

**Privacy Notice**  
**on the data processing operations of the**  
**ELECTROMOBILITY SERVICE-RELATED customer service (“Customer Service”) of TIFON d.o.o. (“Company”)**

Description and purpose of data processing	Legal basis for data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of the data transfer	Processors and their processing activities
<p><b>I. Electronic conclusion of contracts, use of the service, provision of electrical vehicle charging infrastructure via application, invoicing and communication</b></p>	<p>Article 6 (1) b) of the GDPR – performance of the contract</p> <p>In case of a registered user, the profile picture and other optional data shall only be processed by the Company with the express voluntary consent of the user pursuant to Article 6 (1) a) of the GDPR.</p>	<p><b>Required information for unregistered (ad hoc) users:</b>  email address, <u>name provided for invoicing</u>, address, tax number, <u>credit card information</u>: credit card name, credit card number, expiration date, CVC/CVV code.</p> <p><b>Optional data:</b>  Last name, first name, phone number</p> <p><b>Compulsory information</b> provided by the registered users:  last name, first name, email address, password, <u>name provided for invoicing</u>, address, tax number, <u>credit card information</u>: credit card name, credit card</p>	<p><b>The data is stored for 30 days</b> following the termination of the service contract based on the electronic conclusion of the contract, the use of the service and the provision of service and, in the case of the data processed in connection with the communication, <b>for 30 days</b> from the termination of the service contract.</p> <p>The data will be stored for <b>30 days</b> from the termination of the contract.</p> <p>Invoicing data: Controller shall retain the electronic invoices issued in relation to the service for 11 years</p>	<p><b>By using internal roaming service of MOL Group</b>, the personal data for internal pay-off and invoicing will be transferred among the MOL-group companies (between the charging point operator CPO) and the e-mobility service provider (EMSP). In this case, the invoicing is performed by the MOL Group's company of the country of given charging point. Regarding the data processing above, the <b>members of the MOL Group are considered as joint data controller.</b></p> <p>The following countries &amp; MOL-Group companies</p>	<p><b>Driivz Ltd.</b> – provision of ancillary services related to data processing in the course of electromobility services, operation of telephone applications, server services (registered office: Izrael, Hod Hasharon, HaHarash u. 4.)</p> <p><b>MOL GBS Magyarország Kft.</b> – invoicing (registered office: 1039 Budapest, Szent István utca 14.)</p>

		<p>number, expiration date, CVC/CVV code.</p> <p><b>Optional data:</b> sex, data of the user's vehicle: manufacturer, the make and year of manufacture of the vehicle, maximum charging power, battery capacity, consumption data, phone number, profile picture fuel consumption data, phone number, profile picture</p>	<p>in accordance with the Article 10 of the Accounting Act (OG 78/2015, 134/2015, 120/2016, 116/2018, 42/2020, 47/2020)</p> <p>In case of e-roaming, the data related to the invoicing are stored according to the tax &amp; accounting rules of the given country of MOL group's company.</p>	<p>are involved in internal roaming:</p> <p><b>CZ:</b> MOL Česká republika, s.r.o. společnost s ručením omezeným Purkyňova 2121/3 11000 Praha 1</p> <p><b>SLO:</b> MOL Slovenija, trgovsko podjetje d.o.o. Družba z omejeno odgovornostjo Lendavska ulica 24 9000 Murska Sobota</p> <p><b>RO:</b> MOL Romania Petroleum Products SRL Societa cu raspundere limitata Bd. 21 Decembrie 1989 77, et. 1 cam.C.1.1 400604 Cluj-Napoca</p> <p><b>SK:</b> SLOVNAFT a.s. akciová spoločnosť Vlčie hrdlo 1 82412 Bratislava</p>	
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<p><b>II. Direct marketing, surveys, customer satisfaction</b></p> <p>The provision of a questionnaire regarding electronic newsletters, advertisements, direct marketing or other marketing content, satisfaction with the service, provided that the User expressed its consent.</p>	<p>Article 6 (1) a) of the GDPR – voluntary consent by the data subject</p>	<p>First name, last name, email address if provided by the user: sex, phone number</p>	<p>The data will be stored for <b>30 days</b> from the termination of the contract and it will be deleted immediately after withdrawal of consent.</p>	<p><b>MULTICOM Contact Kft</b>  1121 Budapest,  Zsigmondy Vilmos utca  8/b (providing customer service in the following countries: <b>SLO, RO, SK, CZ, HR</b></p> <p><b>Pendant Távfelügyeleti és Mérő-ellenőrző Szolgáltató Kft.</b> performs the customer service tasks and is responsible for the direct communication with customers in Hungary</p>	

<p><b>III. Developing and expanding the Service based on a summary of statistical data</b></p> <p>The purpose of the Controller is to increase the quality of the Service on the basis of data voluntarily provided by and subject to the User's explicit consent.</p>	<p>Article 6 (1) a) of the GDPR – voluntary consent by the data subject</p>	<p>If the user has recorded this information in its user account: user's vehicle type, manufacturer and year of manufacture of the vehicle, maximum charging power, battery capacity and consumption data</p>	<p>The data will be stored for <b>30 days</b> from the termination of the contract and it will be deleted immediately after withdrawal of consent.</p>		<p><b>Drivz Ltd.</b> – provision of ancillary services related to data processing in the course of electromobility services, operation of telephone applications, server services (registered office: Izrael, Hod Hasharon, HaHarash u. 4.)</p>
<p><b>IV. Feedback on the Service</b></p> <p>In case of Users who have expressly consented to and voluntarily provided their telephone number or e-mail address, the Controller will make a request regarding the Service when there is a negative feedback by the Users. Regarding the data processing above, the <b>members of the MOL Group are considered as joint data controller.</b></p>	<p>Article 6(1)(f) of the GDPR – legitimate interest of the controller</p> <p>The controller's legitimate interest: More effective handling of feedbacks and complaints and ensuring that the necessary information is available where a case cannot be resolved immediately. Increasing the customer satisfaction, thereby retaining customers and gaining new customers.</p>	<p>User name, first name, last name, phone number, e-mail address, content and data of reactions</p>	<p>The data will be stored for <b>30 days</b> from the termination of the contract.</p>		<p><b>MULTICOM Contact Kft</b> 1121 Budapest, Zsigmondy Vilmos utca 8/b) – customer service in the following countries: SLO, RO, SK, CZ, HR</p> <p><b>Pendant Távfelügyeleti és Mérő-ellenőrző Szolgáltató Kft.</b> – customer service administration and complaints handling and performs the customer service tasks; responsible for the direct communication with customers in Hungary (registered office: 1045</p>

	Improving processes through feedback.				Budapest Istvántelki út 8.  <b>Pendant</b> may act as data processor only if the MOL Plugee's registered user calls/send e-mail directly to this customer service of charge point operator in Hungary or if the data transfer and processing between the MULTICOM and Pendant as two customer services are necessary in connection with the feedback on the service for the registered User charging in Hungary.
<b>V. Recording of telephone conversations with the Company's Customer Service</b>  Regarding the data processing above, the <b>members of the MOL Group are considered as joint data controller.</b>	Article 6(1)(f) of the GDPR – legitimate interest of the controller  The controller's legitimate interest: More effective handling of reports and complaints and ensuring that the necessary information is available where a case cannot be resolved	The voice recordings of calls received and initiated through the Customer Service call centre. The recordings contain the voices of Customers, data subjects not qualifying as customers ("Customer") and the Customer Service employees.	The Company retains the voice recording and the related personal data for <b>5 years</b> pursuant to Article 223 of the Civil Obligations Act (OG: 35/2005, 41/2008, 125/2011, 78/2015, 29/2018) with regard to the exercise of any potential civil law claims of the Company or to defend against		<b>MULTICOM Contact Kft</b> 1121 Budapest, Zsigmondy Vilmos utca 8/b) – customer service in the following countries: SLO, RO, SK, CZ, HR  <b>Pendant Távfelügyeleti és Mérő-ellenőrző Szolgáltató Kft.</b> – customer service administration and complaints handling and

	immediately.	In the case of complaints or reports submitted, the data recorded also include the data subject's last name, first name, address, telephone number, email address, the data contained in the complaint or report, the data necessary for the payment of potential indemnification (bank account number), vehicle-related data in the case of vehicle damage, in particular the make and year of manufacture of the vehicle, the location and time of e-charging, the identifier and type of the charger used and the type of the charging socket used.	any potential civil law claims of the data subjects.		performs the customer service tasks; responsible for the direct communication with customers in Hungary. (registered office: 1045 Budapest Istvántelki út 8.)  <b>Pandant</b> may act as data processor only if the MOL Plugee's registered user calls/send e-mail directly to this customer service of charge point operator in Hungary or if the data transfer and processing between the MULTICOM and Pandant as two customer services are necessary in connection with the feedback on the service for the registered User charging in Hungary.
<b>VI. Handling of and responding to consumer complaints</b> lodged in	Article 6(1)(f) of the GDPR – legitimate interest of the	The data subject's user name, last name, first name, address, telephone	The Company shall retain the report on the complaint and the copy of	In case of official request from the Consumer Protection	

<p>writing, via an electronic interface, over the phone or in person and the management of reports and complaints concerning the service</p>	<p>controller</p> <p>The controller's legitimate interest: More effective handling of reports and complaints and ensuring that the necessary information is available where a case cannot be resolved immediately.</p> <p><b>Additional legal basis for data storage: Article 6 (1 c)</b> of the GDPR - processing is necessary for compliance with a legal obligation to which the controller is subject;</p> <p>pursuant to Article 10 of the Consumer Protection Act (OG 41/2014, 110/2015, 14/2019) the Company shall investigate the complaints of data subjects qualifying as consumers, and if the consumer does not agree with the handling of their complaint or if the complaint cannot be</p>	<p>number and email address, the data contained in the complaint or report, the data needed for the payment of potential indemnification (bank account number), vehicle-related data in the case of vehicle damage, in particular the make and year of manufacture of the vehicle, the location and time of e-charging, the identifier and type of the charger used and the type of the charging socket used.</p> <p>In addition, the report drawn up on the (consumer) complaint contains the place, time and manner of lodging the complaint, the detailed description of the consumer's complaint, a register of the documents and other evidence presented by the consumer, the Company's statement on</p>	<p>the Company's response to the complaint for <b>1 year</b> according to Article 10 of the Consumer Protection Act (OG 41/2014, 110/2015, 14/2019) and present these at the request of the supervisory authority.</p> <p>If the customer service of the CPO handling the complaint abroad, the domestic consumer protection act and related regulations of the given country shall prevail. The ad-hoc user receives information from the customer service of the CPO (MOL group's company where the charger located).</p>	<p>Authority or other competent authorities</p>	<p><b>MULTICOM Contact Kft</b> 1121 Budapest, Zsigmondy Vilmos utca 8/b) – customer service in the following countries: SLO, RO, SK, CZ, HR</p> <p><b>Plan-net d.o.o.</b> Kamnik pod Krimom 8b, 1352 Preserje, Slovenia, +386 1 363 31 30, e-mail: info@plan-net.si</p> <p><b>Pendant Távfelügyeleti és Mérő-ellenőrző Szolgáltató Kft.</b> – customer service administration and complaints handling in Hungary (registered office: 1045 Budapest Istvántelki út 8</p> <p><b>MOL IT &amp; Digital GBS Kft.</b> is responsible for storing feedback that is classified as a complaint conducted</p> <p><b>Pendant</b> can be Data Processor only if the MOL Plugee registered user calls/send e-mail directly</p>
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	<p>immediately investigated, the Company shall draw up a report on the complaint and its position on the complaint without delay and hand over or send – depending on the nature of the complaint – a copy thereof to the consumer.</p> <p>If the Customer uses an e-mobility service from a company belonging to MOL Group abroad,</p> <ul style="list-style-type: none"> <li>- in the case of a registered user, Customer can record his/her complaint to the customer service of his/her electromobility service provider (EMSP) or the electric charging point operator (CPO) of the given country as well. The CPO's customer service will forward his/her claim into the EMSP's service provider.</li> <li>- in case of ad-hoc user, Customer can call/write to the customer service</li> </ul>	<p>its position regarding the consumer's complaint, and if the immediate investigation of the complaint is possible, the signatures of both the person drawing up the report and the consumer, with the exception of verbal complaints communicated over phone or via other electronic telecommunication means, and the time and place of drawing up the report.</p>			<p>to the customer service of charge point operator (CPO) in Hungary or if the data transfer and processing between the two customer services are necessary to handle the case registered user using roaming service in Hungary.</p>
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	<p>of the charging point operator (CPO) or can also choose MOL Plugee's customer service using the main menu or application of MOL Plugee's website. In the latter case, MOL Plugee's Customer Service will transfer the complaint to CPO's Customer Service, if the complaint cannot be handled immediately.</p>				
<p><b>VII. Communication in writing or electronic mail (email) with Customers and data subjects not qualifying as Customers, responding to questions, data reconciliation</b></p>	<p>Article 6(1)(f) of the GDPR – legitimate interest of the controller</p> <p>The controller's legitimate interest: More effective handling of reports and complaints and ensuring that the necessary information is available where a case cannot be resolved immediately.</p>	<p>Personal data contained in the Customer's request and in written or electronic correspondence (email).</p> <p>In the case of data subjects not qualifying as Customers: the data subject's name, address, telephone number and email address, the data contained in the complaint or report, the data needed for the payment of potential indemnification (bank account number),</p>	<p>The data is retained for <b>5 years</b> pursuant to Article 223 of the Civil Obligations Act (OG: 35/2005, 41/2008, 125/2011, 78/2015, 29/2018) with a view to exercise any potential civil law claims by the Company or to defend against any potential civil law claims by data subjects.</p>	<p><b>MULTICOM Contact Kft 1121 Budapest, Zsigmondy Vilmos utca 8/b)</b> – customer service in the following countries: SLO, RO, SK, CZ, HR</p> <p><b>Pendant Távfelügyeleti és Mérő-ellenőrző Szolgáltató Kft.</b> – customer service in Hungary</p> <p><b>MOL IT &amp; Digital GBS Kft.</b> is responsible for storing communication</p>	

		<p>vehicle-related data in the case of vehicle damage, in particular the make and year of manufacture of the vehicle, the location and time of e-charging, the identifier and type of the charger used and the type of the charging socket used, as well as data contained in the data subject's complaint or report.</p>			<p>that is classified as a complaint</p> <p><b>Pendant</b> can be Data Processor only if the MOL Plugee registered user calls/send e-mail directly to the customer service of charge point operator (CPO) in Hungary or if the data transfer and processing between the two customer services are necessary to handle the case registered user using roaming service in Hungary.</p> <p><b>MOL GBS Magyarország Kft.</b> – indemnification payments (registered office: 1039 Budapest, Szent István utca 14.)</p> <p>In the event of complaints lodged in person at the service station, the <b>employee of the partner company</b> listed under 'Data Processors' is responsible for the direct</p>
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					communication with the customers.
<b>VIII. Demand for payment, receivables management</b>	Article 6 (1) f) of the GDPR (data processing is necessary for the purposes of the legitimate interests pursued by the Company). Legitimate interest: data management for the collection of unpaid debt to the Company after the use of the e-mobility service	Username, surname, first name, e-mail address, address	In case of handling by Customer Service: 30 days from the termination of the contract  In the case of an external debt management company: 5 years from the closing of the debt management case	<b>JOINT LAW OFFICE IGOR SAVIĆ &amp; INES SAVIĆ</b> , - data management, debt collection, legal enforcement, legal representation (Ulica Bele Čikoša 5, 10000 Zagreb, Croatia) taking over and conducting a receivables management procedure	<b>MULTICOM Contact Kft</b> 1121 Budapest, Zsigmondy Vilmos utca 8/b, Hungary) – tracking of delays, sending demand for payment e-mails in the following countries: SLO, RO, SK, CZ, HR  <b>Pendant Távfelügyeleti és Mérő-ellenőrző Szolgáltató Kft.</b> – tracking of delays, sending demand for payment e-mails to registered Users using roaming service in Hungary (registered office: 1045 Budapest Istvántelki út 8., Hungary)  If a request for data provision or other legal assistance becomes

					necessary in the framework of the receivables management, the given MOL Group member may request data and information about the customers/users of the other MOL Group member.
<p><b>IX. Discounts and promotions based on cooperation agreements concluded with other legal entities</b></p> <p>Based on the partnership agreements concluded with legal entities related to e-mobility, the Company provides occasional discounts and promotions to a specific group of Users.</p>	<p>The consent of the data subject pursuant to Article 6 (1) (a) of the GDPR, which is provided in the application at the time of registration or prior to the provision of the data required for the benefit. The Company handles data only to the extent necessary to prove the Customer's entitlement to the discount. The Company does not transfer personal data about the customer to its contractual partners.</p>	<p>For Nissan Partnership Agreement: - VIN/chassis number For a BMW partnership agreement: - MOL partner card number</p>	<p>Data is stored for 30 days from the expiry of the promotion or discount or is deleted immediately after the withdrawal of the consent. Withdrawal of consent shall not affect the lawfulness of the data processing prior to withdrawal.</p>		<p><b>Driivz Ltd.</b> – provision of customer service, data processing related to the promotion and use of the service (registered office: Izrael, Hod Hasharon, HaHarash u. 4.)</p>
<p><b>X. Exercise of legal claims</b></p>	<p>Article 6 (1) f) of the GDPR (data processing is necessary for the purposes of the</p>	<p>User name, last name, first name, email address, the data contained in the report, bank account</p>	<p>The Company retains the documents related to the communication with the Customer Service (e.g.</p>	<p>The employees of Company Regional Security, Group Security, Internal Audit</p>	<p><b>MULTICOM Contact Kft</b> 1121 Budapest, Zsigmondy Vilmos utca 8/b, Hungary)– customer</p>

<p>Data retention for the purpose of exercising of legal claims and for successful defence in a legal dispute or administrative procedure in relation to communication with the Customers and other data subjects by the Customer Service.</p> <p>For example, Article 17 (3) e) of the GDPR may be used for the exercise or defence of legal claims or of administrative proceedings initiated by the Buyers in relation to the contract</p>	<p>legitimate interests pursued by the Company).</p> <p>Legitimate interest of TIFON d.o.o.: exercising of claims by the Company and successful defence in a legal dispute or official proceedings potentially initiated by the Customer.</p>	<p>number, vehicle-related data in the case of vehicle damage, the location and time of e-charging, the identifier and type of the charger used, the type of the charging socket used, the make and year of manufacture of the vehicle, and other data necessary for exercising of legal claims and for successful defence in a legal dispute or administrative procedure (e.g. data voluntary provided by the data subject in the specific request).</p> <p>Source of data: Customer Service.</p>	<p>emails, mails, requests in paper) and other requests made no later than 5 years following their reception by the Customer Service (in case of emails from the time when they become available and in case of telephone conversations from the time of recording) pursuant to Article 223 of the Civil Obligations Act (OG: 35/2005, 41/2008, 125/2011, 78/2015, 29/2018) with regard to exercise any potential civil law claims of the Company or for a potential civil law claim of the Company and for the defence of the potential civil action of the data subject.</p> <p>Where the processing of personal data is necessary for the defence in judicial or administrative proceedings or for the enforcement of the</p>	<p>organizations and TIFON Legal have access to the personal data required for the investigation.</p>	<p>service administration and complaints handling and performs the customer service tasks; responsible for the direct communication with customers in the following countries: SLO, RO, SK, CZ, HR</p> <p><b>MOL GBS Magyarország Kft.</b> – performance of indemnification (registered office: 1039 Budapest, Szent István utca 14.)</p> <p><b>Pandant Távfelügyeleti és Mérő-ellenőrző Szolgáltató Kft.</b> – client service management, complaints handling in Hungary (registered office: 1045 Budapest Istvánutcai út 8.)</p> <p>The partner company operating the service station in agreement with a member of the MOL Group for the operation of the specific service station and also</p>
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			legitimate interest of the Company, the Company shall be entitled, on the basis of its own legitimate interest (Article 6 (1)f) of the GDPR), to process the personal data concerned until the final conclusion of the proceedings or until the enforcement of the legitimate interest by other means (e.g. the conclusion of an out-of-court agreement) and, where it is not necessary to retain the entire written or electronic document, the data subject shall be entitled to make an extract of the document according to the type of the necessary data.		designated at the above data processing purposes: client service management, complaints handling. (The name of the company shall be made clearly visible at the specific service station and the list of the relevant partner companies is available from the <a href="https://www.multipont.hu/toltoallomas">https://www.multipont.hu/toltoallomas</a> website.)  Partners participating in manufacturing chargers and establishment of charging infrastructure indicated at the above purposes (in the event of a damage or complaint, they are involved in investigating where the fault occurred)
<b>XI. Prevention, detection and investigation of fraud and abuse related to the Service</b>	Article 6 (1) f) of the GDPR (data processing is necessary for the purposes of the legitimate interests pursued by the data controllers). Legitimate	Name, data generated during conducting the investigation. The controllers process the data required for conducting the investigation, such as the	If, on the basis of the examination, the notification is unfounded or no further action is required, the data relating to the notification shall be	If the Company initiates an ethics investigation, the members of the Ethics Council shall have access to the data necessary for the investigation.	<b>MOL IT &amp; Digital GBS Kft.</b> (1117 Budapest, Budafoki út 56.) - provision of services closely related to data processing.

<p>The prevention and investigation of fraud and abuse are governed by MOL Group's Code of Ethics and Business Conduct, Code of Business Partner Ethics and the Rules of Procedure of the Ethics Council ("Code of Ethics"), which are available here: <a href="http://www.tifon.hr">www.tifon.hr</a></p>	<p>interest: the prevention and detection of irregularities and infringements endangering the assets, business secrets, intellectual property, reputation and goodwill of data controllers or which pose a threat to appropriate work environments based on respect and free from fear and retaliation, and to hold the persons responsible accountable.</p>	<p>card number along with the 'invoice data' otherwise also processed by them (e.g. the name, article number, quantity and price of the Service purchased, time and place of purchase, etc.) in order to uncover and investigate any possible misuse of the card, for the period required to conduct such investigation.</p>	<p>deleted within 60 days of the completion of the investigation. Where action is taken on the basis of the investigation, including a measure against the notifying person for legal proceedings or disciplinary action, the information relating to the notification may be processed in the employer's notification system until the final conclusion of the proceedings initiated on the basis of the notification at the latest.</p>	<p>- If the Company initiates other procedures to prevent, detect and investigate fraud and abuse, employees of Regional Security, Group Security and Internal Audit organisations will have access to the data required for the investigation. - If the conduct of the investigation involves other MOL Group members and the company pursues a legal claim on the basis of the investigation, the data will be accessed by the HR organisation of the given company, the HR organisation of the Company, the legal organisation of the given company and the legal organisation of the Company.</p>	
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Data controllers and data processors: The privacy notice and the interest balancing test are available at: [www.molplugee.hu/legal](http://www.molplugee.hu/legal).

**Name, postal address, telephone number, website (where the privacy notices are available) and email address of the data controller(s):**

**TIFON d.o.o.** – registered office: Zadarska ulica 80, Zagreb, Croatia, PIN: 77607495225, phone number: + +385 (1) 6160-600 , web: [www.tifon.hr](http://www.tifon.hr), e-mail: [info@tifon.hr](mailto:info@tifon.hr)

**MOL Plc.** - registered office: 1117 Budapest, Október huszonharmadika u. 18., phone number: +36-1-881-8111, website: [www.molplugee.hu](http://www.molplugee.hu), email address: [info@molplugee.hu](mailto:info@molplugee.hu)

In case of Data process regarding e-roaming (I. and IV-VI). :

MOL Plc. and MOL Group companies, defined in data processing nr. I. whose are involved in the e-mobility service, are considered as joint Data Controllers, whereby the purpose and framework of data processing is jointly determined, and they are jointly responsible for data processing.

In addition to the above, the Company pursuant to Article 6 (1)f) of the GDPR (based on the legitimate interest of the Company) uses the services of its legal partners for the purpose of managing and successfully pursuing its outstanding claims and for this purpose transmits to them the personal data necessary for this purpose (including, in particular, their contractual partners, their contact points and data specified in the contracts thereof, and data relating to receivables) which act as separate controllers as set out in their privacy notices. At the request of the data subject, the Company shall provide information on its partner in charge of the specific processing, its availability and the activities it provides, and the scope of the data processed in this context.

The above controller partners of the Company are deemed to be separate data controllers and apply their own privacy notices.

**Contact data of the data controller's Data Protection Officer:**

- **TIFON d.o.o.** – Nikolina Ivanić, e-mail address: [GDPR@tifon.hr](mailto:GDPR@tifon.hr)
- **MOL Plc.** – Dr. Kara Pál - email address: [dpo@mol.hu](mailto:dpo@mol.hu)

**Persons at the data controller who are authorized to access to the data (by data processing purposes):**

- **Recording of telephone conversations with the Company's Customer Service:** Employees of the E-mobility organisation.
- **Handling and responding to consumer complaints lodged in writing, electronically (email), over the phone or in person, as well as the management of complaints concerning the service:** Employees of the E-mobility organisation, competent employees of the Legal Department and employees of the law firm involved in the exercise of legal claims.



- **Communication in writing or electronic correspondence (email) with Customers and data subjects not qualifying as Customers, responding to questions, data reconciliation:** Employees of the E-mobility organisation, competent employees of the Legal Department, employees of the law firm involved in the exercise of legal claims and employees of the company responsible for receivables management.
- **Data retention pertaining to communication by the Customer Service with Customers and other data subjects for the purpose of the exercise of legal claims:** Employees of the E-mobility organisation, for the purpose of the potential exercise of legal claims and defence in a legal dispute or official proceedings, the competent staff members of the Legal Department and employees of the law firm involved in the exercise of legal claims.

**Name, postal address, telephone number, website (where the privacy notices are available) and e-mail address of the data processor(s) and other data controller recipient(s):**

- **Driivz Ltd.** – provision of ancillary services related to data processing in the course of electromobility services, operation of telephone applications, server services (registered office: Izrael, Hod Hasharon, HaHarash u. 4.) shachar.inbar@driivz.com
- **Pandant Távfelügyeleti és Mérő-ellenőrző Szolgáltató Kft.** – customer service administration and complaints handling (registered office: 1045 Budapest Istvántelki út 8., telephone address: +36-1-370-2333, website: [www.pandant.hu](http://www.pandant.hu), email address: [info@pandant.hu](mailto:info@pandant.hu))
- **MOL IT & Digital GBS Kft.** – management of call centre voice recordings (registered office: H-1117 Budapest, Budafoki út 79, email address: miklkiss@msc.mol.hu)
- **MOL GBS Magyarország Kft.** – indemnification payments (registered office: 1039 Budapest, Szent István utca 14., telephone number: 061-209-0000, website: [www.mol.hu](http://www.mol.hu), email address: [ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu))
- **MULTICOM Contact Kft** – customer services (registered office: 1121 Budapest, Zsigmondy Vilmos utca 8/b, phone: +36 (1) 310-7145; e-mail: [info@multicom.hu](mailto:info@multicom.hu))
- **Joint law office Igor Savić & Ines Savić** – legal representation (registered office: Ulica Bele Čikoša 5, Zagreb, Croatia, phone: +385 (1) 2317 920, e-mail: [savic@savic.hr](mailto:savic@savic.hr))

**Processing of sensitive personal data for the purpose specified in this Privacy Notice:** No sensitive data will be processed.

**Transfers of data to third countries:** Parties shall record that the Processor has access to individual personal data in Israel, in which case the Processor shall ensure the adequate level of data protection with regard to the processing of personal data in accordance with Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, which is available at the following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011D0061&from=HU>.

**The existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject:** Data controller does not carry out automated decision-making nor profiling activity.

**Data security measures:**

The Company designs and implements data processing operations so as to ensure protection of the privacy of data subjects in the course of implementing the GDPR and other laws on data processing.

The Company ensures the security of data and takes the technical and organisational measures and develop the procedural rules required for enforcing the GDPR as well as other rules on the protection of data and secrets.

The Company protects the data by measures proportionate to risks in particular against unauthorised access, alteration, forwarding, disclosure, deletion or destruction, as well as accidental loss and damage, and inaccessibility due to a change in the technology used. In this framework, the Company stores the data subject's personal data in a password-protected and/or encrypted data base. In the framework of risk-proportionate protection, the Company protects data with firewalls, anti-virus software, encryption mechanisms, content filtering and other technological and process solutions. It continuously monitors personal data breaches.

**Your data protection rights:**

The GDPR contains in detail your data protection rights, your possibilities of seeking a legal remedy and the restrictions thereof (especially Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You can request at any time information about your personal data processed, you can request the rectification and erasure of your personal data or the restriction of their processing, furthermore you can object to the data processing based on a legitimate interest and to the sending of direct marketing messages, and you have the right to data portability. We summarize the most important provisions below.

The Company particularly draws attention to the following during the provision of information: **You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which the Company pursues in its legitimate interest. In this case, the Company may no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing that override your interests, rights and freedoms, or which are related to the establishment, exercising or defence of legal claims.**

**Right to information:**

If the Company processes your personal data it must provide you information concerning the data relating to you – even without your special request thereof – including the main characteristics of the data processing just as the purpose, grounds and duration of control, the name and address of the Company and its representative, the recipients of the personal data (in case of data transfer to third countries indicating also the adequate and appropriate guarantees), the legitimate interests of the Company and/or third parties in case of a data processing based on a legitimate interest, furthermore your data protection rights and your possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), in the case if you have not had yet all this information. The Company provides you the abovementioned information by making this privacy notice available to you.

**Right of access:**

You have the right to obtain from the Company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain information related to the data processing such as the purpose of the data processing, the categories of the personal data processed, the recipients of the personal data, the (scheduled) duration of the data processing, the data subject's data protection rights and possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), furthermore information on the source of the data where they are collected from the data subject.

Upon your request, the Company shall provide a copy of your personal data undergoing processing. For any further copies requested by you, the Company may charge a reasonable fee based on administrative costs. Where you make the request by electronic means, and unless otherwise requested by you, the information is provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Such information is provided free of charge if the party requesting the information has not submitted to the data controller any application for information relating to the same scope of data before within the same year. For offline users, the costs of the second request: HUF 500 (which amount includes postage and CD costs).

If you request the voice recording taken at the customer service to be made available, the data controller makes the requested recording available in the following manner.

For online users: The encrypted file is sent through the Secure Data Room. The key required to listen to the recording is made available by the data controller via SMS.

For offline users: the voice recording is copied to a CD as an encrypted file, which CD is then sent to the customer. The key required to listen to the recording is made available by the data controller via SMS.

**Right to rectification:**

You have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Right to erasure:**

You have the right to obtain from the controller the erasure of personal data concerning you without undue delay and the controller has the obligation to erase personal data without undue delay where certain grounds or conditions are given. Among other grounds the Company is obliged to erase your personal data upon your request for example if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; if you withdraw your consent on which the processing is based, and where there is no other legal ground for the processing; if the personal data have been unlawfully processed; or if you object to the processing and there are no overriding legitimate grounds for the processing; if the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; or if the personal data have been collected in relation to the offer of information society services.

The above do not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation that stipulates the processing of the personal data, applicable under European Union or Member State laws to which the Company is subject;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- d) for the establishment, exercise or defence of legal claims.

#### **Right to restriction of processing:**

You have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by you, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- (c) the Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- (d) you have objected to processing, pending the verification whether the legitimate grounds of the controller override your legitimate grounds.

Where processing has been restricted according to the abovementioned reasons, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

You shall be informed by the controller before the restriction of processing is lifted.

#### **Right to object:**

You have the right to object to the processing of your personal data as a result of the Company's legitimate interest at any time for reasons relating to your own situation. In this case, the Company may no longer process personal data unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

**How to exercise your rights:**

The Company shall provide information on action taken on a request based on your abovementioned rights without undue delay and in any event **within one month** of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Company shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you make the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by you.

If the Company does not take action on your request, the Company shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the competent data protection supervisory authority ( Personal Data Protection Agency, in Croatian: "Agencija za zaštitu osobnih podataka"; abbreviated "AZOP" and seeking a judicial remedy. Address, telephone number, fax number, email address and website of AZOP: Selska cesta 136, Zagreb, Croatia, Tel: 00385 (0)1 4609-000, e-mail: [azop@azop.hr](mailto:azop@azop.hr), website: [www.azop.hr](http://www.azop.hr).

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the National Authority for Data Protection and Freedom of Information; in Hungarian: 'Nemzeti Adatvédelmi és Információszabadság Hatóság'; (abbreviated as 'NAIH') and seeking a judicial remedy. Address, telephone number, fax number, email address and website of the NAIH: 1125 Budapest Szilágyi Erzsébet fasor 22/C., Tel: +36 1 391 1400, Fax: +36-1-391-1410, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: <http://naih.hu/>

The information shall be provided by the Company in writing, or by other means, including, where appropriate, by electronic means. When requested by you, the information may be provided orally, provided that your identity is proven by other means.

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR. You can read about how to contact supervisory authorities within the EU here: [https://edpb.europa.eu/about-edpb/board/members\\_hu](https://edpb.europa.eu/about-edpb/board/members_hu). You shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning you. You shall further have the right to an effective judicial remedy where the competent supervisory authority does not handle your complaint or does not inform you within three months on the progress or outcome of the complaint lodged. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, you shall have the right to an effective judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company or its data controller or processor partner shall be brought before the courts of the Member State where the Company, the controller or the processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.