

General Privacy Policy Information

Short extract

1. Introduction

Fővárosi Vízművek Zártkörűen Működő Részvénytársaság (Waterworks of Budapest Private Company Limited by Shares) (registered seat: 1138 Budapest, Váci út 182., company registration number: 01-10-042451; websites: <https://www.vizmuvek.hu>; <https://ugyfelszolgalat.vizmuvek.hu/>; <https://vizallovedelem.hu>; **hereinafter: Company/Data Controller**) devotes special attention so that its activities comply with the effective statutory requirements, especially with those laid down in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (**General Data Protection Regulation/GDPR**) (**hereinafter: Regulation**), with the expectations and practices required vis-a-vis and from the water utility service providing sector.

The Data Controller intends to ensure transparency of its data processing activities by issuing this shortened and printable Privacy Policy Information (hereinafter: Information) and by provisions laid down in its related internal policies and regulations, and at the same time inform its customers, applicants and those interested or other natural persons (**hereinafter: Data Subjects**) of the opportunities provided by their right of self-determination and freedom of information.

A more detailed Privacy Policy Information is available at the following link on the Data Controller's website: <https://www.vizmuvek.hu/en/data-protection>

Contact details of the data protection officer appointed by the Data Controller: Károly Gróf; phone number: 36 1 465 2400; e-mail: adatvedelem@vizmuvek.hu; Mailing address: Budapest Waterworks Co. Ltd. 1397 Budapest, Pf. 512.

Structure of this Information:

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2. Scope of application of the Information

The scope of application of this Information extends to

- data processing activities pursued by the Company as a public utility service provider, and
- data processing activities carried out by the Company not as a public utility service provider;
- services provided and data processing activities performed in association with the websites <https://www.vizmuvek.hu>; <https://ugyfelszolgalat.vizmuvek.hu>; <https://www.vizallovedelem.hu> operated by the Company, excluding the website related to the WaterPlus Card (www.vizpluszkartya.hu);
- data processing performed by the Company for marketing, market research and opinion poll purposes, as well as data processing activities related to extraordinary events and damage incidents;
- data processing activities related to property and asset protection performed by the Company concerning the Data Subjects (Section 8.4.) and data processing concerning the data of persons being in other contractual relationship with the Company.

Unless otherwise provided, the scope of application of the Information does not extend to

- services or data processing activities associated with the services, other campaigns of and content published by third parties eventually advertising or appearing in any other way on the Website;
- services and data processing activities of websites or service providers, to which links placed on this Website lead.

3. Purpose of the data processing

The primary purpose of data processing by the Data Controller in association with the fulfilment of its task in the public interest is the performance, establishment and maintenance of contracts concluded with its Customers and providing service at an appropriate quality level, with special regard to the provisions of Act CCIX of 2011 on water public utility service (hereinafter: Vksztv.) and those laid down in Government Decree no. 58/2013. (II. 27.) on the implementation of certain provisions of Act CCIX of 2011 on water public utility service (hereinafter: Vhr.). The Data Controller processes personal data only for the purpose they were requested.

The following purposes may serve as grounds for data processing by the Data Controller:

- conclusion of a contract with the Customer;
- providing service on the basis of the contract concluded with the Customer, and for this reason, identification of the delivery point, examination and making the delivery point suitable for service provision;
- determining eligibility for the service;
- keeping record on protected user status and processing of special personal data providing grounds for it;
- metering of the service provided to the Customer, ensuring the service quality and meeting the service volume requirements;
- metering the service item and reading the consumption meter;
- determining payment liabilities, billing and management of receivables;
- identification of Customers, Applicants, Interested parties and other Data Subjects;
- keeping contact with Customers, Applicants, Interested parties and other Data Subjects, management, registration and investigation of their complaints, reports and requests;

- enforcement of claims deriving from a legal relationship;
- direct marketing, market research and opinion polls;
- on-line customer service via the Website;
- enhancement of the Website.

4. Processing of personal data by main types of the Data Subjects

The following types of natural persons may characteristically be Data Subjects of personal data processed in association with the Data Controller's activities:

- **Customer** (a natural person who concludes a contract with the Data Controller for the provision of public utility and/or not a public utility service)
- **Registered user** (a natural person who has registered him/herself on the Website)
- **User not having registered on the Website** (a natural person who has contacted the Company on the Website without registration)
- **Applicant** (a natural person who enters into contact with the Data Controller for the purpose of using a service, but the contractual relation for delivery of the service will be established later or will not be established at all)
- **Other Data Subject** (a natural person who visits the Website, and/or subscribed for the Data Controller's newsletter, and/or is a party affected by a damage incident, and/or who wishes to enter the premises of the Data Controller)
- **Data of natural persons other than Customers** (a natural person who is the *owner* registered in the property records for the delivery point, or a natural person who acts as *representative* in representation of a natural person or a legal entity as provided for in Section 6:11 of the Civil Code)

5. Data processing activities in relation to the public service contract

Personal data of the Data Subjects may get into the Data Controller's possession in the following ways: Primarily by an act of the Data Subject to make them available directly in order to establish and perform the contract, secondly, in the course of data capturing from the Data Subject (by phone/customer service) and thirdly, by data transmission by the data processor entrusted by the Data Controller to keep contact with the Data Subject.

The Table below summarizes the type of data processed by the Data Controller in association with the fulfilment of its task in the public interest, together with the relevant legal bases and retention periods related to them:

	Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
5.1.	Natural identification data of the Applicant (name, address, mother's name, place and date of birth)	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The Data Controller processes the Customer's data in order to be able to identify him/her properly.	For 8 years following the year in which the last accounting document was issued in relation to the contract (Article 169 of Act C of 2000 on Accounting (hereinafter: Sztv.))

5.2.	Data of the owner of the delivery point	Legal basis based on contract (Article 6 (1) b) of the Regulation)	Primarily the data of the owner of the delivery point may be processed pursuant to Article 2, point 6 of the Vksztv. If the conclusion of the contract or the provision of the service is not possible without the provision of the actual owner's data, the owner's personal data will be processed by the Data Controller.	For 8 years following the termination of the contractual legal relationship.
5.3.	Data of the owner of the delivery point	Legitimate interest as legal basis (Article 6 (1) f) of the Regulation)	The Data Controller processes the data of the owner of the delivery point on the basis of his/her underlying liability as provided for in Article 2 point 6 of Vksztv., for the purpose of recovering receivables.	With a view to the provisions of Section 5.2., for 8 years following the termination of the contractual legal relationship/until a decision is made by the Data Controller upon objection by the Data Subject.
5.4.	Natural identification data of the Applicant (name, address, mother's name, place and date of birth)	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The Data Controller processes the Applicant's data in order to be able to identify the Applicant properly.	For 3 year from receipt of the form.
5.5.	Technical data related to the Data Subjects' property	Legitimate interest as legal basis (Article 6 (1) f) of the Regulation)	Such data are captured for recording the technical data related to water supply and sewage services in properties located in our service area. (E.g.: service pipe connection drawing, internal water network drawing, certificate of ownership and data concerning the planned water demand)	Until the expiry of the validity of the Data Controller's Operator license/until a decision is made by the Data Controller upon objection by the Data Subject.
5.6.	Phone number and e-mail address necessary for keeping contact	Consent as legal basis (Article 6 (1) a) of the Regulation)	If the Data Subject or the representative of the community – thus especially the house representative – grants	Until withdrawal of the consent/for 6 months following the

	with the Data Subject		his/her consent, the Data Controller will manage his/her phone number and e-mail address for keeping contact.	termination of the established contractual legal relationship.
5.7.	Phone number and e-mail address necessary for keeping contact with the Data Subject	Legitimate interest as legal basis (Article 6 (1) f) of the Regulation)	In the case of data necessary for contact keeping, the Data Controller may manage phone numbers for purposes other than the original purpose of the data processing, in order to coordinate the date and time of work to be accomplished on the site, or even for the purpose of recovering eventual arrears from the Data Subject or preventing accumulation of debts.	For 6 months following the termination of the contractual legal relationship/until a decision is made by the Data Controller upon objection by the Data Subject.
5.8.	Data concerning the Data Subject's consumption and the provision and use of the service	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The processing of such data is closely interrelated with the performance of the contract. The Data Controller manages and processes data generated in the course of the performance of the contract, with special regard to bill data, requests and claim reports received from the customer, documents, minutes and protocols drawn up in the course of service provision.	For 8 years following the termination of the contractual legal relationship.
5.9.	Data Subject's complaint in relation to service provision and usage	Statutory obligation as legal basis (Article 6 (1) c) of the Regulation) (Article 17/B. (5) of the Fogytv.)	Processing of such data is closely interrelated with consumer protection legal regulations and with the performance of the contract, therefore, the Data Controller manages and processes the complaints raised in order to comply with its statutory obligations.	For 5 years, pursuant to Section 6:22. (1) of the Act V of 2013 on the Civil Code (hereinafter: Civil Code).
5.10.	Data concerning fees and costs payable and paid by the Data	Legal basis based on contract	The Data Controller manages and processes all the data that are related to the Data Subject's payment	For 5 years pursuant to Section 6:22 (1) of the Civil Code.

	Subjects, data on receivables	(Article 6 (1) b) of the Regulation)	liability and based on which it can be established whether the Data Subject has met or failed to meet his/her payment liability.	
5.11.	Data required for proving a change of consumer	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The Data Controller manages and processes a copy of the deed/document required to prove the change (e.g. purchase and sale contract, contract of donation, lease contract). The Data Subject has the right to delete (cover) the data from/in the copy, which are not necessary for proving the change of consumer.	For 8 years following the termination of the contractual legal relationship.
5.12.	Copy of and data contained in deeds serving for substantiating a legal relationship	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The Data Controller makes a copy of deeds serving for proving certain legal relationships/legal statuses (such as: certificate of civil status, certificate of ownership, protocol on transfer into possession, owner's consent, resolution of a Municipality) in order to verify data accuracy and determine the existence of a legal relationship. Identity-card type personal documents are an exception to this rule, the Data Controller does not make copy of such documents.	For 8 years following the termination of the contractual legal relationship.
5.13.	Identification data of the delivery point and the metering devices	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The Data Controller manages and processes technical and technological data related to the delivery point and the metering devices and assigns them to the Data Subject, such as the manufacturing number, the device point number,	After 8 years have lapsed from the date of termination of the public service contract, the correlation between the Data Subject and the identification data will be

			the VIPAK seal number and its expiry.	terminated. The data concerning the delivery point and the technical data of the metering devices will not be erased themselves, they will be retained until the expiry of the validity of the Data Controller's Operator license.
5.14.	GPS coordinates of the delivery point and the metering devices	Legitimate interest as legal basis (Article 6 (1) f) of the Regulation)	Based on its legitimate interest, the Data Controller makes photos of the metering devices and technical facilities in the course of reading the metering devices and technical investigations, at the occasion of which it also captures data on the GPS coordinates of the metering device.	After 8 years have lapsed from the date of termination of the public service contract, the correlation between the Data Subject and the data on the delivery point will be terminated. The data concerning the delivery point and the GPS coordinates of the metering devices will not be erased themselves, they will be retained until the expiry of the validity of the Data Controller's Operator license.
5.15.	Data of natural persons involved in acting on the basis of a power of attorney or as representative	Legal basis based on contract (Article 6 (1) b) of the Regulation)	In such a case the data of the person authorised to proceed in administrative matters related to the public service may be processed. The Data Subject will provide the	During the validity term of the power of attorney and the authorisation for acting as representative/ for 5 years, as

			following data as a minimum content requirement: name, place and date of birth, mother's name, address and signature.	provided for in Section 6:16 of the Civil Code.
5.16.	Phone conversation with the Call Centre	Statutory obligation as legal basis (Article 6 (1) c) of the Regulation) (Article 17/B. of the Fogytv.)	The Data Controller records and processes the voice recording made of the phone conversation between the Data Subject and the Call Centre in compliance with the requirements prescribed by the relevant statutes – primarily by the Act on consumer protection.	For 5 years from the date of the voice recording (Article 17/B. (3) of the Fogytv.).
5.17.	Voice recording on a conversation and administration at a personal customer care point	Consent as legal basis (Article 6 (1) a) of the Regulation)	Voice recording is necessary for our Company for the purpose of recording the precise content of the arrangement/administration, quality assurance, improving the efficiency of quality control and preventing misuse of powers and rights.	Withdrawal of the consent/for 5 years from the date of the voice recording.
5.18.	Data generated in the course of entry into contact with the Customer Service	Statutory obligation as legal basis (Article 6 (1) c) of the Regulation) (Article 89/C. (1) of the Vhr.)	The Customer Service manages and processes the data generated in the course of the relation between the Data Subjects and the Customer Service for the purposes of arranging/administering the matters that have arisen.	For 5 years pursuant to Section 6:22 (1) of the Civil Code.
5.19.	Deeds proving a user status to be protected	Statutory obligation as legal basis (Article 6 (1) c) and Article 9 (2) b) of the Regulation) (Article 61/A. of the Vksztv.)	In order to ensure the discounts/allowances for which the protected users are eligible, the Data Controller keeps records, from which it can be clearly established to which of the discounts/allowances the data subject is entitled. The Data Subject must initiate his/her registration in the	The data deleted from the records, for 5 years from the date of deletion (Article 61/A. (7) of Act CCIX of 2011 on water public utility service)

			records and he/she has to attach to his/her application the documents proving that he/she belongs to the scope of protected users defined in Government Decree 58/2013. (II.27.).	
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6. Other data processing activities not related to public service contract

The Table below summarizes the types of data managed and processed by the Data Controller not directly in relation to the fulfilment of a task in the public interest but in association with the provision of other services (e.g.: laboratory services, water pipe fitting service, watertight protection, detection of pipe bursts, measurement of the water yield of fire hydrants, lease of properties) or other financial transactions (e.g.: issuance of bills), as well as the relevant legal bases and retention periods related to them:

	Scope of the data managed	Legal basis	Purpose of the data processing	Retention period
6.1.	Applicant's data (name, address, mother's name, place and date of birth)	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The Data Controller manages such data for the purpose of identifying the Customer properly and preparing an offer for him/her.	For six months from the date of placement of the order, if the contract fails to be established.
6.2.	Customer's data (name, address, mother's name, place and date of birth)	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The Data Controller manages such data for the purpose of identifying the Customer properly and making out bills for him/her.	For 8 years following the year when the last accounting document was issued under the relevant contract (Article 169 of the Sztv.)
6.3.	Phone number and e-mail address necessary for keeping contact with the Data Subject	Consent as legal basis (Article 6 (1) a) of the Regulation)	If the Data Subject or the representative of a community – thus especially the house representative – grants his/her consent, the Data Controller will manage his/her phone number and e-mail address for keeping contact.	Until withdrawal of the consent/for 6 months following termination of the established contractual legal relationship.
6.4.	Data of natural persons involved in acting on the basis of a power of attorney or as representative	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The data of the person authorised by power of attorney will be primarily managed and processed for the purpose of	During the validity term of the power of attorney and the authorisation for acting as

			arranging/administering the service requested.	representative/ for 5 years, as provided for in Section 6:16 of the Civil Code.
6.5.	Data concerning the provision and use of the service concerned	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The processing of such data is closely interrelated with the performance of the contract. The Data Controller manages and processes the data generated during the performance of the contract, thus especially the form in which the service request has been submitted, the order form, the job card and the performance certificate.	For 8 years following the termination of the contractual legal relationship.
6.6.	Data Subject's complaint in relation to service provision and usage	Statutory obligation as legal basis (Article 6 (1) c) of the Regulation) (Article 17/A. (6) of the Fogytv.)	Management and processing of such data is closely interrelated with consumer protection legal regulations and with the performance of the contract, therefore, the Data Controller processes the complaints raised in order to comply with its statutory obligations.	For 5 years pursuant to Section 6:22 (1) of the Civil Code.
6.7.	Data concerning fees and costs payable and paid by the Data Subjects, data on receivables	Legal basis based on contract (Article 6 (1) b) of the Regulation)	The Data Controller manages and processes all the data that are related to the Data Subject's payment liability and based on which it can be established whether the Data Subject has met or failed to meet his/her payment liability.	For 5 years pursuant to Section 6:22 (1) of the Civil Code.
6.8.	Data generated in the course of entry into contact with the Customer Service	Statutory obligation as legal basis (Article 6 (1) c) of the Regulation) (Article 89/C. (1) of the Vhr.)	The Customer Service manages and processes the data generated in the course of the relation between the Data Subjects and the Customer Service for the purposes of arranging/administering	For 5 years pursuant to Section 6:22 (1) of the Civil Code.

			the matters that have arisen.	
6.9.	Phone conversation with the Call Centre	Statutory obligation as legal basis (Article 6 (1) c) of the Regulation) (Article 17/B. of the Fogytv.)	The Data Controller records and manages the voice recording made of the phone conversation between the Data Subject and the Call Centre in compliance with the requirements prescribed by the relevant statutes – primarily by the Act on consumer protection.	For 5 years from the date of the voice recording (Article 17/B. (3) of the Fogytv.).
6.10.	Voice recording on a conversation and administration at a personal customer care point	Consent as legal basis (Article 6 (1) a) of the Regulation)	Voice recording is necessary for our Company for the purpose of recording the precise content of the arrangement/administration, quality assurance, improving the efficiency of quality control and preventing misuse of powers and rights.	Withdrawal of the consent or for 5 years from the date of the voice recording.

7. Data processing activities associated with the Websites operated by the Company

(<https://www.vizmuvek.hu>; <https://ugyfelszolgalat.vizmuvek.hu/>;
<https://www.vizalovedelem.hu>)

A separate Privacy Policy Information has been drawn up concerning the management of cookies used on our Websites, which is accessible from the following site: https://www.vizmuvek.hu/hu/jogi_nyilatkozat

7.1. Data processing activities at the on-line Customer Service

The Data Controller operates an on-line customer service as an electronic service for its Customers. The purpose of the on-line customer service is to ensure reception of electronic inquiries from the Customers and display contract-related data for registered Customers. In case of inquiries initiated with or without registration the personal data provided will be assigned in the Company's central database to the Data Subject being in a public service or other contractual legal relationship with the Company and later on the legal bases, data processing purposes and retention periods specified in Chapters 5 and 6 will be governing for such personal data.

7.1.1. Registration

There are four ways available for the Data Subjects for initiating registration for the purpose of using the on-line administration services: registration by using Client Gateway (Ügyfélkapu) data, registration other than by using Ügyfélkapu data, pre-registration, registration combined with arrangement/administration of a matter.

Purposes for which the data stored in the Data Controller's system and related to a registration are used:

- log in the on-line customer service, identification of the Data Subject, provision of services offered by the on-line portal;
- provision of services subject to registration to the on-line customer service, such as, among others: sending e-mail notifications about the reading reporting periods, issuing bills, notifications about the date and time of on-the-spot work accomplishment, confirmation on the launching of an administration process;
- sending notifications about changes made to and opportunities offered by the on-line customer service.

Storage and access to the data managed:

The Data Controller assigns the data provided in the course of the registration to the data of the Data Subject being in an identified public service legal relationship with it, or managed under other, non-public service legal relationship and will manage and process them as defined in Chapters 5 and 6.

The data provided under the registration process will be processed by the Data Controller and will not be transmitted to any data processor or other data controllers. Only persons – especially agents and employees – acting on behalf of the Data Controller will have access to the data, who need to know them in order to fulfil their duties, and who are aware of their obligations with regard to managing such data.

Scope of the data managed	Legal basis	Purpose of the data processing	Retention period
Name, e-mail address and phone number of the registering Data Subject	Consent as legal basis (Article 6 (1) a) of the Regulation)	Log in the on-line customer service, appropriate identification of the Data Subject, provision of services offered by the on-line portal.	Until withdrawal of the Data Subject's consent, until his/her registration is cancelled.
In case of pre-registration, the name and e-mail address of the Data Subject	Legitimate interest as legal basis (Article 6 (1) f) of the Regulation)	To ensure the provision of the services offered by the On-line Customer Service, by simplifying the registration process.	Failing confirmation, the Data Subject's pre-registration will be automatically deleted after 30 days have lapsed.

In case of registration with Ügyfélkapu data, the Data Subject's customer ID number	Consent as legal basis (Article 6 (1) a) of the Regulation)	Appropriate identification of the Data Subject by NISZ Zrt. in the framework of the central electronic administration services (KEÜSZ). During the registration, the system fills in the data automatically for the Data Subject's mother's name, date and place of birth on the Website, in order to properly identify him/her.	Until withdrawal of the Data Subject's consent, until his/her registration is cancelled.
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7.1.2. Management of inquiries not involving registration

The data provided in the course of inquiries launched without and not resulting in registration will be captured in the Company's central database. If the report in question can be assigned to an existing or a newly contracting Data Subject as far as its subject-matter is concerned, in that case, the report will be assigned in the central database to the Data Subject being in the corresponding public service legal relationship or in other, non-public service contractual relationship with the Data Controller and will be further managed and processed as defined in Sections 5 and 6. If the report in question cannot be assigned, as far as its subject-matter is concerned, to any contracted Data Subject, in that case it will be further managed and processed according to the provisions of Section 6. A confirmation e-mail will be sent about the successful report to the e-mail address provided at the occasion of making the report, but the e-mail address provided will not be used further in the future by the Data Controller.

Scope of the data managed	Legal basis	Purpose of the data processing	Retention period
E-mail address, meter index and photo provided at the occasion of meter index reporting	Legal basis based on contract (Article 6 (1) b) of the Regulation)	In case of meter index reporting, after the Data Subject has been identified properly, the management and processing of the meter index and the photo is closely interrelated with the performance of the contract, by metering the service item and by reading the consumption on the basis of Articles 61-63 of the Vhr.	For 8 years following the termination of the contractual legal relationship.
Report at the on-line customer service and the e-mail address and phone number provided at the occasion of the reporting	Statutory obligation as legal basis (Article 6 (1) c) of the Regulation) (Article 89/C. (1) of the Vhr.)	The On-line Customer Service manages and processes the data generated in the course of the relation between the Data Subjects and the Customer Service for the purposes of arranging/administering the matters that have arisen. In this case the data processing is closely interrelated with the procedure	For 5 years pursuant to Section 6:22 (1) of the Civil Code.

		launched by the Data Subject, as well as with the contract, the performance of the contract and meeting the statutory obligations, on the basis of Article 89/C. of the Vhr.	
Device point ID of the Data Subject's meter, e-mail address and phone number	Legal basis based on contract (Article 6 (1) b) of the Regulation)	In case a procedure is launched, after having identified the Customer with the meter ID data, satisfying the contents of the request/report is closely interrelated with the performance of the contract.	For 8 years following the termination of the contractual legal relationship.
Data Subject's e-mail address, date and time of the appointment to the customer service	Consent as legal basis (Article 6 (1) a) of the Regulation)	The Data Controller will use and manage the e-mail address provided exclusively for sending a confirmation e-mail about the date and time of the appointment, confirmation on success of cancellation of the appointment if made so, notification of the Data Subject about the closing hours of the customer care point and on the deletion of the appointment reserved.	Until withdrawal of the Data Subject's consent/until the date of the appointment to the customer service.

7.1.3. Management of registered inquiries

The Data Controller will manage and process the data provided at the on-line customer service for reporting a request or for launching an administration process, as defined in Chapters 5 and 6.

7.2. Data processing in relation to surveys and questionnaires concerning the Data Controller

Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
The Data Subject's e-mail address, phone number and mailing address	Consent as legal basis (Article 6 (1) a) of the Regulation)	Surveying Customer (the Data Subjects') satisfaction and adapting the services offered by the Data Controller to the needs and expectations on the basis of the result of the survey.	Until withdrawal of the Data Subject's consent.

7.3. Data processing activities on the Recruitment portal

Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
The Data Subject's name, e-mail address, phone number, postal address, CV, photo, motivation letter, and the document(s) certifying his/her qualification.	Consent as legal basis (Article 6 (1) a) of the Regulation)	The Data Controller has set up a Recruitment portal for the purposes of searching for potential employees, keeping records about the job-seekers, providing tailored services for the applicants, storing CVs, sending notifications to the applicants.	Until withdrawal of the Data Subject's consent/for 30 days/12 months.

7.4. Entry into contact by way of an on-line form

There is an opportunity for the Data Subject to enter into contact with the Data Controller via its Website and to initiate the ordering of various services, enrol for participation at certain events, and for using that opportunity he/she has to fill in an on-line form in order to enter into contact with the Data Controller.

Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
Name, e-mail address and phone number of the Data Subject	Consent as legal basis (Article 6 (1) a) of the Regulation)	The Data Subject is to provide the data requested on the on-line form serving for entry into contact with the Data Controller.	Until withdrawal of the Data Subject's consent/for 8 years/6 months.

8. Other special data processing activities

8.1. Data processing for marketing purposes

Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
The Data Subject's e-mail address, phone number and mailing address	Consent as legal basis (Article 6 (1) a) of the Regulation)	forwarding of information leaflets, offers and information about campaigns related to the Data Controller's	Until withdrawal of the Data Subject's consent.

		services to the Data Subject.	
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8.2. Data processing for market research and opinion poll purposes

Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
The Data Subject's e-mail address, phone number and mailing address	Consent as legal basis (Article 6 (1) a) of the Regulation)	If the Data Subject has granted his/her consent to the processing of his/her data for opinion poll and market research purposes, the Data Controller will use the Data Subject's provided data (name, e-mail address, phone number and mailing address) for setting up an anonymous research sample that does not include personal data.	Until withdrawal of the Data Subject's consent.

8.3. Extraordinary events – Damage incidents

Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
Name, mother's name, mailing address, bank account number of the Data Subject, name of the insurance company, insurance policy number, name and address of the witness(es), name, badge number, phone number of the person proceeding on behalf of the authority, invoice, tortfeasor's declaration, protocol drawn up on the damage,	Legitimate interest as legal basis (Article 6 (1) f) of the Regulation)	It is inevitable that the Data Controller manages and processes, either as injured party or tortfeasor, personal data relating to third parties for the purpose of arranging/administering damage claims.	For 5 years pursuant to Section 6:22 (1) of the Civil Code.

damage incident file, and, eventually expert(s') opinion			
Invoices and transaction certificates issued	Legitimate interest as legal basis (Article 6 (1) f) of the Regulation)	It is inevitable that the Data Controller manages and processes, either as injured party or tortfeasor, personal data relating to third parties for the purpose of arranging/administering damage claims.	For 8 years following the year when the accounting document was issued (Article 169 of the Sztv.)

Data transfer: documentations generated in the course of the arrangement/administration of damage claims are necessarily sent to the competent insurance companies and insurance brokers for assessment of the damage claim. If the complexity of the case justifies, an expert or an official body might also be involved.

8.4. Profiling in a system that supports bulk mailing

The purpose of data processing: to record and maintain the contact details (name, email address) necessary for communication with the Data Subject, for providing information by electronic means related to the use of public services, and for sending marketing messages and offers. To collect and monitor data on the delivery result and readership of emails, statistically analyze clicks on links in mailings using a heat map, identify the most cost-effective way to deliver mail, and identify and develop transparent, understandable, and user-friendly information. The heat map (profile) is only processed and analyzed in an aggregated and anonymous way.

Scope of data processed: Name and email address of the Data Subject as recipient, the fact of successful/unsuccessful delivery of the email, the time of delivery, the time of opening the letter, whether the link embedded in the letter was clicked (heat map).

Legal basis for processing: Legitimate interest of the controller or a third party (Article 6(1)(f) of the Regulation).

Time of data processing: Based on the validity of the consent to the processing of the e-mail addresses of the Data Subjects, with the data automatically deleted upon the expiry of consent (e.g. revocation). The general retention period for correspondence stored in the electronic information system which is not part of the master data is 5 years.

Data processed	Legal basis	Purpose of data processing	Retention period
Name and email address of the Data Subject as recipient, the fact of successful/unsuccessful delivery of the email, the time of delivery, the time of opening the letter, whether the link	Legitimate interest as a legal basis (Article 6(1)(f) of the Regulation)	Communication to the Data Subject, electronic information related to the use of public services, and the registration and maintenance of contact details (name, email	Until the withdrawal of the Data Subject's consent to the processing of his/her email address / the general retention

embedded in the letter was clicked (heat map).		address) for sending marketing messages and offers. To collect and monitor data on the delivery result and readership of emails, statistically analyze clicks on links in mailings using a heat map, identify the most cost-effective way to deliver mail, and identify and develop transparent, understandable, and user-friendly information.	period for mail qualifying as non-personal data stored in the mail system is 5 years.
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8.5. Property and asset protection

8.5.1. Camera system

The Data Controller is considered a body fulfilling tasks in the public interest and it operates, in compliance with its statutory obligations, an electronic surveillance and recording system (hereinafter: camera system) in its premises, central office building and customer service offices. The Data Controller meets its obligation to inform those concerned by warning pictograms indicating the locations of the cameras and by issuing a summary information leaflet. A separate Privacy Policy Information has been drawn up concerning the camera system, which is accessible from the following site:

<https://www.vizmuvek.hu/hu/adatkezeles>.

8.5.2. Access control system

Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
Name, residential address and personal identity document number of the Data Subjects	Performance of a task carried out in the public interest as legal basis (Article 6 (1) e) of the Regulation)	The Data Controller manages and processes the Data Subjects' data for the purpose of protecting property, assets and key infrastructure.	For 24 hours in case of visitors/while in case of partners, for 6 months following the termination of the contractual partnership relationship.
Data Subject's phone number, in case of partner cards	Consent as legal basis (Article 6 (1) a) of the Regulation)	The Data Controller manages and processes the Data Subject's phone number for the purpose of contact keeping.	Until withdrawal of the Data Subject's consent/for 6 months.

8.5.3. Permission for entry to a protected area

Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
Data generated in the course of applying for a permission for entry to a protected area	Statutory obligation as legal basis (Article 6 (1) c) of the Regulation) (Article 9/B. of Fbőtv.)	Ensuring the opportunity for staying in certain parts of protected areas for the Data Subject, compliance with a statutory obligation.	For 18 months from receipt of the form.

9. Transmission of data and activities performed by data processors

9.1. Data transmission

Data may be disclosed to Recipients only on the basis of the Data Subject's consent, performance of a contract, authorisation granted by a statute or legitimate interest of the Data Controller or a third party concerned by the data transfer.

The Data Controller will inform the Data Subject (if it is possible, necessary and reasonable) already at the time of conclusion of the contract, capturing the data or prior to the data transmission about the fact, legal basis and purpose of the data transmission, about the eventually applicable limitations and the Data Subject's rights.

The following Table summarizes the recipients of regular data transmissions by the Data Controller, along with the legal bases for data transmission relevant to them and the scope of the Data Subjects affected:

[Regular data transmissions performed by the Budapest Waterworks](#)

9.2. Data processing

The Data Controller reserves the right to use the services of data processors in fulfilling its activities, on a permanent or ad hoc basis. The Data Controller is obliged at the same time, in outsourcing certain public service activities carried out by it (use of the services of a data processor) to inform or obtain a preliminary authorisation from the Hungarian Energy and Public Utility Regulatory Authority for the outsourcing, in accordance with Article 45 of the Vksztv. A commission for performing permanent data processing may primarily be given for fulfilling administrative tasks related to customer relations and provision of services, as well as for maintenance of the IT system.

The scope of data processors the services of which the Data Controller uses is continuously changing.

The Data Processor uses the services of the following undertakings and persons as data processors under a long-term data processing commission:

[List of data processors involved in the data processing activity of Budapest Waterworks](#)

10. Rights and legal remedies

	Rights	Explanations
1.	Information and access to personal data	The Data Subject has the right to get to know his/her personal data stored by the Data Controller, to get and verify the information related to their processing, and is entitled to get access to the personal data (e.g. information about the purpose and legal basis of the processing, when will the data be erased, request a copy of the contract and get the voice recording).
2.	Right to rectification and to supplement the personal data	The Data Subject has the right to contact the Data Controller in order to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. (e.g. in case of a change in her/her name, for providing a new phone number).
3.	Right to restriction of processing	The Data Subject has the right to obtain from the Data Controller restriction of processing where one of the following applies: • the accuracy of the personal data is contested by the Data Subject, for a period enabling the Data Controller to verify the accuracy of the personal data, • the data processing is unlawful and the Data Subject opposes the erasure of the data, s/he'd rather request the restriction of their use, • the Data 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, • the Data Subject objects to the processing: in such a case the restriction will concern the period pending the verification whether the legitimate grounds of the Data Controller override those of the Data Subject.
4.	Right to erasure ("right to be forgotten")	The Data Subject has the right to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay where one of the following grounds applies: • the personal data are no longer necessary in relation to the purposes for which the Data Controller collected or otherwise processed them, • the Data Subject withdraws his/her consent on which the processing is based, and where there is no other legal ground for the processing, • the Data Subject objects to the processing on grounds relating to his or her particular situation, and there are no legitimate grounds for the processing, • the Data Subject objects to processing of personal data concerning him or her for direct marketing purposes, including profiling, if it is related to direct marketing,

		- the personal data are unlawfully processed by the Data Controller; - the personal data have been collected in relation to the offer of information society services intended directly for children. The Data Subject may not exercise his/her right to erasure/right to be forgotten to the extent that processing is necessary: - for exercising the right of freedom of expression and information; - for reasons of public interest in the area of public health; - 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; or <i>for the establishment, exercise or defence of legal claims.</i>
5.	Right to data portability	The Data Subject has the right to receive the personal data concerning him or her, which he or she has provided to and stored in the Data Controller's system and use them further on for his/her own purposes, where the processing is based on consent or a contract, and the processing is carried out by automated means. This entitlement is limited, in each case, to the scope of data provided by the Data Subject, there is no opportunity for data portability concerning other data (e.g. statistics).
6.	Right to object to the processing of personal data	The Data Subject has right to object at any time to processing of personal data concerning him or her which is based on the legal basis that processing is necessary for the purposes of the legitimate interests pursued by the Data Controller (e.g.: profiling, direct marketing), or the legal basis that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. In such a case our Company may no longer process the personal data unless our 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.

The Data Controller will inform the Data Subject of the measures it has taken without undue delay, **within 30 days** from the date of receipt of any request. If the Data Subject has submitted the request in an electronic way, the Data Controller will provide the information also electronically, unless otherwise requested by the Data Subject.

The Data Subject can resort directly to the Data Controller's **data protection officer** with general questions concerning data protection: Károly Gróf; phone number: +36 (1) 465 2400;

e-mail: adatvedelem@vizmuvek.hu; mailing address: Budapest Waterworks Co. Ltd. 1397 Budapest, Pf. 512.

In matters affecting the lawfulness of the processing of the personal data of the Data Subject by the Data Controller, they may request action by the **Hungarian National Authority for Data Protection and Freedom of Information** (for short: NAIH; registered office: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9., website: www.naih.hu, phone number: +36 (1) 391 1400, fax: +36 (1) 391 1410, central e-mail address: ugyfelszolgalat@naih.hu), or may apply to the regional court of their place of residence („**right to an effective judicial remedy**”).

11. Data Security

The Data Controller takes all necessary measures to guarantee the security of the data, to ensure an adequate level of data protection, prevent unauthorised access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction or corruption.

The Data Controller selects such IT tools for the management, processing and record keeping on personal data that guarantee that the processed data are accessible only to employees authorised to do so, thereby data integrity is ensured.

The Data Controller ensures the security of the data with appropriate organisational measures, too.

In the event of a data security incident, except for the case such incident does not pose a risk to the rights and freedoms of natural persons, the Data Controller shall, without undue delay, but not later than within 72 hours, inform the Data Subject and the supervisory authority of the data protection incident. In order to control the measures related to the data security incident, to inform the supervisory authority and the Data Subject, the Data Controller keeps records stating the scope of the personal data affected by the incident, the scope and number of the affected data subjects, the date, circumstances, effects and measures taken to remedy the incident.

12. Miscellaneous provisions

The Data Controller reserves the right to amend this Privacy Policy Information unilaterally, with prior notice to the Data Subjects via the Websites.

This Privacy Policy Information is valid as of 01.05.2022.

Budapest Waterworks