plain language. On request, information may be requested mainly electronically via [email](mailto:info@parkl.net) to info@parkl.net or vocally by phone + 3618555777, as well as at the headquarters of the Data Controller in person. The information shall always require proof of the identity of the concerned person

- 8.1.3. The Data Controller shall inform the data subject of its action in response to the request without undue delay and in any event within one month of receipt of the request. Where necessary, taking into account the complexity of the application and the number of applications, that 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.
- 8.1.4. If the Data Controller does not act upon the request of the concerned person it shall inform the data subject without delay, and at the latest within one month of receipt of the request, of the reasons for the non-action and of the possibility for the concerned person to lodge a complaint with the Supervisory Authorities and that the Right of Judicial appeal is available.
- 8.1.5. This right of the concerned person shall be granted free of charge by the Data Controller but where the request is unfounded or excessive, e.g. due to recurring use of the request, taking into account the administrative costs involved in providing the requested information or brief or taking the requested action, the Data Controller may refuse the action or charge a fee.
- 8.1.6. Where the Data Controller processes a large amount of information concerning the data subject, it may request the data subject to specify, before disclosing the information, to which information or processing activities their request relates.
- 8.2. Access
- 8.2.1. The Data Controller shall take all reasonable measures to establish the identity of the data subject requesting access, in particular in relation to online services and online identifiers. The Data Controller shall not retain personal data for the sole purpose of responding to possible requests.
- 8.3. Data correction and deletion
- 8.3.1. The concerned person has the right to request the rectification of personal data relating to them and the 'right to be forgotten' if the retention of the data in question infringes the provisions of a law.
- 8.3.2. The concerned person shall have the right to have their personal data erased upon request and no longer processed if the collection or other processing of the personal data is no longer necessary in relation to the purposes for which it was originally processed.
- 8.4. Withdrawal of consent and restriction of processing
- 8.4.1. The data subject shall have the right to withdraw their prior authorisation to process their personal data. That right is particularly relevant where the data subject has given their consent as a child, when they were not yet fully aware of the risks of the processing and subsequently wishes to remove the personal data in question, in particular from the internet. The concerned person may exercise this right even if they are no longer a child.
- 8.4.2. However, the continued retention of such personal data may be considered lawful if it is necessary to protect the exercise of the right to freedom of expression and information, compliance with a legal obligation or the performance of a task carried out in the public interest, etc.
- 8.5. Right to object/Right to Prohibition
- 8.5.1. The concerned person shall be guaranteed to object to the processing of data relating to their individual situation if the personal data can be lawfully processed because 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 the legitimate interests of the Data Controller or of a third party.
- 8.6. Right to data portability
- 8.6.1. The concerned person shall be guaranteed to object to the processing of data relating to his or her individual situation if the personal data can be lawfully processed because 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 the legitimate interests of the Data Controller or of a third party.
- 8.7. User obligation
- 8.7.1. A user can only provide their own personal data when using the service and declares their quality, i.e. its legality, reality and correctness, on their criminal responsibility. If you do not provide your own personal data, the data provider is obliged to obtain the consent of the data subject. If the Data Controller has doubts as to the quality of the data to be provided, it may request the user to provide evidence in accordance with the GTC

If the user does not wish to do so, or if the Data Controller does not find it lawful, true or correct on its own authority, the data of the user shall no longer be processed and the Data Controller shall be entitled to refuse to provide the service, i.e. the user shall immediately be refused the provision of the service, i.e. without further warning or full justification, if the breach can be remedied, until such time as the breach can be remedied, or, if it cannot be remedied, erase it, or to exercise any of the legal consequences provided for in the GTC, the TCC or other relevant contracts or legislation.

8.7.2. The controller is not liable, directly or indirectly, for any legal consequences arising from the fact that the user has not provided their own personal data or that it is not true, even if, in the event of doubt, they have requested its justification.

8.8. Acknowledges that the data subject's request to exercise their rights under points 8.3 to 8.6 may fail to fulfill the purposes of the processing, which may result in a failure to perform the Service. Nor can personal data be erased in cases where a Data Controller is required to comply with its legal obligation to retain or store that data. The Data Controller shall at any time duly inform the data subject, giving reasons, if the concerned person is prevented from complying with its request.

9. Automated decision-making and profiling

9.1. The controller shall carry out automated decision-making in the application of the following functionalities:

	Functioning of automated decision-making	Technology	Purpose and reason
Instant parking	The Concerned person expressly chooses to allow the user to open the barrier automatically by means of a phone or app when parking in or leaving a barrier-blocked car park, but automatically opens by means of camera identification, thereby automatically starting the parking period.	By means of number plate-reading cameras installed at the barriers.	User comfort, technological support for parking and continuous improvement to enable the concerned person to park as easily, quickly and practically as possible and the system to operate more and more accurately, the recordings may also be viewed for the purpose of remedying the complaint in the event of a complaint.
Street parking	The user explicitly chooses to allow the parking zone that governs it to appear automatically on a map, so that they can only start the Street parking by a button, instead of looking for the exact zone in which to start the parking time. This functionality does not in itself have any specific legal consequences for the user only if it explicitly initiates parking after positioning. Parking does not start automatically.	Installed GPS of the phone	User comfort and technological support for parking in order to be able to park as easily, quickly and practically as possible.
Electrical charging	The user explicitly chooses to allow the nearest recharging point of their current position to appear	Installed GPS of the phone	User comfort, technological support for electric charging, so that you can charge as easily,

	automatically on the main screen, so that they can only access the charging point's data sheet with a button press, instead of finding the exact recharging point on the map. This functionality does not in itself have any specific legal consequences for the user only if it explicitly initiates the charging after the location. Charging does not start automatically.		faster and more practically as possible.
Street parking	The user explicitly chooses to allow the closest parking space of their current position to appear automatically on the main screen, so that they can only access the parking space with a button press, instead of finding the exact parking place on the map. This functionality does not in itself have any specific legal consequences for the user only if it explicitly initiates parking after positioning. Parking does not start automatically.	Installed GPS of the phone	User comfort and technological support for parking so that they can park as easily, quickly and practically as possible.

The above functionalities will only be applied if the user is explicitly switched on in their account, and in any case the user is able to switch it off according to their individual choice. In the latter case, automated decision-making with regard to the definition of the user on a GPS basis will cease, but for the operation of the Instant parking function, the camera identification is operated for the relevant registration number plate of each particular area, due to the nature of the service. If the user is of the opinion that the barrier has been erroneously opened or a non-compliant zone has been identified by the Parkl, the user is able to manually start or stop the parking, or Parkl support is available. According to this, at any time we ensure the right to request human intervention through Parkl support and the right to object to the decision in accordance with our related complaint handling procedures. As a result of automated decision-making, the user is not discriminated against, their rights suffer no infringement has no significant impact at individual or group level and is always based on their consent. The data collected will always be used for the direct purpose, not used for different purposes (e.g. marketing) and stored only for as long as it is necessary for each parking event to be performed in conformity with the contract without complaint.

9.2. For your informed consent, the user considers the following important:

Function	Personal data concerned	Use of the data	Consequence of use
Instant parking	Registration number (on the basis of which the position of the user can be deduced incidentally)	The barrier opens without a separate button press as soon as the car arrives before it and reads the registration number, so that the parking period begins. The data will also be used by	The parking service starts and the parking period begins, which gives rise to an obligation to pay.

		maintaining, developing and analysing the Service to clarify it, and may be necessary during the complaint-handling process. The Partner operating the car park will make us aware of the registration number by means of data transfer	
Street parking	User position GPS data	To start the Street parking the map indicates where the user is parked and identifies the appropriate parking zone so that the user can start the appropriate parking. The State partner becomes aware of the number plate and the relevant parking zone, but not of the GPS data.	Parking begins by means of a separate button and gives rise to a payment obligation. If GPS data are inaccurate, starting parking time in a bad parking zone may result in a parking fine. In any event, GPS operates independently of the Parkl app and is located in the user's telephone.

9.3. We do not perform profiling, e.g. looking individually into parking habits and drawing consequences for the individual.

10. Additional important information

10.1. Records of processing activities

It complies with the obligation to record the processing activity and keeps the data processing records, which are relevant with regard to the employment activity.

10.2. Data protection officer

We consider that the obligation to appoint a Data Protection Officer does not require the Liable/Obligated Provider to comply, given that the main activities of the Data Controller do not involve processing operations that allow for large-scale, regular and systematic monitoring of concerned persons and that the Data Controller does not process special categories of personal data or data related to criminal offences in the course of its activities.

10.3. Supervisory and other authorities

The territorial scope of this privacy policy may also extend to other foreign authorities where the user is involved in relation to a registered office or establishment outside Hungary.

10.4. Processing of sensitive data

The controller declares that it will not process data which, by their nature, are particularly sensitive to fundamental rights and freedoms and which require specific protection, as the conditions under which they are processed pose significant risks. If a Data Controller were to process such particularly sensitive data, it will be particularly vigilant in this regard and only to the extent necessary.

The controller declares that it will not process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data for the purpose of uniquely identifying a natural person, health data or personal data revealing a natural person's sex life or orientation.

11. Data breach

11.1. In the event of a personal data breach, we will report the personal data breach to the Supervisory Authorities within 72 hours of becoming aware of it, in accordance with the law, and keep a record of personal data breaches. In the cases provided for by law, the users concerned will also be informed of it.

11.2. If the concerned person perceives a situation of a personal data breach, please notify it immediately to the Data Controller using the Data Incident Notification Form available as part of the personal data breach management policy, attached to

this Regulation. Detailed rules on our procedure in the event of a personal data breach can be found in our personal data breach management policy

12. Complaint handling, Competent Supervisory Authorities

12.1. In case of a request or complaint by a concerned person concerning any of our personal processing, we will have the possibility to report them at any of the following contact details: in person: Arany János utca 15,1051 Budapest Door 1, e.g. 6, by telephone: (+ 36) 1 8555-777, by post: Arany János utca 15,1051 Budapest 1 e.m. door 6 or by e-mail: info@parkl.net Attachment No 1 to these Rules is the Request and Complaints Management Policy, which sets out in detail our procedure for lodging a complaint, and includes the Written Complaints Form, after which the concerned person may return it to the Data Controller by post or e-mail.

12.2. The data subject has the right to lodge a complaint with the competent Supervisory Authorities in the event of an infringement of a right relating to the processing of Parkl. In view of the fact that the Data Controller has its seat in the territory of Hungary, the competent national Supervisory Authorities in relation to the processing of personal data governed by the current Data Protection Code

National Authority for Data Protection and Freedom of Information

Website: <http://naih.hu>

Postal address: 1530 Budapest, Pf.: 5.

E-mail: ugyfelszolgalat@naih.hu

Telephone: + 36(1)391-1400

12.3. In addition, an action may be brought against Parkl before the Fővárosi Törvényszék (Budapest High Court) in the event of a breach of the protection of personal data.

13. Changes to privacy policy

13.1. The Service Provider reserves the right to amend these Data Protection Rules at any time. In the event of an amendment, this will be published immediately at <https://parkl.net/en/policy>

13.2. In the case of an amendment, a notification will be sent to the concerned person by e-mail no later than 30 (thirty) days before the date of entry into force.

13.3. If the concerned person disagrees with any amendment, they may object by e-mail to info@parkl.net and ask for their data to be deleted.