

## PRIVACY NOTICE

### 1. Introduction

**Budapest Waterworks Plc.** (registered office: 1138 Budapest, Váci út 182; company registration number: 01-10-042451; www.vizmuvek.hu; ugyfelszolgalat.vizmuvek.hu; hereinafter: **Company/Controller**) pays special attention to the compliance of its activities with the effective Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Regulation 95/46/EC (General Data Protection Regulation) (hereinafter: **Regulation**), the requirements and practices of the water utility sector.

The Controller intends to ensure the transparency of its data processing activities by this Privacy Notice (hereinafter **Notice**) and the related internal regulations, while informing its consumers, applicants, inquirers or other natural persons (hereinafter: **Data Subjects**) of their options arising from their right of informational self-determination.

The purpose of this Notice is to determine the legal terms and conditions of all data processing activities performed by the Controller, thereby ensuring the Data Subject's right of informational self-determination and, on the other hand, to provide the Data Subject detailed information about their rights, legal remedies and measures taken to safeguard the security of their personal data.

#### **The structure of the Notice:**

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3. Scope of the Notice
4. Data processing principles
5. Purpose of the processing
6. Personal data processing by main data subject types
7. Legal basis of data processing in connection with the public service contract, scope of data processed, retention period
8. Data processing connected to the website operated by the Company (registration, processing without registration, use of cookies, data processing related to surveys, questionnaires, data processing on the 'Toborzó' (recruitment) portal)
9. Other data processing (recording of telephone conversations with customer service, recording administration with personal customer service, data processing for marketing purposes, data processing for market and public opinion polling, incidents, damages, asset protection, users to be protected)
10. Data transfer, activities of data processors
11. Rights and remedies
12. Data security, storage and retention of personal data
13. Key legislation relevant to the Company's activities
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Should the Data Subjects have any questions that are not clear in this Notice, please contact our Data Protection Officer directly as described in Section 11 of this Notice.

### 2. Definitions

Data file	All data managed in one record.
Data processing	A series of data processing and technical activities, irrespective of the method or instrument used for the implementation of the tasks, or the place of application, providing that the technical activity is performed on the data;
Data Processor	Any natural or legal person or organisation without legal personality processing personal data on the grounds of a contract concluded with the Controller, including contracts concluded pursuant to legislative provisions.
Data management	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction
Controller	Any natural or legal person or organisation without legal personality which, alone or jointly with others, determines the purposes and means of the processing of data; makes and executes decisions concerning data processing (including the means used) or contracts a data processor to execute thereof.
Data transfer	Ensuring open access to the data to specific third parties.
Data erasure	Turning of data into an unrecognisable form, from which they cannot be restored any more.
Personal data breach	Any intentional or negligent breach of security of the personal data entrusted to the Company, in particular the transfer, erasure, loss or disclosure of the data.
Blocking of data	Marking data with a special ID tag to indefinitely or definitely restrict its further processing.
Cookie	A text file that is installed on the user's computer hard disk by the Web server of the Website for later identification. If the browser returns a previously saved cookie, the cookie hosting provider has the option to link the current visit of the User to a previous cookie, but only for its own content
Data Subject	Any natural person identified or identifiable, directly or indirectly, on the basis of specific personal data. As regards the data processing covered by this notice, data subjects are primarily the Client of the Company as well as the person whose data is processed by the Company in connection with the public utility service.
Consumer	A natural person who enters into a public utility contract with the Company.
Third Party	Any natural or legal person, or any entity without legal personality, who is not the data subject, the Controller or the processor.
Consent	Any freely and expressly given specific and informed indication of the will of the data subject by which he signifies his agreement to personal data relating to him being processed fully or to the extent of specific operations.
Document management	Receipt, transmission, mailing, registration (recording), reproduction, transmission, filing, scrapping, and transfer of documents not eligible for scrapping to the archives.
Archives	The place of registration, collection and safe storage of the systematic circulation of documents and parcels generated during the operation of the Company. Address: 1037 Budapest, Kunigunda útja 60/B.
Data of public interest	Any known fact, data and information, other than personal data, that are processed and/or used by any person or body attending to statutory state or municipal government functions or performing other public duties provided for by the relevant legislation (including those data pertaining to the activities of the given person or body), irrespective of the method or format in which it is recorded, and

	whether autonomous or part of a compilation, such as, in particular, data relating to powers and competencies, organizational structures, professional activities and the evaluation of such activities covering various aspects thereof, such as efficiency, the types of data held and the regulations governing operations, as well as data relating to financial management and to contracts concluded.
Special data	The personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
Information of public interest	Any data not belonging to the category of public interest data, that are prescribed by law to be published, made available or otherwise disclosed for the benefit of the general public.
Disclosure	Making the data available to anyone.
Profiling	Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
Personal data	Data relating to the data subject, in particular by reference to the name and identification number of the data subject or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity as well as conclusions drawn from the data in regard to the data subject.
Business secret	Any fact, information, or other data in our possession relating to our Company or the Data Subject that is not known by the public and the obtaining, utilisation or disclosure of which by unauthorized persons would harm or endanger the legitimate financial interests of our Company or the Data Subject.
Objection	A declaration made by the Data Subject objecting to the controlling of their personal data and requesting the termination of data processing, as well as the erasure of the data processed.

### 3. Scope of the Notice

The scope of this Notice covers

- all data processing of the Company as a public utility service provider, which contains data of natural persons who are or wish to become clients of the Company, and who are related to persons who are clients of the Company in such a way that their personal data must be processed for the supply of the services of the Company;
- the services and data processing in connection with the Company's website (hereinafter: Website), not including the website related to the Vízplusz (Waterplus) Card ([www.vizpluszkartya.hu](http://www.vizpluszkartya.hu)),
- the Company 's data processing for marketing, market and opinion polling purposes, as well as data processing of incident and damage events;
- the data processing of the Company concerning the Data Subjects (Section 9.5.) for security purposes; data processing of data of other persons having some other contractual relationship with the Company.

Unless otherwise stated, the scope of the Notice does not cover the services and data processing relating to the services, other campaigns of, or the content published by any third party advertising or otherwise appearing on the Website. Unless otherwise stated, the scope of this Notice does not cover the services and data processing of websites or service providers which are referenced on this Website.

### 4. Principles of data processing

The Controller strives to fully apply the following principles of personal data processing in its data processing activities:

- **Principles of lawfulness, fairness and transparency**

In the course of data processing, the Controller shall act in accordance with the requirements of good faith and fairness, in cooperation with the User and shall endeavour to carry out its data processing activities in a manner that is transparent for the User.

- **Principle of purpose limitation**

Personal Data are collected by the Controller only for specified, explicit and legitimate purposes and the Controller processes the User's data in a manner consistent with the purposes set out in the applicable Privacy Notice. The Controller erases personal data in all cases where the purpose of data processing has ceased and there is no legal obligation or legitimate interest in further storage and processing of the data.

- **Principle of data minimisation**

The personal data provided by the Data Subject are relevant for the purpose of the data processing and the Controller ensures that the personal data processed by it are limited to what is necessary. The Controller does not process any data that are unnecessary for the purpose of processing. In addition, the Controller shall endeavour to minimize data processing where the IT background and the interest in the purpose of data processing so permit.

- **Principle of accuracy**

The Controller shall take all reasonable steps to immediately erase or rectify any personal data that is inaccurate for the purposes of the data processing, in order to ensure that the data are kept up to date.

- **Storage limitation**

In order to ensure that the storage of personal data is limited to the time necessary, the Controller shall establish erasure deadlines.

- **Integrity and confidentiality**

The Controller protects the personal data particularly against unauthorised access, alteration, transfer, disclosure, erasure or destruction, as well as inadvertent destruction and damage, along with inaccessibility due to changes occurring in the technology used.

- **Accountability – built-in and default privacy**

Taking into account state of the art technology, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of the Data Subjects posed by the processing, the controller shall, both at the time of the determination of the means for processing and at the time of the processing itself, implement appropriate technical and organisational measures which are designed to implement data-protection principles, and to fulfil requirements of the Regulation as well as to integrate the necessary safeguards into the processing in order to protect the rights of data subjects.

## **5. Purpose of the processing**

The primary purpose of the Controller's data processing is to perform the contract concluded with the Consumer in connection with the performance of the public task, and to establish and maintain such a contract, and to ensure the appropriate quality of other services requested by the Consumer. The Controller only processes personal data for a specific purpose. Data processing is consistent with the purpose of processing in all phases. Data are collected and processed fairly and lawfully. The Controller tries to ensure that only such personal data are processed that are essential for the purpose for which they were recorded, and that are suitable to achieve that purpose. Personal data may be processed to the extent and for the duration necessary to achieve its purpose.

The data processing of the Company may serve the following purposes:

- Concluding a contract with a consumer.
- Provision of the service based on the contract concluded with the Consumer, identification of the place of consumption, inspection of the place of consumption and making it suitable for the service.
- Determining eligibility for the service.
- Processing of special personal data that constitute the basis of the user status to be protected.
- Measuring the service provided to the consumer, ensuring the quality and quantity requirements of the service.
- Metering the object of service, reading consumption.
- Defining payment obligations, billing, manage receivables.
- Identifying the Consumer, Applicant, Inquirer, Other Data Subject.
- Keeping in contact with the Consumer, Applicant, Inquirer, other Data Subjects, handling of their complaints, notifications, needs, registration and investigation thereof.
- Enforcing claims arising from legal relationships.

- Direct marketing, market research and opinion polling.
- Provision of services via the website.
- Website development.

## 6. Personal data processing by main Data Subject types

The Data Subjects of the personal data processed in connection with the Controller's activities are typically the following natural persons:

- **Consumer** (the natural person who enters into a public utility contract with the Controller)
- **Registered User** (the natural person who is registered on the Website)
- **Applicant** (the natural person who contacts the Controller for the use of the public utility service, but the service relationship is established at a later date or not at all)
- **Authorised person** (a natural person acting on behalf of another natural or legal person in accordance with Section 6:11 of the Civil Code)
- **Other Data Subject** (the natural person who visits the Website and/or subscribes to the Controller's newsletter and/or is affected by a claim event and/or intends to access the Controller's site)

## 7. Legal basis of data processing in connection with the public service contract, scope of data processed, retention period

The data processing performed by the Controller is generally of **mixed legal grounds**, i.e. it includes data processing authorisations based on contract, law, legitimate interest (based on a weighing of interests, if necessary based on an impact assessment) or consent.

There are **three ways in which the Controller may obtain personal data concerning the Data Subject**. Primarily as a result of the provision of data by the Data Subject for the purpose of concluding and performing the contract, or, during data collection from the Data Subject (telephone/customer service) and, thirdly, through data transfer to the data processor entrusted by the Controller for maintaining contact with the Data Subject.

The Controller retains the data at its disposal for different data retention purposes and legal grounds, for a period determined by law, and thereafter blocks or erases the data, taking into account its own interests and those of the Data Subject. **The maximum duration of data processing varies depending on the legal ground on which the data of the Data Subject are processed.**

The following table summarises some of the data processed by the Controller in the context of its public task, the related data processing legal grounds and their retention periods:

	<b>Processed data</b>	<b>Legal basis</b>	<b>Explanation</b>	<b>Retention period</b>
7.1.	<b>Natural personal identification data of the Consumer</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	The Controller processes the following data of the Consumer: name, address, mother's name, place and date of birth. If the Consumer's data change and it is not reported, the Controller shall request the supply of the Consumer's data from the personal data and address register in accordance with the applicable laws.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)
7.2.	<b>Natural personal identification data of the applicant</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	In order to connect to the water utility network, by filling in the "Declaration of Principles for Application" form, the Applicant supplies to the Controller their name, address and details of the planned property construction (e.g. map copy, title deed, connection plan)	For 3 years from the receipt of the form.
7.3.	<b>Phone number and email address for keeping contact with the Data Subject;</b>	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation) - <b>Legitimate interest as legal basis</b> (Article 6 (1) (f) of the Regulation)	Subject to the Data Subject's consent, the Controller processes the telephone numbers and e-mail addresses required to maintain contact. The Data Subject is not obliged to provide the telephone number and e-mail address. In the case of consumer communities, the Controller processes the data of the representative of the community, especially the common representative of the condominiums. The Controller shall have the right to retrieve, if necessary, the telephone number necessary for contacting the Data Subject from a lawfully published file. In relation to data required for contact and in order to assert a legitimate interest, the Controller may, based on an interest balancing test performed by it, manage the telephone number differently from the original data processing purpose in order to reconcile the date of work on site or to	Until consent is withdrawn/ 6 months after the cessation of the contract.

			settle any actual debt or prevent the accumulation of debt of the Data Subject.	
7.4.	<b>Data required for certifying a change in Consumer</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	In the event of a change in the Consumer, the Controller may process all the data that are necessary for implementing or proving the change. The Controller shall keep a copy of the document certifying the change. The Data Subject shall have the right to delete from the copy any data that are not necessary to justify the change in the identity of the Consumer.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)
7.5.	<b>Copy and data of documents</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	The Controller makes a copy of each document certifying the data in order to establish the accuracy of the data. Exceptions to this are ID card type identity documents, which are not copied by the Controller.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)
7.6.	<b>Data of the consumption site and measuring devices</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)  - <b>Legitimate interest as legal basis</b> (Article 6 (1) (f) of the Regulation)	The Controller processes the technical and technology data concerning the consumption site and the measuring devices, in particular the data contained in the title deed, site plan and plans. Based on the legitimate interest of the Controller, during the reading of the measuring devices and technical examinations, the Controller takes photos of the measuring devices and technical facilities as well as records the GPS coordinates of the measuring device.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)
7.7.	<b>Data of natural persons other than the Consumer</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	Primarily, the data of the owner of the consumption site and the person authorized for administration may be processed. If the contract may not be concluded and the services cannot be provided without the details of the beneficial owner, the personal data of the owner will be processed by the Controller.	Until the purpose of data processing is achieved or the Data Subject requests data erasure; until the end of the limitation period of 5 years in accordance with Section 6:16 of the Civil Code.



7.8.	<b>Data relating to Data Subject's consumption and to the provision and use of the service</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	The processing of these data is closely related to the performance of the contract. The Controller processes the data generated during the performance of the Contract, in particular data related to consumption, complaints, deficiencies of the service, unlawful acts.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)
7.9.	<b>Data on fees, charges and receivables payable and paid by the Data Subject</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	The Controller shall manage all data related to the Data Subject's payment obligation, from which it is possible to determine whether the Data Subject's payment obligation is fulfilled or not.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)
7.10.	<b>Data generated while contacting customer service</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	This includes all data generated by the customer service during the relationship between the Data Subjects and the customer service. In this case the processing of data is closely related to the procedure initiated by the Data Subject, as well as to the contract, the fulfilment of the contract and the legal obligation.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)
7.11.	<b>Phone call with customer support</b>	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation) - <b>Statutory obligation as legal basis</b> (Article 6 (1) (c) of the Regulation) (Section § 17/B of the Consumer Protection Act)	The Controller shall record and process the audio recording of the conversation between the Data Subject and the customer service as provided in the applicable laws, primarily the Consumer Protection Act. The Data Subject will always be informed about the recording before the conversation begins.	For 5 years from the audio recording (Section 17/B (3) of the Consumer Protection Act)
7.12.	<b>Data related to other services</b>	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	If the Data Subject uses services other than the public utility service provided by the Controller, a new contractual relationship shall be established. In this case, the data will be processed on the basis of the specific contract.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)

<p>7.13.</p>	<p><b>Documents proving the user's protected status</b></p>	<p><b>-Statutory obligation as legal basis</b>          (Article 6 (1) (c) of the Regulation)          (Section 61/A of the Act on Water Utility Supply)</p>	<p>The Controller shall keep records in order to guarantee the benefits to the users to be protected, from which benefits to which the Data Subject is entitled may be established clearly. Registration must be initiated by the Data Subject and the request must be accompanied by documents proving that the user is included among the users to be protected (as defined in Government Decree 58/2013 (27 February)).</p>	<p>Data erased from the records for 5 years from the date of erasure (Section 61/A(7) of Act CCIX of 2011 on Water Utility Supply)</p>
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## 8. Data processing on the website operated by Fővárosi Vízművek Zrt.

([www.vizmuvek.hu](http://www.vizmuvek.hu); [www.ugyfelszolgalat.vizmuvek.hu](http://www.ugyfelszolgalat.vizmuvek.hu))

Visiting the Controller's Website is not subject to registration, and the Web Server does not record any user information when you visit the Website. The Controller maintains confidentiality of data between the Data Subject's computer and the Site on its Website and therefore uses a secure (HTTPS) Internet communication protocol.

However, the Controller reserves the right to provide services through the Website that are subject to registration (e.g., promotions, sweepstakes, newsletters, access to online customer support).

### 8.1. Registration

Data Subjects have two options to initiate registration for online administration services.

**During registration made through the Citizen Portal**, Data Subjects can use the Controller's online administration services with their username and password used for the Citizen Portal. The Controller of the authentication process on the Citizen Portal is the body responsible for electronic services of the central government (Central Customer Registration Register), i.e. the minister responsible for e-administration. Information regarding the data processing of the Citizen Portal authentication process and the exercise of the rights of the Data Subject are provided by the Ministry of Interior (as Controller).

**During registration not made through the Citizen Portal**, the Data Subject shall provide the data specified in the registration data sheet (Data subject's name, e-mail address, telephone number, device ID, account ID, business partner number, manufacturing number). The Controller reserves the right to specify some data on the make the registration form a condition of the registration (e.g.: an e-mail address to confirm the registration), and to alter the contents of the registration form, to delete or create new data fields in the registration form, especially if the needs of users or changes in legislation make this necessary or justified. The Controller shall inform the Data Subjects of any changes. The data provided during the registration are handled by the Controller and will not be transferred to a data processor or any other data controller. The data shall be accessible to persons acting in the interest of the Controller – in particular agents and employees – who need them to carry out their activities and who are aware of their obligations regarding the processing of the data.

**The primary purpose of the information provided** is to provide a service subject to registration, to identify the Data Subject, **while its secondary purpose** is to provide the services of the Website, to develop the services and to send newsletters and advertisements to the users as well as to conduct market research and opinion polling.

**Scope of processed data:** Data Subject's name, e-mail address and telephone number, device ID, manufacturing number. In the case of registration with a Citizen Portal account, the data processed are complemented with the name, date and place of birth and mother's name of the Data Subject.

**Legal basis of data processing:** in principle the Data Subject's consent (Article 6 (1) (a) of the Regulation). In the case of registration with a Citizen Portal account, the legal basis for data processing concerning the mother's name as well as the Data Subject's date and place of birth is the statutory provision pursuant to Article 6 (1) c) of the Regulation.

**Duration of data processing:** The Controller processes the data until the consent is revoked or until registration is cancelled.

Processed data	Legal basis	Explanation	Retention period
Registered user's data	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation)	Upon registration, the Data Subject provides the Controller the data specified in the registration form.	Revocation of consent/cancellation of registration of the Data Subject
Mother's name, date and place of birth of the Data Subject	- <b>Statutory obligation as legal basis</b> (Article 6 (1) (c) of the Regulation)	Required information when registering with the Citizen Portal account.	Revocation of consent/cancellation of registration of the Data Subject

**8.2. Data processing without registration**

**8.2.1. Contact via online form**

The Data Subject can also use the Website to contact the Controller and to initiate an order for various services as well as to register for an event, which requires the completion of an online contact form. The Controller shall contact the Data Subject by using the provided contact details within the shortest possible time, within the limits of their capacity.

**Purpose of processing:** Contacting the Data Subject or identifying the Data Subject.

**Scope of processed data:** Name, e-mail address, telephone number of the Data Subject.

**Legal basis of data processing:** consent of the Data Subject in each case (Article 6 (1) (a) of the Regulation).

**Duration of data processing:** the Controller will process the data until the consent is revoked, or in the case of ordering a service, for 8 years after the provision of the service or for 6 months if the service is not used.

Processed data	Legal basis	Explanation	Retention period
Data Subject name, e-mail address, phone number	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation)	The Data Subject will provide the Controller with the information specified in the online contact form.	For 8 years/6 months after the year of revocation of the Data Subject's consent/issue of the last accounting document related to the contract

### 8.2.2. Reporting online measurement statuses

The Data Subject can record the metering status through the Website without registering or logging in, just using the data in their bill.

**The purpose of data processing:** Identification of the Data Subject, facilitation of communication of meter statuses, billing.

**Scope of processed data:** device identification number, manufacturing number, current meter status, Data Subject’s e-mail address.

**Legal basis of data processing:** The consent of the Data Subject (Article 6 (1) (a) of the Regulation) and, after the commencement of the substantive administration, the existing public service contract (Article 6 (1) (b) of the Regulation) is the legal basis for data processing.

**Duration of data processing:** The Controller will retain the data provided for 8 years after the year of issue of the last accounting document related to the contract.

Processed data	Legal basis	Explanation	Retention period
Identification number, manufacturing number, current metering status of the data subject’s device	- <b>Contract as legal basis</b> (Article 6 (1) (b) of the Regulation)	The Data Subject shall provide the Controller with the information required for billing in the online form.	For 8 years after the year of issue of the last accounting document related to the contract (Section 169 of Act C of 2000 on Accounting)
Data subject’s email address	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation)	It is used to send a certificate to the Data Subject and it is not stored by the Controller.	It will be erased immediately after sending the certificate.

### 8.3. Use of cookies

The Data Processor **places and reads cookies on the Data Subject's computer** in order to provide personalised service.

The Controller uses the following cookies:

- **Session cookie:** session cookies are automatically deleted after the Data Subject's visit. These cookies are used to make your Website more efficient and secure, so they are essential for certain features of the Website or certain applications to function properly.
- **Persistent cookie:** The Controller also uses persistent cookies for a better user experience (e.g. providing optimized navigation). These cookies are stored in the browser's cookie file for a longer period of time. The duration of this depends on the settings used by the Data Subject in their web browser.
- **Security cookie.**
- **PHPSESSID:** php session, php identifies the user and remains active until the browser window is closed.
- **cookies accepted:** cookie noting the acceptance of the cookie policy in the footer, expiring in 10 years.
- **overlay seen once:** the cookie that shows the document in overlay (so as not to show it to the user again), expires in 10 years.
- **banner rotation:** if a banner block is used, the cookie that stores the last displayed banner ID, expiring in 1 day.
- **voting:** to comment on voting in a particular poll, with an expiry date of 300 days.

- Google Adwords Remarketing: a tracking code that is based on the ability of the Controller to later contact the visitors of the page with remarketing ads on web pages in the Google Display Network. The remarketing code uses cookies to tag visitors. The users of the Website may disable these cookies by visiting the Google Ads Preferences Manager and following the instructions there. After that, they will not receive personalized offers from the Controller.

- Google Analytics: the Google's analytics service analyses user interactions on a website using cookies stored on users' computers, with an expiry date of 2 years. The analytical information collected by the Google Analytics cookies is transmitted to and stored on Google's servers. This information is processed by Google on behalf of the Website Operator in order to evaluate users' website visitation patterns, compile reports on the frequency of use of the Website, and provide other use-related services to the Controller. Google do not link the IP address transferred through the browser by the Google Analytics application to any other data.

More information about cookies used by Google can be found on the following link: <http://www.google.com/policies/technologies/ads/>

The Google Privacy Notice ("Privacy Policies") is available at the following link: <http://www.google.com/policies/privacy/>.

**Scope of processed data**: ID number, date, time, and previous page visited.

**The purpose of data processing** is to identify, distinguish, track Data Subjects, and prevent the loss of data, and to ensure the effectiveness of the Website.

**Legal basis of data processing**: the legitimate interest of the Controller in the case of cookies providing basic functionality (Article 6 (1) (f) of the Regulation) and the consent of the Data Subject (Article 6 (1) (a) of the Regulation) in the case of statistical cookies.

**Basic functionality cookies**: they ensure the proper functioning of the website, facilitate its use, and collect information about its use without identifying our visitors.

<u>Legal basis of data processing</u>	<u>Purpose of data processing</u>	<u>Duration of data processing</u>	<u>Used cookies</u>
- <b>Legitimate interest as legal basis</b> (Article 6 (1) (f) of the Regulation)	Ensuring the proper functioning of the website	to the end of the visitor session	<b>session cookie</b> : essential for certain functions and applications of the website to operate properly
		depends on browser settings	<b>persistent cookie</b> : for better user experience (e.g. providing optimised navigation)
		until the end of the visit	<b>security cookie</b> : necessary for the secure operation of the website
		300 days	<b>voting_ cookies</b> : cookies that store voting information
		10 years	<b>cookies_accepted</b> : cookie containing cookie management information <b>overlay_seen_once</b> : a cookie that displays a document in an overlay

**Cookies for statistical purposes**: they allow you to obtain more detailed analytical information about your use of the website and help us improve our website.

<u>Legal basis of data processing</u>	<u>Purpose of data processing</u>	<u>Duration of data processing</u>	<u>Used cookies</u>
- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation)	Collecting information about how our visitors use our website	2 years	<b>Google Analytics cookies</b> : Google service that analyses user interactions on a web page ( <a href="https://developers.google.com/analytics/devguides/collection/gajs/cookie-usage">https://developers.google.com/analytics/devguides/collection/gajs/cookie-usage</a> )
		1 day	<b>banner_rotation</b> : if a banner blocker is used, the cookie that stores the last displayed banner ID

Most browsers have a **“Help” function** in their menu bar that informs them how the data subject, in their own browser,

- can disable cookies,
- can accept new cookies,

can instruct their browser to set a new cookie or how to turn off other cookies.

**8.4. Data processing related to surveys and questionnaires concerning the Controller**

The Controller intends to assess, on a case-by-case basis, at its own discretion or for the purposes of compliance with the law, the expectations and satisfaction of Consumers (Data Subjects) towards the Controller with the help of questionnaires or surveys uploaded on the [www.vizmuvek.hu](http://www.vizmuvek.hu) website and then to provide and develop its services on the basis of the results.

The Controller shall determine **the scope of personal data processed** during surveys and questionnaires at its own discretion, while respecting the purpose limitation principle.

**Legal basis of data processing:** consent of the Data Subject in each case (Article 6 (1) (a) of the Regulation).

**Duration of processing:** The Controller will process the data provided until such consent is withdrawn, unless such data processing is required by law.

The Controller has the right to use the personal data provided in connection with the surveys and the questionnaires for research purposes or to request the Data Subject to participate in the research.

Processed data	Legal basis	Explanation	Retention period
Not predetermined, it is always determined by the topic of the given questionnaire or survey	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation)	The Controller intends to assess the satisfaction of Consumers (Data Subjects) at its own discretion by means of questionnaires or surveys uploaded to its website for the purpose of complying with the law, and to adapt its services to the needs based on the result.	Withdrawal of the consent of the Data Subject / statutory retention period

### 8.5. Data processing on the Recruitment Portal

The purpose of data processing on the Recruitment Portal is to search for potential employees of the Controller, as well as to register jobseekers, provide personalized services to jobseekers, to prepare and store a CV, and to inform jobseekers. The Data Subject provides data subject to enable the Controller to establish an employment relationship with them.

The Controller reserves the right to use all the data provided on the Recruitment Portal for the purpose of deciding on the application of the Data Subject and the possibilities thereof, to examine the Data Subject's suitability and to contact the Data Subject.

The data provided on the Recruitment Portal will not be used by the Controller for research and advertising purposes.

**Scope of processed data:** Data Subject's name, date of birth, e-mail address, telephone number, postal address, curriculum vitae, photograph, motivation letter and document certifying the qualifications of the data subject.

**Legal basis of data processing:** consent of the Data Subject in each case (Article 6 (1) (a) of the Regulation).

**Duration of data processing:** in principle, withdrawal of consent by the Data Subject.

The Controller processes the data provided on the Recruitment Portal for 12 months from the date of the last login; in the case of unconfirmed registration requests, the data processing period is 30 days.

The Data Subject has the right to delete their CV, and the Controller may also erase the registration on the Recruitment Portal.

Processed data	Legal basis	Explanation	Retention period
Data Subject's name, e-mail address, telephone number, postal address, curriculum vitae, motivation letter and document certifying the qualifications of the data subject	- Consent as legal basis (Article 6 (1) (a) of the Regulation)	In order to search for potential employees, to register job seekers, to provide personalized services to job seekers, to prepare and store a CV and to inform job seekers, the Controller has created a Recruitment portal.	Until the withdrawal of the Data Subject's consent / 30 days / 12 months

## 9. Other processing

### 9.1. Recording telephone conversations with customer service

The Controller operates a telephone customer service for administration relating to the water utility service, which also performs administrative tasks. In all cases, the Controller will record the conversation between the Data Subject and the customer service in audio format. During both incoming and outgoing calls, the Controller informs the Data Subject about recording the conversation, allowing the Data Subject to decide whether or not to consent to the recording of their conversation with the customer service. If the Data Subject decides not to consent to the recording of the telephone conversation, the Controller shall request the termination of the call and shall provide contact by email, post, online or in person at a customer service office.



**Purpose of recording a telephone conversation:**

- performing customer service tasks, assisting customers in administration,
- complaint handling,
- fulfilment of requests,
- quality assurance,
- use of the relevant recording in question in the case of a consumer dispute.

**Legal basis of data processing:** Consent of the Data Subject (Article 6 (1) (a) of the Regulation) and then, after the commencement of substantive administration proceedings, the statutory obligation of the Controller pursuant to the Consumer Protection Act (Article 6 (1) (c) of the Regulation) (Section 17/B of the Consumer Protection Act) is the legal basis for data processing.

**Duration of data processing:** The Controller shall retain the audio recording for 5 (five) years from the date of recording, after which it will be deleted from its system.

**Issuance of the audio recording:** Pursuant to Section 17/B (3) of the CLV Act 1997 on Consumer Protection, the Controller shall record the telephone conversation with the Data Subject and inform him or her about its obligation to retain and provide the recording, and provide the unique identification number during the call. Both parties have the right to access the audio recording of the conversation with the Data Subject, and the Controller shall ensure that the Data Subject can access the copy requested by the Data Subject within 30 days of becoming aware of the Data Subject's request free of charge, if the Data Subject has not yet submitted the same request to the Controller for the same call in the current year, and can listen to the audio recording at its Central Customer Service Office and that a copy is made of the recording on one occasion for each audio recording. The Controller shall, upon the Data Subject's request, make available a copy of the audio recording electronically. The Data Subject may exercise these rights jointly and individually.

The Controller shall provide the copy on CD or DVD to the Data Subject, together with a copy of the Privacy Notice and a copy of the record requesting the release of the recording.

The Data Subject may indicate the request for the release of the recording by citing the identification number using any of the Controller's customer service channels.

The Data Subject may only request the release of a voice recording of a conversation that took place between the Data Subject and a customer service employee.

Processed data	Legal basis	Explanation	Retention period
Phone call with customer support	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation) - <b>Statutory obligation as legal basis</b> (Article 6 (1) (c) of the Regulation) (Section § 17/B of the Consumer Protection Act)	The Controller shall record and process the audio recording of the conversation between the Data Subject and the customer service as provided in the applicable laws, primarily the Consumer Protection Act. The Data Subject will always be informed about the recording before the conversation begins.	For 5 years from the date of recording (Section 17/B (3) of the Consumer Protection Act)

**9.2. Recording of administration with the personal customer service**

The Controller may use audio recording at its customer service offices (headquarters and other branch offices/customer service points in Budapest and agglomeration) for recording the exact content of the administration, quality control, improving the quality of the quality assurance, and for preventing fraud and to be used in consumer protection or other dispute resolution procedure provided that the Data Subject has consented to it.

**Scope of processed data:** In order to properly identify the Data Subject, the following personal data may be requested: name, date and place of birth, mother's name, consumption address, device ID. The other content of the recording is not predetermined, it is always determined by the purpose and subject of the inquiry of the Data Subject.

**Legal basis of data processing:** consent of the Data Subject (Article 6 (1) (a) of the Regulation).

**Duration of data processing:** The Controller shall retain the audio recordings for 5 years from the time of the recording or until the Data Subject's consent is withdrawn. The Data Subject's consent may be revoked at any time, but it shall not affect the lawfulness of the processing prior to the revocation.

Processed data	Legal basis	Explanation	Retention period
<b>Audio recording of administration with the customer service</b>	<b>- Consent</b> (Article 6 (1) (a) of the Regulation)	Voice recording is necessary for our Company to record the exact content of the administration, to ensure quality, to increase the efficiency of quality control and to prevent fraud. Only employees who are involved in the administration of the subject matter of the recording and in the quality assurance of the customer service as well as in the control of the employees can have access to the recording.	5 years from the withdrawal of consent or the date of the audio recording.

**9.3. Data processing for marketing purposes**

If the Data Subject expressly consents to any marketing-related inquiry on any relevant interface, the Controller will use the personal data provided in the request in order to provide the Data Subject with information, promotions and offers informing them of the Controller's services. If the Data Subject consents thereto, the Controller will send advertising to the Data Subject by direct contact, and will use the data provided for this purpose. Consent applies to requests made by e-mail, telephone or post.

**Scope of processed data:** E-mail address, telephone number, postal address of the Data Subject, and their consent to the direct marketing request.

**Legal basis of data processing:** consent of the Data Subject in each case (Article 6 (1) (a) of the Regulation).

**Duration of data processing:** in principle, withdrawal of consent by the Data Subject. In the case of a newsletter, the Controller shall process the data of the Data Subject provided during the subscription to the newsletter, until the Data Subject unsubscribes from the newsletter using the

link in the newsletter or requests its removal from the list of subscribers to the newsletter by e-mail or by post. In the event of unsubscribing, the Controller will not contact the Data Subject with any further newsletters or offers.

Processed data	Legal basis	Explanation	Retention period
<b>E-mail address, telephone number, and postal address of the Data Subject</b>	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation)	Upon the consent of the Data Subject, the Controller shall provide the Data Subject information, promotions, offers about the services related to the water utility services of the Controller.	Until the purpose of processing is fulfilled/until the consent of the Data Subject is withdrawn

**9.4. Data processing for market research and public opinion polling purposes**

If the Data Subject expressly consents to any request for public opinion polling or market research through any relevant interface, the Controller may use the data provided by the Data Subject (name, email address, telephone number, postal address) to contact the Data Subject in order to compile an anonymous research sample that does not contain personal data. The data used for the purposes set out above shall be used by the Controller for statistical purposes in a manner not suitable for personal identification.

The Controller may be ordered by the Supervisory Authority (Hungarian Energy and Public Utility Regulatory Authority) to commission an independent opinion polling organisation on a regular basis to assess the level of satisfaction; in such a case, not the present Notice but the Authority's Privacy Notice will apply.

**Scope of processed data:** E-mail address, telephone number, postal address of the Data Subject, consent to request for opinion polling and market research, market research, contact list.

**Legal basis of data processing:** consent of the Data Subject in each case (Article 6 (1) (a) of the Regulation).

**Duration of data processing:** withdrawal of consent by the Data Subject.

The Data subject may at any time, without limitation and without justification, withdraw their consent to the processing of their personal data for this purpose. If the consent to the processing of personal data is withdrawn, the Controller will no longer contact the Data Subject for the purposes of market research and opinion polling through the provided contact details.

Processed data	Legal basis	Explanation	Retention period
<b>For the purpose of compiling market research, contact lists or statistical lists</b>	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation)	Sections 3 and 17 of Act CXIX of 1995 on the Use of Name And Address Information Serving the Purposes of Research and Direct Marketing creates a legal opportunity for the Controller, with the consent of the Data Subject, to conduct market research and produce contact lists based on anonymised personal data of the Data Subject for the purpose of public and market research.	Until the purpose of processing is fulfilled/until the consent of the Data Subject is withdrawn

**9.5. Extraordinary events – Damage events**

In the process of indemnification of damages caused to the Controller as an injured party (e.g. damages caused by third parties affecting operated, leased and own property, damages relating to meter and fire hydrant) and the Controller as the party causing the damage (e.g. interruption damage) it necessarily processes the personal data not only of the Data Subject who is in a contractual relationship with it, but also of third parties (e.g. party causing the damage, witness, expert, acting officer of the authority).

**Scope of processed data:** Data Subject’s name, mother's name, postal address, bank account number, insurer name, bond number, name of the acting officer of the authority, badge number, phone number, invoice, damage statement, damage record, damage file, expert opinion if possible.

**Legal basis of data processing:** consent of the Data Subject (Article 6 (1) (a) of the Regulation) or legitimate interest of the Controller or third party (Article 6 (1) (f) of the Regulation).

**Duration of data processing:** 5 years for documents of claims management, 8 years for issued invoices and transaction certificates.

**Data transfer:** documentation generated during claims management will necessarily be sent to competent insurers and insurance brokers to assess the claim. If justified by the complexity of the case, an expert official body may be involved.

Processed data	Legal basis	Explanation	Retention period
Data Subject’s name, mother’s name, postal address, bank account number, insurer name, bond number, witness name, address, name of acting officer of the authority, badge number, phone number, invoice, damage statement, damage record, damage file, expert opinion if possible	- <b>Consent as legal basis</b> (Article 6 (1) (a) of the Regulation) - <b>The legitimate interest of the Controller or of a third party as legal basis</b> (Article 6 (1) (f) of the Regulation)	The Controller, as the injured party or the party causing the damage, necessarily processes the personal data of third parties for the purpose of claims management.	- for a general limitation period of 5 years (Section 6:22 of Act V of 2013 on the Civil Code) - for a period of 8 years from the year in which the accounting document was issued (Section 169 of Act C of 2000 on Accounting)

**9.6. Property protection**

**9.6.1. Camera system**

The Controller shall be considered as a public body operating, in accordance with its statutory obligation, an electronic monitoring and recording system (hereinafter: camera system) on its premises, central office building and customer service, for the purpose of protecting property and critical infrastructure, prevention, detection and to prove infringements, caught infringers and to protect human life and physical integrity. The camera system does not record sound. The Controller shall comply with its obligation to provide information by means of a warning pictogram indicating the location of each camera.

**Scope of processed data:** An image of the Data Subject in the image recording.

**Legal basis of data processing:** necessary for the performance of the public interest task of the Controller (Article 6 (1) (e) of the Regulation).

**Processing time:**

- camera recordings not directly related to potable water or wastewater service have a retention period of 3 days,
- recordings related to the water utility service but not involving technological fields or areas – including recordings of customer service area and traffic routes – have a retention period of 30 days,
- recordings of technological fields and areas belonging to the patrol line of the armed security guards shall be retained for 60 days.

Processed data	Legal basis	Explanation	Retention period
<b>An image of the Data Subject in the image recording</b>	- <b>Execution of tasks of public interest as legal basis</b> (Article 6 (1) (e) of the Regulation)	The Controller shall process the image of the Data Subjects shown in the photos for the purpose of protecting property and critical infrastructure, protection of human life and physical integrity, prevention, detection and proof of violations, and catching infringers.	3 days/30 days/60 days

**9.6.2. Entry authorisation system**

The Controller operates an entry authorisation system at its premises. Guests visiting in relation to non-customer service issues may enter the Controller’s premises only with a guest card issued at the reception desk. The guest card entitles the applicant to single entry. The Controller shall provide its regular business partners with a regular entry partner card upon individual request.

**Scope of processed data:** Data Subject’s name, address, ID number, telephone number (in case of a partner card).

**Legal basis of data processing:** necessary for the performance of the public interest task of the Controller (Article 6 (1) (e) of the Regulation). In the case of a partner card, the Controller shall process the Data Subject’s phone number on the basis of consent (Article 6 (1) (a) of the Regulation).

**Processing time:** Once the guest card is returned to the reception desk, it loses its validity and will be erased from the entry authorisation system within 24 hours. Partner card details will be erased from the entry authorisation system 6 months after the partner card’s submission at the reception desk or its revocation.

Processed data	Legal basis	Explanation	Retention period
Data Subject’s name, address and ID number	- Execution of tasks of public interest as legal basis (Article 6 (1) (e) of the Regulation)	The Controller processes the data of the Data Subjects for the purpose of property and critical infrastructure protection.	up to 24 hours/6 months
Data Subject’s phone number in case of partner card	- Consent as legal basis (Article 6 (1) (a) of the Regulation)	The Controller processes the Data Subject's phone number for communication purposes.	Until the withdrawal of the Data Subject's consent/6 months

### 9.6.3. Entry permit to protected areas

The purpose of issuing an entry permit is to grant access to the Data Subject in certain designated areas of the protected areas. The entry permit is only valid together with a valid identity document provided on the application form. Entry permit to the Controller's protected areas may be requested by private individuals over the age of 14 who intend to enter or cross the area for private or touristic purposes. The entry permit is valid for the protected areas of Csepel Island, Balpart and Szentendre Island. The permit does not apply to the southern closed area of Szentendre Island and the operating areas.

**Scope of processed data:** Data Subject's name, e-mail address, ID number and signature.

**Legal basis of data processing:** necessary to comply with the Controller's legal obligation (Article 6 (1) (c) of the Regulation).

**Processing time:** The data will be processed in the year of application for the permit. If the given permit expires and is not renewed, the Controller shall erase the data from its system 6 months after the expiry of the permit. If the Data Subject requests the erasure of their data before the end of the 6 month period, the Controller shall take immediate action to erase it. In case of erasure, the permit will be revoked and will no longer be available.

Processed data	Legal basis	Explanation	Retention period
Data generated when applying for an entry permit to a protected area	-Statutory obligation as legal basis (Article 6 (1) (c) of the Regulation) (Section 9/B of Act CLIX of 1997 on Armed Security Guard Service and on Ranger and Rural Constable Services)	The Controller manages the following data of the Applicant: name, ID number, permanent address, postal address.	18 months from the date of receipt of the form.

### 9.7. Users to be protected (people with disabilities and socially disadvantaged persons)

The Controller shall keep records in order to provide benefits to the users to be protected, from which it shall be clearly established that the Data Subject is entitled to benefits for disabled persons and/or socially disadvantaged persons. Registration must be initiated by the Data Subject and the request must be accompanied by documents proving that the user is included among the users to be protected (as defined in Government Decree 58/2013 (27 February)). The registered Data Subject shall be required to demonstrate by March 31 of each year that their protection status is maintained, unless the Data Subject's attached medical opinion states that no significant change is expected. If the Data Subject is no longer entitled to the benefit or fails to verify eligibility thereto annually, their personal data will be erased from the register. The Controller shall notify the Data Subject of the erasure from the record within 8 days.

**Scope of processed data:** The name of the Data Subject and/or the person is in the same household, mother's name, the date and place of birth, the place of residence, the supporting documents of the body which establishes eligibility to benefits as a notary or protected user.

**Legal basis of data processing:** legal obligation of the Controller (Article 6 (1) (c) of the

Regulation).

**Duration of data processing:** 5 years after erasure from the record.

Processed data	Legal basis	Explanation	Retention period
Documents proving the user's protected status	-Statutory obligation as legal basis (Article 6 (1) (c) of the Regulation) (Section 61/A of the Act on Water Utility Supply)	The Controller shall keep records in order to guarantee the benefits to the users to be protected, from which benefits to which the Data Subject is entitled may be established clearly. Registration must be initiated by the Data Subject and the request must be accompanied by documents proving that the user is included among the users to be protected (as defined in the Government Decree).	Data erased from the records for 5 years from the date of erasure (Section 61/A(7) of Act CCIX of 2011 on Water Utility Supply)

**10. Data transfer, activities of data processors**

**10.1. Data transfer**

Data shall be transferred only with the consent of the Data Subject or the fulfilment of the contract or the authorisation of the law or in the legitimate interest of the Controller or the third party involved in the data transfer.

The Controller shall inform the Data Subject already at the time of entering into the contract, at the time of data collection and before the data transfer (if possible, necessary and reasonable) of the fact of the data transfer, its legal basis, purpose, any restrictions applied and the Data Subject's rights.

The Controller shall provide regular data to the bodies specified by law, at intervals and with content specified by law.

In the case of statutory ad-hoc data provisions (e.g. inquiries by investigation authorities, prosecutors, courts, national security services, notaries, tax authorities), the legal ground for processing is always verified and in case of any doubt, the assistance of a legal expert is sought.

In all cases, the acting, duly authorised body is responsible for the lawfulness of the data request, and the Controller has limited possibility and responsibility. The Controller excludes its liability for any damage to the Data Subject arising from the provision of official data.

Personal data will be transferred only if there is a clear legal basis, and the purpose and recipient to whom the data are transferred are clearly identified. In all cases, the transfer of data shall be documented in such a way as to prove its course and lawfulness.



In addition to the above, personal data will only be transferred by the Controller if the Data Subject has expressly consented to thereto. In the case of transfer of data subject to the consent of the Data Subjects, the Data Subject shall make their statement knowing the recipient and purpose of the transfer.

The Controller logs the data transfers in order to determine to whom, with what legal basis and for what purpose personal data is transferred. The data recorded in the electronic log shall be accessed and used solely for the purposes of checking the lawfulness of data processing, enforcement of data security requirements and conducting criminal proceedings. The above prohibitions and restrictions shall also apply in the event of termination of the customer relationship. The Controller reserves the right to assign its debts by assignment to a third party in accordance with the provisions of the Civil Code. The assignment will result in a change in the identity of the authorised person, and at the same time the Controller will transfer the details of the assignment to the person in the position of the authorised person.

The following table summarises the recipients of the Controller's regular data transfers, their respective legal grounds and their Data Subjects:

[Regular data transfers by Fővárosi Vízművek Zrt. >>](#)

## **10.2. Data processing**

The Controller reserves the right to use a processor in its activities on a permanent or ad hoc basis. Permanent data processing can be performed primarily for the purpose of administering the customer relationship, providing the services and maintaining the IT system. A data processor may only be used on the basis of a written contract. The rights and obligations of the data processor in relation to the processing of personal data shall be determined by the Controller within the framework of the applicable laws and regulations. The Controller is responsible for the lawfulness of the instructions regarding the data processing operations.

The Controller shall ensure that the rights of Data Subjects are not violated in the course of its data processing activities by establishing contractual terms and conditions providing guarantees, and the processor shall only have access to the personal data necessary for the performance of its task.

If the Controller has the opportunity to do so, they shall inform the Data Subjects about the data processors they have used and their activities performed while entering the data. Upon request, the Controller shall inform the Data Subjects, in addition to providing the relevant information, of the identity of the data processor and of the details of its data processing activities, in particular the operations performed and the instructions given to the data processor.

The range of data processors employed by the Controller is constantly changing.

In the framework of a long-term data processing assignment, Data Processor uses the following companies, persons as data processors:

[List of companies engaged in data processing activities for Fővárosi Vízművek Zrt. >>](#)

**11. Rights and remedies**

	<b><u>Rights</u></b>	<b><u>Explanation</u></b>
1.	<b>Information and access to personal data</b>	<p>The Data Subject has the right to know, control and have access to the personal data stored by the Controller and the information related to their processing (e.g. what is the purpose of processing, its legal basis, the date of erasing the data).</p> <p>If the Data Subject, after having been informed, disagrees with the data processing or the correctness of the data processed by the Controller, they may request the rectification, addition, erasure or restriction of the processing of their personal data, object to the processing of such personal data or have additional legal remedies.</p>
2.	<b>Right to rectify or complete personal data</b>	<p>The Data Subject has the right to contact the Controller and request the rectification of the inaccurate data without undue delay (e.g. name change, new phone number entered).</p>
3.	<b>Right to restriction of processing</b>	<p>The Data Subject has the right to request the Controller to restrict the processing of their data if:</p> <ul style="list-style-type: none"> <li>- the accuracy of the personal data is contested by the Data Subject, in which case the restriction related to the period during which the Controller can verify the accuracy of the personal data,</li> <li>- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead,</li> <li>- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims,</li> <li>- the Data Subject objects to the processing: in this case, the restriction applies to the period while it is verified whether the legitimate grounds of the Controller override those of the Data Subject.</li> </ul>

<p>4.</p>	<p><b>Right to erasure (right to be forgotten)</b></p>	<p>The Data Subject shall have the right to request from the Controller the erasure of personal data relating to them without undue delay if any of the specified reasons exist:</p> <ul style="list-style-type: none"> <li>- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Controller</li> <li>- the Data Subject withdraws consent on which the processing is based and there is no other legal ground for the processing,</li> <li>- the Data Subject objects to the processing for reasons related to their own situation and there are no legitimate grounds for the processing,</li> <li>- the Data Subject objects to the processing of personal data concerning them for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.</li> <li>- the Controller manages the personal data unlawfully;</li> <li>- the personal data have been collected in relation to the offer of information society services directly to children.</li> </ul> <p>The Data Subject may not exercise their right of erasure or to be forgotten if processing is required</p> <ul style="list-style-type: none"> <li>- for exercising the right of freedom of expression and information;</li> <li>- based on the public interest that relates to popular health,</li> <li>- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure would render impossible or seriously impair the achievement of the objectives of that processing; or</li> <li>- <i>for the presentation, enforcement or defence of legal claims.</i></li> </ul>
<p>5.</p>	<p><b>Right to data portability</b></p>	<p>The Data Subject has the right to obtain and further use their 'own' data, for their own purposes, provided by the Data Subject in the Controller's system. In all cases, the data provided by the Data Subject is restricted, and the portability of other data (e.g. statistics) is not possible.</p>
<p>6.</p>	<p><b>The Data Subject's right to object to the processing of personal data</b></p>	<p>The Data Subject has the right to object at any time to the processing of their personal data (e.g. profiling, direct marketing).</p>

The Controller will only be able to respond to a written request by e-mail or post. The Controller shall inform the Data Subject of the action taken without undue delay and **within 30 days** of receipt of any request. If the Data Subject has submitted the request electronically, the Controller will provide the information electronically, unless otherwise requested by the Data Subject.

If the Data Subject's request is manifestly unfounded or excessive (in particular due to its repetitive character), the Controller may charge a reasonable fee for complying with the request or refuse to act. The Controller shall bear the burden of demonstrating this. If the Controller has doubts about the identity of the natural person who submitted the request, they may request additional information necessary to confirm the identity of the applicant.

The Data Subject may also directly address the data protection officer of the Controller with any general questions relating to data protection: **Károly Gróf**, phone number: 06 1 465 2400; e-mail: [adatvedelem@vizmuvek.hu](mailto:adatvedelem@vizmuvek.hu); Postal address: Fővárosi Vízművek Zrt. 1397 Budapest, PO Box 512.

With regard to the lawfulness of the processing of the Data Subject's personal data by the Controller, the **Hungarian National Authority for Data Protection and Freedom of Information** (abbreviated as NAIH in Hungarian; registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/c., postal address: 1534 Budapest, PO Box: 843, website: [www.naih.com](http://www.naih.com), phone: +36 (1) 391-1400, fax: +36 (1) 391-1410, central e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)), may initiate proceedings or apply to the **court** of their place of residence ('**right to remedy**').

Within five years of the Data Subject's death, the rights of the deceased in their life (see above) shall be enforced by the person authorised by the Data Subject in the administrative order, or in a deed or a private document of full probative force, made by the Controller. If the Data Subject has not made such a declaration, their close relative under the Civil Code is entitled to assert the rights of the deceased within five years of the Data Subject's death. The person asserting the rights of the Data Subject may prove the fact and time of the death of the Data Subject by means of a death certificate or court decision and their identity – and the status of a close relative – by a public document.

The Controller shall be liable for any damage caused to Data Subject as a result of unlawful processing of the data of the Data Subject, violation of their personality rights or violation of data security requirements. In the event of a violation of their personality rights, the Data Subject may claim restitution in accordance with the provisions of the Civil Code. The Controller shall not be liable for any damage resulting from the failure of the Data Subject to comply with the change notification obligation of the Data Subject with regard to personal data, and the Data Subject shall be solely liable for it.

## **12. Data security, storage and retention of personal data**

The Controller shall take all reasonable measures required of it to ensure the security of the data, to ensure an adequate level of protection, to prevent unauthorised access, alteration, transfer, disclosure, erasure or destruction, and to prevent accidental destruction or damage.

The Controller selects and operates IT tools for processing personal data which guarantee that the processed data is accessible only to authorised persons (availability), the authenticity of the data is ensured (authenticity of processing), the integrity is verified (data integrity), and protected against unauthorised access (data confidentiality). All IT systems used by the Controller during the management, processing and recording of personal data are accessible only to authorised data processing employees, thus ensuring the integrity of the data

All IT systems used by the Controller during the management, processing and recording of personal data are accessible only to authorised data processing employees, thus ensuring the integrity of the data.

Massive data processing tasks in the Controller's internal business system require robotic, new innovative processing technology that is capable of replacing live human resources and, at least partially, results in automated processing. Robotic processing by Controller is not aimed at profiling that involves the Data Subject.

The Controller may receive, under individual contract, hot and cold water meter readings in condominium remote reading meter systems in its service area, and the measured data read in the Data Subject's system as a result of automated data processing may be transferred for invoicing to Díjbeszedő Holding Zrt, and the measuring data of the hot water sub-meter for the Budapesti Távhőszolgáltató Zrt.

Depending on the outcome of a data protection impact assessment performed prior to the use of robotic technologies and the operation of the remote meter reading system, the Controller will decide on their applicability.

The Controller shall also ensure the security of the data by appropriate organisational measures.

Unless there is a risk to the rights and freedoms of natural persons, the Controller shall inform the Data Subject and the Supervisory Authority without undue delay, but within 72 hours the latest of the occurrence of a personal data breach. The Controller shall keep records for the purpose of monitoring the personal data breach measures as well as informing the supervisory authority and the Data Subject, which contains the personal data affected by the personal data breach, the scope and number of data subjects, the date, circumstances, effects and measures taken to rectify the personal data breach.

The Controller, as a public service company, is subject to the regulations on the protection of archival material. Documents created by the Controller pursuant to Act LXVI of 1995 on Public Documents, Public Archives and Protection of Private Archive Materials are public documents, the retention of which is governed by the referenced Act, regulations for the filing system issued under the act, and the archival plan.

The Controller will keep records of the archival material in accordance with the applicable rules even if the purpose of processing the personal data in the documents has otherwise ceased to exist. In this case, the legal basis for processing is the legislation on archival material.

The Controller shall, upon request, provide detailed information on the rules governing the preservation of archival material to Data Subjects.

### **13. Key legislation relevant to the Company's activities**

- Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC (General Data Protection Regulation)
- Act XLV of 1991 on Legal Metrology
- Act LVII of 1995 on Water Management
- Act LIII of 1995 on the General Rules of the Protection of the Environment
- Act LVII of 1996 on the Prohibition of Unfair Trading Practices and Unfair Competition
- Act XXXI of 1997 on the Protection of Children and the Administration of Guardianship
- Act CLIV of 1997 on Health Care
- Act CLV of 1997 on Consumer Protection
- Act C of 2000 on Accounting
- Act LXXXIX of 2003 on Environmental Load Charges

- Act XLVII of 2008 on the Prohibition of Unfair Business-to-Consumer Commercial Practices
- Act LXXVI of 2009 on the General Rules of the Commencement and Performance of Service Activities
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information
- Act CXC of 2011 on Public Education
- Act CCIX of 2011 on Water Utility Services
- Act V of 2013 on the Civil Code
- Act CLXXXVIII of 2013 on the Uniform Invoice Layout to be Used by Public Service Operators
- Act LIV of 2013 on the Implementation of Utility Cost Reductions
- Act XXII of 2013 on the Hungarian Energy and Public Utility Regulatory Authority
- Act IX of 2016 on the Collection of Flat Rate
- Government Decree 72/1996 (22 May) on Rights and Duties of the Water Authority
- Decree of the Minister of Industry, Trade and Tourism 78/1997 (30 December) IKIM establishing the fees payable for the use of metering administrative services
- Government Decree 19/2009 (30 January) on the implementation of Act XL of 2008 on Natural Gas Supply
- Government Decree 123/1997 (18 July) on the Protection of water resources, long-term water resources and water facilities for the supply of drinking water
- Government Decree 58/2013 (27 February) on the implementation of certain provisions of Act CCIX of 2011 on Water Utility Services
- Government Decree 127/1991 (9 October) on the implementation of the Act on Metrology
- Government Decree 201/2001 (25 October) on drinking water quality requirements and inspection procedures
- Decree of the Minister of Environment and Water 28/2004 (25 December) KvVM on limit values for discharges of water pollutants and certain rules for their application
- Government Decree 220/2004 (21 July) on the rules of protecting the quality of surface waters
- Government Decree 253/1997 (20 December) on national settlement and construction requirements
- Bylaw of the Council of Budakeszi Local Government 21/2015 (5 August) on the public service for the collection of domestic wastewater not collected by public utilities
- Bylaw of the Council of Biatorbágy Local Government 10/2015 (28 May) on the public service for the collection of domestic wastewater not collected by public utilities
- Bylaw of the Council of Tököl Local Government 8/2015 (29 May) on the public service for the collection of domestic wastewater not collected by public utilities
- Bylaw of the Council of Pócsmegyer Local Government 11/2016 (6 September) on the public service for the collection of domestic wastewater not collected by public utilities
- Bylaw of the Council of Szigetmonostor Local Government 15/2016 (22 July) on the amendment of bylaw 12/2016 (04 July) on the public service for the collection of domestic wastewater not collected by public utilities
- Decree of the Minister of Environment and Water 27/2005 (6 December) KvVM on the detailed rules for controlling the discharge of used and wastewater

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#### **14. Miscellaneous provisions**

The Controller reserves the right to unilaterally modify this Privacy Notice without prior notice to the Data Subjects via the Website.

This Privacy Notice is in effect from 14 February 2020.

**Fővárosi Vízművek Zrt.**