

**DATA PROTECTION POLICY**

Effective date: 01/08/2020

**Please read this Data Protection Policy carefully before using the Parkl System. This Data Protection Policy records all information relating to Parkl's data processing, including data collection, use, storage, publication and erasure, having particular regard to the General Data Protection Regulation No 2016/679 of the European Parliament and of the Council (hereinafter referred to as the GDPR), as well as the provisions of Act CXII of 2011 on the right to informational self-determination and the freedom of information (hereinafter referred to as the Data Protection Act).**

**1. Preamble**

- 1.1. Parkl Digital Technologies Kft. (hereinafter referred to as the **Data Controller**) is a business association incorporated and operating in Hungary, with the provision of IT services being its main scope of activities. The Data Controller corresponds to the Service Provider specified in the General and Corporate Terms and Conditions. The Data Controller intermediates its partners' parking services through the software developed by it and the related mobile application (hereinafter referred to as the **Parkl**), as well as the related infrastructural platform and devices (hereinafter referred to as the **Parkl System**), thanks to which its users can access free parking lots through community sharing, as well as it provides electro-mobility services at certain locations (hereinafter referred to as the **Service**). In addition to the above, the Users may settle also their street parking transactions through the Parkl System. During these activities, personal data may be made available to the users of the Service (hereinafter referred to as the **User** or **Data Subject**), therefore the Data Controller creates this Data Protection Policy in relation to data processing outside the company in order to ensure the lawfulness of the relevant data processing.
- 1.2. Under this Data Protection Policy, the expressions "us", "ours", etc. shall be understood as referring to the Data Controller.
- 1.3. The words and notions with big initials under this Data Protection Policy shall have the meaning as defined in the General Terms and Conditions (hereinafter referred to as the **T&Cs**) and the Corporate Terms and Conditions (hereinafter referred to as the **CT&Cs**) applicable to the Parkl System.
- 1.4. Of course, the notion of User shall also apply in case of Corporate use and any derogations will always be indicated specifically.
- 1.5. **This Data Protection Policy shall be accepted expressly by the User and such consent may be revoked at any time.**
- 1.6. The Data Controller shall be responsible for developing this Data Protection Policy, causing compliance with this Data Protection Policy by the persons falling under its scope, for verifying such compliance and carrying out the necessary changes. The Data Controller may amend this Data Protection Policy unilaterally at any time. Certain business processes and development make essential the future extension of specific data processing purposes. The Policy shall enter into effect upon publication. The Policy version applicable from time to time is available at <https://parkl.net/policy> Website.
- 1.7. In all cases requiring personal data processing, the Data Controller shall act in accordance with the GDPR and the guidance provided by the applicable laws. The Data Controller shall make possible for all Data Subjects to know in particular the purpose of personal data processing, as well as, where possible, the period to which the personal data processing relates, the recipients of the personal data, the logic on which the automated processing of personal data is based, as well as the consequences of data processing and the information that may be supplied to the Data Subject. Such rights shall not affect others' rights and freedoms, including trade secrets and intellectual properties, in particular the copyrights ensuring software protection. Such considerations, however, shall not result in the Data Controller refusing to give any information to the Data Subject.
- 1.8. The express electronical acceptance of this Data Protection Policy is based on voluntary and specific information and the User's personal data may only be processed based on such acceptance. The User gives his consent by ticking the relevant box at the Data Controller's Website or in the Data Controller's Application. Even though such consent covers all data processing activities carried out for the same purpose(s), the User may also withdraw his consent only with respect to specific data processing purposes which shall be respected by the Data Controller in accordance with this Policy and the applicable laws.

- 1.9. The Data Controller is committed to protect the User's personal data and deems highly important that the User's right to informational self-determination be respected; accordingly, the Data Controller processes the Users' personal data confidentially and takes all the safety, technical and organisational measures that guarantee data security.
- 1.10. The Data Controller shall process the personal data lawfully and fairly, as well as in a manner that is transparent to the Data Subject, collect the data only for specific, clear and lawful purposes in a proper and relevant manner and only to the extent necessary.
- 1.11. In processing the personal data, the Data Controller shall seek to ensure the accuracy and actuality of the data and takes all reasonable measures in order to cause erasure or rectification of the personal data that is inaccurate for the purposes of data processing, without delay.

## 2. Service Provider's Data

Data Controller's name	Parkl Digital Technologies Kft.
Data Controller's registered seat	H-1051 Budapest, Arany János utca 15. 1. em. 6. ajtó
Data Controller's contact details, email address used regularly for keeping contact with Users	info@parkl.net
Company registration number	01 09 712422
Tax number	12967726241
Name of the registering authority	Budapest-Capital Regional Court as Court of Registration
Telephone number	+36309719900
Website	www.parkl.net
Language of the agreement	Hungarian

## 3. Applicable laws

The Data Controller declares that it will always process the personal data of data subjects not (yet) being in a contractual relationship with it and of Users entered into a contract with it, in accordance with the applicable laws, including in particular the following:

- EU legislation: General Data Protection Regulation No (EU) 2016/679 of the European Union (the GDPR)
- Hungary's Fundamental Law, Article VI
- Act CII of 2011 on the right to informational self-determination and the freedom of information (the Data Protection Act)
- Act V of 2013 on the Civil Code (the Civil Code)
- Act CVIII of 2001 on certain aspects of the electronic commercial services and services related to the information society (the E-commerce Act)
- Act CLV of 1997 on consumer protection (the Consumer Protection Act)
- Act C of 2003 on electronic communications (the Electronic Communications Act)

## 4. Legal Basis for Data Processing

- 4.1. The processing of personal data is based on the User's voluntary consent given based on the information hereunder (Article 6(1)(a) of the GDPR).
- 4.2. Data Controller shall be entitled to process the Users' data under an agreement with such Users, in accordance with the purpose of such agreement and for the purpose of contractual performance (Article 6(1)(b) of the GDPR).
- 4.3. The processing of personal data may be necessary for complying with a legal obligation to which the Data Controller is subject or for meeting e.g. accounting and bookkeeping obligations (Article 6(1)(c) of the GDPR).
- 4.4. The processing of personal data may be necessary in order to enforce the Data Controller's or a third party's lawful interests (Article 6(1)(f) of the GDPR).
- 4.5. The data processing authorisation provided under Section 13/A of the E-commerce Act according to which no consent from the User is required for processing the User's natural personal identification data (name, name at birth, mother's name at birth, place and date of birth) and address for the purposes of creating an agreement for the supply of services related to the information society, determining, amending or monitoring the performance of such agreement, invoicing the fees accruing under such agreement, as well as enforcing claims under such agreement, and no consent from the

User is required for treating the User's natural personal identification data, address, as well as data relating to the time, duration and place of service use for the purposes of invoicing the fees accruing under an agreement for the supply of services related to the information society (hereinafter referred to as the **E-commerce Act**.)

4.6. The use of personal data for advertising purposes shall be subject to the User's specific and express consent.

## 5. Data Processed by Us

5.1. In order to use the Service, the User discloses personal data to the Data Controller through the latter's Application or Website. If the Data Controller requests personal data from the User, the User shall be entitled not to provide such personal data, but in such case the Data Controller may lawfully refuse to supply the Service, therefore the User may not be able to use the Service intermediated or supplied by the Data Controller.

5.2. In the framework of data processing, in relation to the data, the Data Controller may carry out in particular the following activities: collection, recording, registration, classification, storage, use in accordance with the purpose of data processing, retrieval, blocking, erasure and destruction, as well as hindering the further use of such data.

5.3. The User may exercise the right to restrict data processing activities in relation to the specified personal data, rectify or erase the data, as well as the right to object at any time and free of charge. Accordingly, the Data Controller ensures the electronic submission of requests to info@parkl.net email address through the Application. In such case, the Data Controller shall reply to the Data Subject without delay, but in any case within 25 days and if the Data Controller does not grant such request, it shall provide the grounds for refusal. The request may be submitted by filling in the forms attached to this Policy or otherwise at the User's choice.

### 5.4. Data which shall be supplied mandatorily by the Users

5.4.1. The Data Controller shall be entitled to process the following User-related personal data that have been supplied by the User and the supply of which is necessary for registration in the Parkl Application and for contracting:

Data Subject	Legal basis	Data category	Purpose of data processing
User registered in Parkl	4.1. 4.5	Name	Conclusion,, amendment, performance of the agreement Maintenance and development of the application, Operation and development, user identification and ensuring communication, Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Advertising, marketing activity, Information used by the payment system, invoicing and settlement of the Service fee
		Password	Operation and development, user identification and ensuring communication
		Email address connected to the Facebook account (in case of Facebook registration if it is different from the email address connected to the Parkl account)	Conclusion, amendment, performance of the agreement, Operation and development, user identification and ensuring communication

Data Subject	Legal basis	Data category	Purpose of data processing
		Password connected to the Facebook account (in case of Facebook registration if it is different from the password connected to the Parkl account)	Conclusion, amendment, performance of the agreement, Operation and development, user identification and ensuring communication
		The e-mail address connected to the Apple ID account (in case of Apple ID registration if it is different from the email address connected to the Parkl account)	Conclusion, amendment, performance of the agreement, Operation and development, user identification and ensuring communication
		The e-mail address connected to the Apple ID account (in case of Apple ID registration if it is different from the password connected to the Parkl account)	Conclusion, amendment, performance of the agreement, Operation and development, user identification and ensuring communication
		Company name, tax number, company registration number in case of legal persons	Conclusion, amendment, performance of the agreement, Maintenance and development of the application, Operation and development, user identification and ensuring communication Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Advertising, marketing activity, Information used by the payment system, invoicing and settlement of the Service fee
		Email address	Conclusion, amendment, performance of the agreement, Maintenance and development of the application,

Data Subject	Legal basis	Data category	Purpose of data processing
			Operation and development, user identification and ensuring communication, Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Advertising, marketing activity, Information used by the payment system, invoicing and settlement of the Service fee
		Phone number	Operation and development, user identification and ensuring communication
		License plate number	Conclusion, amendment, performance of the agreement, Maintenance and development of the application, Operation and development, user identification and ensuring communication, Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud,

Data Subject	Legal basis	Data category	Purpose of data processing
Ad-hoc User who mobilises charging case-by-case during the Electromobility service	4.3.	E-mail address	Performance of the agreement; Identification of the Data Subject and ensuring communication;
		Phone number	Performance of the agreement; Identification of the Data Subject and ensuring communication;
		The last four numbers of the Credit card number, the expiration date on the credit card and the name represented on the credit card	Performance of the agreement; Identification of the Data Subject and ensuring communication; Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Information used by the payment system, invoicing and settlement of the Service fee

Data Subject	Legal basis	Data category	Purpose of data processing
Contractual contact person indicated by the Partner or the details of contact persons supplied	4.4.	Name (first name, family name)	Performance of the agreement; Identification of the Data Subject and ensuring communication;
		Email address	Performance of the agreement; Identification of the Data Subject and ensuring communication;

Data Subject	Legal basis	Data category	Purpose of data processing
in the course of networking		Telephone number	Performance of the agreement; Identification of the Data Subject and ensuring communication;

Data Subject	Legal basis	Data category	Purpose of data processing
Corporate administrator indicated by the Corporate User and further contact persons on the Corporate User's discretion	4.1. 4.4.	Name (first name, family name)	Performance of the agreement; Identification of the Data Subjects and ensuring communication;
		Email address	Performance of the agreement; Identification of the Data Subjects and ensuring communication;
		Telephone number	Performance of the agreement; Identification of the Data Subjects and ensuring communication;

Data Subject	Legal basis	Data category	Purpose of data processing
Complainant, applicant	4.1. 4.3.	Name (first name, family name)	Carrying out and performing the complaint handling procedure Identification of the Data Subject and ensuring communication;
		Email address	Carrying out and performing the complaint handling procedure Identification of the Data Subject and ensuring communication;
		Telephone number	Carrying out and performing the complaint handling procedure Identification of the Data Subject and ensuring communication;
		Address	Carrying out and performing the complaint handling procedure Identification of the Data Subject and ensuring communication;

Data Subject	Legal basis	Data category	Purpose of data processing
Our applicants in the recruitment process	4.1.	Name (first name, family name)	Creation, amendment, performance of the legal relationship; employment; Identification of the applicant and ensuring communication; Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud;
		Email address	Creation, amendment, performance of the legal relationship; employment; Identification of the applicant and ensuring communication;

			Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud;
		Telephone number	Identification of the applicant and ensuring communication
		Other data provided voluntarily in the CV	Carrying out the professional selection procedure

Data Subject	Legal basis	Data category	Purpose of data processing
Employees, collaborators	4.2. 4.3.	Name (first name, family name), signature	Performance of the agreement; Meeting the legal obligations related to employment (e.g. registration)
		Email address	Performance of the agreement; Identification of the Data Subject and ensuring communication;
		Telephone number	Identification of the Data Subject and ensuring communication;
		Mother's name	Performance of the agreement;
		Place and date of birth	Meeting the legal obligations related to employment (e.g. registration)
		Address and mailing address	
		Tax ID number	
		SSN	
		Bank account number, bank identifiers	

**5.5. Data which may be supplied optionally by the Users**

5.5.1. The Data Controller shall be entitled to process the following User-related personal data that have been supplied by the User, but which are not necessary for registration:

Data Subject	Legal basis	Data category	Purpose of data processing
User registered in Parkl	4.1. 4.2. 4.5.	The last four digits of the bank card number, the bank card expiry date and the name of the bank card holder	Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Information used by the payment system, invoicing and settlement of the Service fee. If such data is not provided, the full use of the Parkl Application cannot be ensured.

	4.1.	GPS data	Operation and development, user identification, Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Supplying comfort services (street parking) If such data is not provided, the full use of the Parkl Application cannot be ensured either.
	4.1.	Forwarding of the license plate number by the partner	Operation and development, user identification, Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Supplying comfort services (instant parking) If such data is not provided, the full use of the Parkl Application cannot be ensured either.

- 5.5.2. The GPS is applied in the street parking function subject to the user's express consent, because such GPS data allows for identifying the user's position in order that the user can start the parking operation in the appropriate parking zone and we can supply a more comfortable service. GPS is always used for logistical purposes and is related strictly to the usability of the service, but the service may be used also without GPS. In this case, the user shall indicate manually the zone in which he intends to start the parking operation. We will not use GPS for tracking our users in any circumstances. It is important to emphasize that the Parkl application does not have a specific geolocation function and it cannot even determine the location of the given user, therefore it is unsuitable for monitoring. The GPS is always the GPS of the user's device the data of which may be used by the Parkl application based on the user's relevant decision and the GPS may be disabled or enabled through the phone at any time.
- 5.5.3. Instant parking is a special function that each user may enable through the application with a specific slide button. If the User wishes to use instant parking, after enabling such function, the Partners' barriers open automatically upon arrival of the vehicle. In this case, no GPS is applied, the function is operated through camera reading of the license plate number. The cameras are operated by the Data Controller at certain locations and by the partner in other locations. At the locations where the operator is the partner who actually carried out the parking activity, each partner shall comply with the related legal obligations (e.g. informing the data subjects). On the certain locations where the camera system is operated by Parkl, the Data Controller is obligated to inform properly the Data Subjects and to comply with the Data Protection policy. For this purpose, the Data Controller created the the document called "**The regulations of the electronic surveillance system**" which is accessible all the time on the Data Controller's Website. The instant parking function is available also within the Corporate package.
- 5.5.4. During the use of the Service, camera use is relevant only in respect of the license plate number provided by the User during the use of the instant parking service and – depending on the type of the camera - the shape of the vehicle. The Data Controller will not perform any other electronic monitoring activity which may be related to natural persons. Some of the cameras for the instant parking service are operated by the Partners, some by the Data Controller and the Data Controller – as a partly matter of the data processor's capacity – stores the licence plate numbers recorded by the cameras.

Scope of the data processed	Legal basis	Purpose of data processing	Period of data processing
-----------------------------	-------------	----------------------------	---------------------------



For the primary purpose of identify the license plate number of the user's car using the instant parking service and occasionally the vehicle's image that drives in the camera surveillance area. The cameras record the licence plate number and natural people – as a general rule - are not recognizable on the records. In case of natural people are recognizable on the records, the Data Controller stores these records encrypted.	4.4 The legal basis of the data process is the Data Controller's or third person's legitimate interest. In this matter the permission shall be given by conduct with the entering to the parking place.	Providing the comfort function for Users by creating an exhaustive service and the non-contact servcie through the availability of instant parking function , the continuous service development and the analysation of the records with the help of the artificial intelligence. Otherwise the storage of the licence plate numbers is necessary due to the investigation of the possible incoming complains.	Period of data processing is regulated in Section 6.2.
---	--	--	--

5.5.5. The result of the test for the legitimate interest

Considering the operation of the electronic surveillance system the Data Controller made the test for the legitimate interest. The result of the test is summarized below.

Analysing the certain necessity of the supplementation of the data processing cameras on the given areas considering whether there is an alternative option which can help to avoid the data procession.	The purpose of the data processing demands such technical measures which are able to identify a vehicle's licence plate number, so in this way it is capable and necessary reaches the Data Controller's legitimate ineterst. The licence plate numbers and occasionally the shape of the vehicles are recognisable on the records so the data processing is confined to such data which is absolutely necessary. The storage of the records is necessary to maintain and develop the service and to serv as proof in the complain-handling process.
The determination of the legitimate interest which makes the data processing necessary.	The legitimate interest is considered not just the Data Controller's interest because the solution of the non-contact, modern parking is the interest of the whole society. Furthermore, the Service's continuous updating and improving is not achievable without the continuous maintain and expansion of the service. The Data Controller's right to complain-handling is a legitimate interest which protects the consumer's legal interest and the Data Controller's right to find a possible proof.
The determination of the purpose of the data processing, the period of the record processing which is demanded by the Data Controller's legitimate interest	In the Data Contoroller's opinion, the period of the data processing is inevitable for making the corrections, expansions and to defeat the possible incoming complains

The identification of the Data Subject's legal interests and rights against the data processing	The Data Controller gives exhaustive and clear information for the Data Subjects about the processed personal data, the basis, method and period of the data processing, the Data Subject's rights in connection with the data processing and that the data are stored for only the necessary period of time and are accessible only for such people who needs them for their work.
The determination of why the Data Controller's legitimate interest is a proportionate restriction of the Data Subject's legitimate interest.	The restriction of the Data Subject's right of self-determination in connection with their personal data is not considered as an absolute, and unlimited right, so it is admissible in case of a necessary and proportionate data processing. The accessibility of the instant parking service as a comfort service is considered as a legitimate interest and the complain-handling can be interpreted as commonweal.

Based on the results of the test for the legitimate interest, it can be stated that the right of the Data Subject does not take precedence over the legitimate interest of the Data Controller, the data processing implements a necessary and proportionate restriction for the Data Subject.

- 5.5.6. If it is used under an individual agreement, private parking may be used only by a specific group of users who, however, do not provide additional data compared to any other users. Private parking is used through the instant parking function.

**5.6. Data which are collected by us automatically from the application, the payment system and the Website**

- 5.6.1. Service-related information collected automatically by the Data Controller, the collection of which information is necessary for the proper supply and further development of the Service:

Data Subject	Legal basis	Data category	Purpose of data processing
User registered in Parkl	4.1. 4.2.	Registration date	Maintenance and development of the application, Advertising, marketing activity
		Registration channel	Maintenance and development of the application, Advertising, marketing activity
		Data of the ongoing parking operation	Maintenance and development of the application, Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Advertising, marketing activity, Information used by the payment system, invoicing and of the service fee
		Number of parking operations	Maintenance and development of the application, Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Advertising, marketing activity, Information used by the payment system, invoicing and of the service fee
		Duration of parking operations	Maintenance and development of the application,

Data Subject	Legal basis	Data category	Purpose of data processing
			Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Advertising, marketing activity, Information used by the payment system, invoicing and of the service fee
		Amount payable per parking operation	Maintenance and development of the application, Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud, Advertising, marketing activity, Information used by the payment system, invoicing and of the service fee
		Payment method in case of Corporate users	Maintenance and development of the application, Creating and maintaining a reliable and safe environment, Information used by the payment system, invoicing and of the service fee
		Data viewed in the Parkl application or at the Website	Maintenance and development of the application, Advertising, marketing activity
		Logging data and device information	Maintenance and development of the application, Advertising, marketing activity
Users of the Website	4.1.	Data collected by Facebook pixel	Maintenance and development of the application
		Data collected by Google Tag Manager	Maintenance and development of the application
		Data collected by Hotjar	Maintenance and development of the application

#### 5.7. Data which we collect from third parties

5.7.1. User-related data collected by the Data Controller from third persons, the supply of which data shall be the User's responsibility; the Service Provider does not supervise and shall not be responsible for the collection and processing of such data by third persons and the transfer of such data to the Service Provider shall always be subject to authorisation by the User on such third persons' interfaces.

5.7.2. Third party services: if, during his registration or logging in the Application, the User avails of a third party service provider (for example, Facebook), the Service Provider shall be entitled to request the User's data necessary for the use of the Application from such third party service provider. Such data include the license plate number in case of instant parking, which number shall be transmitted by the specific parking partner to the Parkl System in order that the barrier opens automatically upon arrival of the car (see paragraph 5.4.3). The supply and change of such information shall be subject to the data protection settings of the third-party service provider.

#### 5.8. Cookies used by the Data Controller

5.8.1. If the User does not specifically supply any personal data or information, the Data Controller shall not collect or process any User-related personal data in a manner which would allow for identification of the User.

- 5.8.2. Cookies are short text files which are transmitted by the browser to the hard drive of the User's PC or the User's mobile device and which contain information about the User. Such data include the data of the PC or device from which the User logs in, data which are generated during the use of the website or application and which are recorded by the cookies used as automatic results of the technical processes. The automatically recorded data are logged automatically by the system, without User's specific statement or action, upon visiting the website or application, as well as upon leaving such website or application.
- 5.8.3. By using Parkl, each User gives his consent to the Data Controller using session cookies that, based on the Data Controller's decision, are really necessary in relation to the website or the application, provided that using such session cookies is essential for visitors to browse the website or application and to use the functions thereof, e.g. memorizing the operations carried out by the visitor on given pages during the visit. Such cookies are valid only for the duration of the visitor's actual visit and they are removed from the PC automatically upon completion of the work session and closing of the browser.
- 5.8.4. The Data Controller uses only cookies that are processed by external service providers (e.g. Google).
- 5.8.5. The Data Controller's advertisements are displayed by external service providers (Google, Facebook) on Internet sites. By means of the cookies, such external service providers (Google, Facebook) store the data according to which the User has visited the Data Controller's website or Application previously and based on that data, they display the advertisements to the User in a tailor-made manner (that is, they carry out remarketing activities).
- 5.8.6. The data processing carried out by the abovementioned external service providers shall be subject to the data protection requirements set by such service providers and the Data Controller shall not assume any liability for such data processing.
- 5.8.7. Use of the abovementioned technologies: the data collected by means of the abovementioned technologies shall not be used to identify the User and the Data Controller shall not link such data with any other data that is suitable for identification.
- 5.8.8. The use of such data is aimed primarily at allowing the Data Controller to use the application properly; such proper use requires in particular monitoring of the visitors' data and the filtering out of any abuse in relation to the use.
- In addition to the above, the Data Controller may use such information for the purpose of analysing usage trends, as well as to improve and develop the functions of the website or of the application and to obtain global traffic data about their use. The Data Controller may use the information so obtained to create or analyse usage statistics, as well as to transfer such statistical data that are not suitable for identification (e.g. number of visitors, the most viewed topics and contents) to third persons or to publish them in an aggregated and anonymized form.
- 5.8.9. **Option to disable cookies:** if the User does not want the Data Controller to collect the abovementioned information about him in connection with the use of the website or application, he may **disable the use of cookies either partially or fully** in the settings of the Internet browsers or he may otherwise change the settings of cookie messages, acknowledging that this may render more difficult the use of the application.

## 6. How and until when we use the data collected by us?

- 6.1. The Data Controller may process only personal data that is essential for achieving the purpose of data processing, is suitable for achieving such purpose and to the extent and for the time necessary for the achievement of such purpose.
- 6.2. In the absence of a statutory obligation to do so, the Data Controller shall not publish, compile or link the personal data available to it.

Purpose of data processing	Motivation of the purpose	Period of data processing
Conclusion, amendment, performance of the agreement	The Data Controller will use the data collected by it or through a third-party service provider for the purposes of concluding, amending and performing the following Agreement. The personal data	The Data Controller processes the User-related data during the contractual relationship and after such relationship until

Purpose of data processing	Motivation of the purpose	Period of data processing
	obtained during the use of the Service facilitate or make possible the transaction required by the User. The Data Controller uses the User's personal data in order to allow for creating the contractual background for ordering of the service by the user and for promoting the performance of the agreement.	when the User requests the erasure of such data by sending an email to <a href="mailto:support@parkl.net">support@parkl.net</a> , except for the data processed by Facebook pixel, Google Tag Manager and Hotjar, as such data will always be erased 1 year following their collection.
Maintenance and development of the Application and of the Service	The Data Controller will use the data collected by it or through a third-party service provider for the following purposes of maintaining and developing the Service. The personal data obtained during the use of the Service facilitate or update the transaction required by the User through the Application. The Data Controller uses the User's personal data in order to allow for the continuous improvement and development of the Application for the User.	For the sake of evidencing in case of a dispute, the data of the User concerned are processed within the general prescription period (5 years) or for 5 years following the final settlement of a legal dispute or for 10 years following erasure provided in the Data Protection Act where relevant (Section 25/F(4) of the Data Protection Act).
Operation and development, user identification and ensuring communication	The Data Controller may use the User's personal data in order to supply the Service effectively, to carry out analyses, as well as to assess User satisfaction using the contact details provided by the User. In this context, the Data Controller may perform the following activities: access to and use of the Application, providing for its operation, safety, repair, development and optimisation, sending support, update and security related information.	
Creating and maintaining a reliable and safe environment, enforcement of claims and rights, preventing and remedying fraud	The Data Controller may use the User's personal data also for ensuring the Users' lawful interest during the use of the Service, as well as in order to comply with the provisions of the T&Cs accepted expressly by the User and the applicable laws. In this context, the Data Controller may perform the following activities: preventing and terminating fraud, spam, abuse and other harmful activities, safety checks and risk assessment, checking and verifying the data supplied by the user.	
Advertising, marketing activity	The Data Controller may use the User's personal data only for data processing in relation to the following advertising and marketing activities: promotional messages, advertisements, newsletters, sending other information promoting the Service either through the Application or via email, advertisements displayed based on the individual search preferences, advertisements displayed through the Parkl Application or the Website, as well as through the Facebook and	The User may seek to unsubscribe from the advertisements via <a href="mailto:support@parkl.net">support@parkl.net</a> or in the profile settings, or directly in case of newsletters by clicking on the relevant part in the newsletter or in the settings menu of the application. In the absence of that, the Data

Purpose of data processing	Motivation of the purpose	Period of data processing
	Instagram account, displaying prize games, surveys, promotional activities and events sponsored by the Data Controller or its Partners.	Controller shall store such data for not more than 5 years.
Information used by the payment system, invoicing and of the service fee	The Data Controller uses the SimplePay Online Payment System for the transactions carried out through the Application; such system works in case of the Service Providers using the Service as follows and the Data Controller may perform the following activities based on the bank card data provided: by providing the bank card data, the Service Provider authorises access to and use of the payment services. The Service Provider shall not be liable for the further functioning of the SimplePay Online Payment System and shall not process the data contained therein, as well as it shall have no influence over such system's operation and privacy settings.	The Data Controller processes the User-related data during the contractual relationship and after such relationship until when the User requests the erasure of such data by sending an email to <a href="mailto:support@parkl.net">support@parkl.net</a> . For the sake of evidencing in case of a dispute, the data of the User concerned are processed within the general prescription period (5 years) or for the period set out by the applicable law (8 years), or for 5 years following the final settlement of a legal dispute or for 10 years following erasure provided in the Data Protection Act where relevant (Section 25/F(4) of the Data Protection Act).
Carrying out the complaint handling procedure	Verifiability and documentation of the process and the effective control.	The Data Controller processes the data until when the purpose of data processing exists, or it shall erase such data if their further processing is unnecessary for achieving the purpose of data processing. According to the consumer protection rules, the Data Controller shall retain the data for 5 years, or for 10 years following erasure provided in the Data Protection Act where relevant (Section 25/F(4) of the Data Protection Act).
Meeting the legal obligations related to employment (e.g. registration)	Performing the relevant statutory notification, data supply, taxation, contribution payment, etc. related obligations	The Data Controller shall retain the data for 5 years following the end of the calendar year in which the relevant person quits, provided that the labour, salary and social security contribution registers shall not

Purpose of data processing	Motivation of the purpose	Period of data processing
		be disposed of. Otherwise, the labour law claims prescribe after 3 years.
Providing the comfort function for Users through the availability of the instant parking function	The Service Provider needs to handle only the camera records, so the license plate numbers because the Service Provider intends to make available, develop the Service continuously. The Service Provider's aim is to reach a higher level of punctuality with the help of an artificial intelligence that uses machine learning during the reading and to enable the Service Provider to check the license plate numbers during the complaint-handling process.	The Data Controller processes the data until when the purpose of data processing exists, or it shall erase such data if their further processing is unnecessary for achieving the purpose of data processing. According to the consumer protection rules, the Data Controller shall retain the camera records about the license plate numbers for 30 days.

#### 7. Who may know the processed data (data transfer)?

- 7.1. For the smooth supply of the Service, we may be required to transfer certain data to third parties, of which we shall always inform the Data Subjects under this section. According to the applicable law, the Data Controller and its employees and collaborators shall be entitled to know the personal data.
- 7.2. The Data Controller may transfer the User's personal data within the company in order to ensure the proper supply of the Service and for quality assurance reasons, as well as to the contracted Parkl Partners for the purpose of investigating any customer complaints. By accepting this Policy expressly, the User consents to such data transfer.
- 7.3. In case of data transfer, the Data Controller shall keep a register on data transfers, containing the time when the personal data processed by it were transferred, the legal bases and recipients of the data transfer, the scope of the personal data transferred, as well as other data set out in the law providing for data processing.
- 7.4. Data may be transferred in the following cases:

Recipient of the Data Transferred	Scope of the data which may be transferred
Sharing data with Parkl's Partners	In case of using the Service, the Data Controller shall transfer the personal data that are essential for the use of the Service, to its contracted Parkl Partners. Such data are the following: license plate number.
Sharing data with employees	The personal data listed in the above section 5 may be accessed by the Service Provider, including the Service Provider's employee, but only where the processing of such data is essential in order to achieve the data processing purpose corresponding to the relevant data group.
Sharing with the SimplePay Online Payment System	The Service fee shall be settled through the SimplePay Online Payment System operated by OTP Mobil Kft.; the User shall register his bank card data directly in the SimplePay System and the Data Controller may access only the following data: the last four digits of the bank card number, the bank card expiry date and the name of the bank card holder.  In the SimplePay Online Payment System, the raw card data are not actually saved either by the Data Controller or on the SimplePay servers. A so-called TOKEN identifies the saved card which is returned by the

Recipient of the Data Transferred	Scope of the data which may be transferred
	SimplePay system to the Data Controller in an IPN message. The bank card data are processed in accordance with the card security policies. Neither the Data Controller, nor SimplePay shall have access to the bank card data. The service shall accordingly be governed by SimplePay's data protection policy.
Electronic invoicing system	In using the Service, electronic invoicing may be requested, which electronic invoicing is carried out through the <a href="http://www.szamlazz.hu">www.szamlazz.hu</a> system operated by KBOSS.hu Kft. which is accordingly governed by the data protection policy of szamlazz.hu.
Magex Solutions Kft.	To our partner who carries out system operation and supplies server service
Venilia Vellum Kft. Company reg. No: 01-09-566797	To our partner who carries out bookkeeping services (employee, collaborator and invoicing related data)
Socially Kft. Company reg. No: 01-09-188393	To the partner carrying out marketing activities (username, the accessible content of the social media user account)
National Mobile Payment Plc. Company reg. No: 01-10-047569	Only in case of street parking, transferring only the license plate number to National Mobile Payment Plc. as Partner
Swarco Traffic Hungaria Kft. Company reg. No: 01-09-070703	The Data Controller contracted certain partners in collaboration with Swarco; under such agreement, the hardware shall be supplied by Swarco, whilst the Parkl System shall be supplied by Parkl, so also Swarco will have access to the license plate numbers read by the camera.
Information which may be displayed publicly	The Data Controller publishes only the information to the publication of which the Data Subject gives his consent and such information may be displayed by the Data Controller also on its Partners' community/public platforms. Such data may include the following: opinions written in comments at the place of Application download or in other public community fora.
Compliance with the laws	With the exception provided in this section 7, the Data Controller shall not transfer the personal data supplied to it to third parties, save for the case where an authority, state or administrative body or court requests the Data Controller to do so based on a statutory obligation and where the Data Controller shall not be entitled to refuse such request under the applicable laws.
Customers entering into a contract with the Data Controller under the Corporate Terms and Conditions	The Data Controller may transfer data to the Corporate User specified in the Corporate Terms and Conditions where a detailed list is requested about the locations and time intervals in which the Individually Listed



Recipient of the Data Transferred	Scope of the data which may be transferred
	Users related to a given Corporate User availed of the Data Controller's service.

7.5. The Data Controller shall never be liable for the data processing carried out by third-party service providers (e.g. Google, Facebook, Partner, OTP SimplePay, etc.); such data processing shall always be subject to the data protection policies of the relevant service provider.

7.6. For the smooth supply of the Service, the Service Provider involves various third-party service providers in the supply of the Service. Such service providers are as follows:

Hosting service provider	Name: Microsoft Ireland Operations Limited Hosting service provider's address: Block B, Sandyford Industrial Estate, Atrium Building, Carmanhall Rd, Sandyford, Dublin 18, Ireland Hosting service provider's phone number: +353 1850 940 940 Hosting service provider's email address: info@microsoft.com Hosting service provider's website: www.microsoft.com
The company operating the system and being contracted by the Data Controller	Name: MAGEX Solutions Kft. Registered seat: H-8800 Nagykanizsa, Órtorony utca 35/B Company registration number: 20-09-076039 Tax number: 13630126-2-20 Represented by: Lovas, Attila

7.7. The Data Processor stores the personal data supplied to it by the Data Controller during its activity. The Data Controller expressly records that it shall not be liable either directly or indirectly for the data processing carried out by and the data security of Microsoft Ireland Operations Limited as service provider; such data processing and data security shall only be governed by the Data Processor's data processing guidelines and policies.

7.8. The Data Controller reserves the right to involve further data processors in the future data processing activities, of which it informs the Users by amending this Policy.

The Users' personal data shall in no other cases be processed by persons other than the Data Controller.

## 8. User's Rights and Obligations

### 8.1. Processing of data concerning the User

8.1.1. The Data Subject shall be entitled to access the data collected about him, as well as to exercise such right simply and with reasonable frequency in order to establish and check the lawfulness of data processing. The Data Controller seeks the accuracy and actuality of the personal data, but the Data Subject shall indicate the change of such data to the Service Provider via the following email address: [info@parkl.net](mailto:info@parkl.net). The Data Subject shall be liable for keeping the personal data updated.

8.1.2. The Data Controller shall take appropriate measures in order to provide the Data Subject with all information concerning the processing of personal data in a transparent, readable and easily accessible format, formulated clearly and in an understandable manner. Upon request, the Data Controller shall supply the information primarily electronically via [info@parkl.net](mailto:info@parkl.net) email address or orally, over +36309719900 phone number; such information may also be requested personally at the Data Controller's registered seat. The Data Subject shall always verify his identity in order to receive such information.

8.1.3. The Data Controller shall inform the Data Subject about the measure taken in reply to his request, without delay, but in any case within one month from receipt of such request. Such deadline may be extended by additional two months where it is necessary having regard to the complexity of the request and the number of requests. The Data Controller shall inform the Data Subject about the extension of the deadline, indicating the reasons of the delay within one month from receipt of the request.

8.1.4. Should the Data Controller fail to take any measures in reply to the Data Subject's request, it shall inform the Data Subject about the reasons of not taking any measures, as well as of his right to file a complaint with the

supervisory authority and to seek judicial remedy, without delay, but in any case within one month from receipt of such request.

8.1.5. The Data Controller shall ensure such right to the Data Subject free of charge if, however, the request is not founded or is exaggerated, for example because it is repeated several times, the Data Controller may refuse to take any measures or it may charge a fee considering the administrative costs resulting from the supply of the information requested or from taking the measure sought.

8.1.6. If the Data Controller processes a significant amount of information in relation to the Data Subject, it may request the Data Subject to precise, before the disclosure of information, which information or data processing activities are covered by his request.

## 8.2. Access

8.2.1. The Data Controller shall take all reasonable measures in order to establish the identity of the data subject seeking access, in particular in connection with online services and online identifiers. The Data Controller shall not retain the personal data for the purposes of being able to answer potential requests.

## 8.3. Data rectification and erasure

8.3.1. The Data Subject shall be entitled to request rectification of his personal data and he shall have the “right to be forgotten” if retaining the relevant data would infringe the legal provisions.

8.3.2. The Data Subject shall be entitled to request his personal data to be erased and not be processed any longer, if collection or other processing of his personal data is not necessary anymore for the original purposes of data processing.

## 8.4. Withdrawal of the consent and restriction of the processing

8.4.1. The Data Subject shall be entitled to withdraw his consent previously given for the processing of his personal data. This right is relevant in particular where the Data Subject was a child when he gave his consent and, therefore he was not fully aware of the risks of data processing, and subsequently he seeks to remove the said personal data especially from the Internet. The Data Subject shall be entitled to exercise this right even if he is not a child anymore.

8.4.2. However, storage of such personal data shall be deemed lawful if it is necessary for protecting the exercise of the right to freedom of opinion and information, compliance with a legal obligation or performance of a task in the public interest, etc.

## 8.5. Right to Exception/Right to Object

8.5.1. The Data Subject shall have the right to object to the processing of data concerning his situation if the personal data may be processed lawfully, because the data processing is necessary in the public interest or in order to perform a task exercising the public power granted to the Data Controller or based on the Data Controller's or third party's lawful interests.

## 8.6. Right to data portability

8.6.1. The Data Subject shall have the right to object to the processing of data concerning his situation if the personal data may be processed lawfully, because the data processing is necessary in the public interest or in order to perform a task exercising the public power granted to the Data Controller or based on the Data Controller's or third party's lawful interests.

## 8.7. User's obligation

8.7.1. The User may supply only his own personal data during the use of the service and he makes a statement under the penalty of perjury in relation to the quality, that is the lawfulness, truth and correctness of such data. Should he supply data other than his personal data, the disclosing party shall obtain the Data Subject's consent. If the Data Controller has any doubt about the quality of the data sought, it may request their verification by the User in accordance with the T&Cs. Should the User not want to satisfy such request or the Data Controller itself finds such data not to be lawful, true and correct, the User's data shall not be processed anymore and the Data Controller shall be entitled not to supply the service, that is it may disable the User without delay and without any further warning or detailed motivation until remedying the breach of contract if it can be remedied or, delete the User if such breach of contract cannot be remedied, or apply any legal consequence set out in the T&Cs, the CT&Cs or other applicable agreement or law for the breach of contract.

8.7.2. The Data Controller shall not be liable, either directly or indirectly, for any legal consequences resulting from the fact that the User does not supply his personal data or that such data are not true, even where it requested data verification due to its doubt.

8.8. The Data Subject acknowledges that if he seeks the exercise of his rights set out in paragraphs 8.3 to 8.6, the achievement of the data processing purposes may be hindered which may lead to the failed performance of the Service. Furthermore, the personal data shall not be erased where the Data Controller shall comply with its legal obligation in relation to the retention and storage of the given data. The Data Controller shall always inform the Data Subject giving the reasons if granting the Data Subject's request is hindered.

## 9. Automated Decision-making, Profiling

9.1. The Data Controller carries out automated decision-making in applying the following functions:

	<b>Operation of the automated decision-making</b>	<b>Technology</b>	<b>Purpose, grounds</b>
<b>Instant parking</b>	Based on the Data Subject's specific choice, it allows for the User not to be obliged to open the barrier by pushing a button over the phone or through the application when he parks in the parking lot separated with a barrier or when he leaves such parking lot, and the barrier opens automatically with the help of the cameras that identify the vehicle when it arrives, therefore the parking period begins automatically.	By means of the license plate number reading cameras installed to the barriers.	Technological support and continuous development for the Data Subject's comfort and his parking operations in order that the Data Subject be able to park more easily, quickly and practically. The system can work even more accurate and the records are available in the complain-handling process.
<b>Street parking</b>	Based on the User's specific choice, the relevant parking zone can be displayed automatically on the map so that the user may start the parking operation by pushing a button instead of searching the zone based on which he shall start the parking period. This function in itself does not have any specific consequence for the user, except where he begins parking specifically following the identification of the location. The parking operation will not start automatically.	The built-in phone GPS	Technological support for the user's comfort and his parking operations in order that the user be able to park more easily, quickly and practically.

The abovementioned functions will be applied only if the User enables them specifically in his user account or he may also disable for them in all case upon his own discretion. In this latter case, the automated decision-making in connection with the determination of the GPS location will not be applied anymore in respect of the User however, in order to maintain the instant parking service, all the license plate numbers of the arrival vehicles shall be identify by cameras in consequence of the service's nature. If, according to the User, the barrier was opened erroneously or it was not opened

or the Parkl identified the zone erroneously the User may start or set up the parking operation even manually or through the Parkl support. Based on the above, we always ensure the right to request human intervention through Parkl support, as well as, the right to object to a decision in accordance with our related complaint handling procedures. The User shall not be subject to discrimination or any legal disadvantage due to automated decision-making, such form of decision-making does not significantly affect him either individually or as a group and it is always subject to his consent. The use of the data collected is always limited to the direct purpose, such data shall not be used for other purposes (e.g. marketing) and may be stored only until when this is necessary for the contractual and complaint-free performance of the specific parking operation.

9.2. The following our considered to be important by us for the User to give an informed consent:

Function	Personal data concerned	Data use	Consequence of use
<b>Instant parking</b>	License plate number (based on which the location of the user's vehicle may be deducted)	The barrier is opened without pushing any button as soon as the vehicle arrives, and it reads the license plate number, therefore the parking period begins. The data will be utilized in order to maintain and develop the service and to create a more accurate service by analysing these data. Furthermore, this data is necessary in the complain-handling process. The Partner operating the parking lot informs us about the license plate number through data transfer.	The parking service operation begins, the Parking period starts which arises a payment obligation.
<b>Street parking</b>	GPS data relating to the User's location	In order to begin street parking, the map indicates where the User parked his car and it identifies the appropriate parking zone so that the User can begin the appropriate parking operation. The state partner becomes aware of the license plate number and the applicable parking zone, but the GPS data.	The parking operation begins and the payment obligation arises upon pushing a specific button. In case of inaccurate GPS data, starting the parking period in a wrong parking zone may entail a parking fine. The GPS shall always operate independently from the Parkl Application and it can be found in the User's phone.

9.3. We do not carry out profiling, e.g. individual examination of the parking habits and making deduction in respect of the individual.

## 10. Further important information

### 10.1. Registration of the data processing activities

The Data Controller complies with its obligation to register the data processing activities and keeps the data processing register which is relevant for its employment activity.

### 10.2. Data protection officer

According to our opinion, the Service Provider shall not meet the obligation to appoint a data protection officer having regard to the fact that the Data Controller's main scope of activities does not involve data processing operations which allow for significant, regular and systematic monitoring of the Data Subjects, and during its activities, the Data Controller does not process special categories of personal data or data relating to crimes or having criminal law relevance.

### 10.3. Supervisory and other authorities

The territorial scope of this Data Protection Policy also extends to further foreign authorities if the User is concerned in relation to a registered seat or place of activity outside Hungary.

### 10.4. Processing of sensitive data

The Data Controller declares that it does not process any data which are particularly sensitive personal data from the aspect of fundamental rights and freedoms and by their nature and which require specific protection as the circumstances of their processing are characterised by a significant risk. If the Data Controller were to process such particularly sensitive data, it shall act with particular attention in this regard and shall process such data only to the necessary extent.

The Data Controller declares that it does not process any data that is personal data referring to race or ethnic origin, political opinion, religious or philosophical belief or trade union membership, as well as genetic or biometric data aimed at the identification of specific natural persons; furthermore, it does not process healthcare data, as well as personal data relating to the natural persons' sexual life or orientation.

## 11. Personal Data Breach

11.1. In case of a personal data breach, we notify such breach to the supervisory authority in accordance with the laws, within 72 hours from becoming aware thereof and we keep also a register of the personal data breaches. In the cases specified by the law, we inform also the users concerned about that breach.

11.2. If the Data Subject perceives that there is a threat of personal data breach, we request him to notify such threat to the Data Controller by filling in the Personal Data Breach Notification Sheet included in the Personal Data Breach handling policy attached as Annex No 2 to this Policy. The detailed regulation of our procedure to be followed in case of a personal data breach is set out in our Personal Data Breach handling policy.

## 12. Complaint Handling, The Competent Supervisory Authority

12.1. The Data Subject may submit any requests or complaints in relation to our processing of personal data at any of the following addresses: personally: H-1051 Budapest, Arany János utca 15. 1. em. 6. ajtó, phone: (+36) 30 971-99-00, mailing address: H-1051 Budapest, Arany János utca 15. 1. em. 6. ajtó or via email to [info@parkl.net](mailto:info@parkl.net). The Request and complaint handling policy is attached as Annex No 1 to this Policy and details our procedure to be followed in case of submitting a complaint and it also contains a Written Complaint Notification Sheet which shall be returned completed by the Data Subject via post or in email to the Data Controller.

12.2. In case of an infringement of any rights in relation to Parkl's data processing, the Data Subject shall be entitled to submit a complaint to the competent supervisory authority. Having regard to the fact that the Data Controller's registered seat is in Hungary, the national supervisory authority competent in relation to the processing of the personal data regulated under this Data Protection Policy is:

Hungarian National Data Protection and Freedom of Information Authority

Website: <http://naih.hu>

Mailing address: H-1530 Budapest, Pf.: 5.

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Phone number: +36(1)391-1400

12.3. In addition to the above, a claim may be brought before the Budapest Regional Court against Parkl where the protection of the personal data is violated.

**13. Amendment of the Data Protection Policy**

13.1. The Service Provider reserves the right to amend this Data Protection Policy at any time. Any amendments shall be published at <https://parkl.net/policy> without delay.

13.2. In case of amendment, a notice shall be sent via email to the Data Subject within not less than 30 (thirty) days before the entering into force of such amendment.

13.3. Should the Data Subject disagree with the amendment, he may raise an objection and notify it via email to [info@parkl.net](mailto:info@parkl.net), as well as request the erasure of his data.