

General Privacy Policy Information

Short extract

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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>) 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.](#)

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

2. Scope of application of the Information

Material scope of application	Data and processing related to the scope of application
- data controlling related to public service contracts, performed as a public service provider	It contains the data of natural persons, who are in customer relation with the Company, wish to be in customer relation with the Company, are related to persons in customer relationship with the Company in a way that controlling their personal data is necessary for the performance of the Company's services.
- data controlling related to non-public service contracts, not performed as a public service provider	It contains the data of natural persons, who are in relation with the Company, wish to be in relation with the Company, are related to persons in relationship with the Company in a way that controlling their personal data is necessary for the performance of the Company's services. the following are included: laboratory service, waterproof protection, looking for pipe breakage, hydrant water flow measurement, real estate rental, data controlling related to certain financial transactions (e.g. issuing invoices)

- Data controlling by websites operated by the Company (https://www.vizmuvek.hu ; https://ugyfelszolgalat.vizmuvek.hu)	the following are included: data controlling by online customer service, data controlling for surveys and questionnaires related to the Company, contacting via online forms
- other, special data controlling	the following are included: data controlling for marketing purposes, data controlling for market and public opinion research, data controlling related to extraordinary events and damage incidents, data controlling related to profiling implemented in systems supporting mass mail sending, data controlling related to asset protection
- data controlling related to contractual relationships other than the above categories	-

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.
- For internal data controlling related to the controlling of personal data of the employees of the Company.

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.

Purposes belonging to each data controlling - broken down by data type - are contained in sections 5.-8. of this Information.

Data controlling purposes of each data controlling are as follows:

Data controlling	Data controlling purposes
- data controlling related to public service contracts, performed as a public service provider	- determination of eligibility for the service - identification of the applicant prior to contracting - contracting - fulfillment of the contract - issuing bills - receivables management, claim enforcement

	<ul style="list-style-type: none"> - compliance with consumer protection regulations, complaint handling - quality assurance, increasing the efficiency of quality control, abuse prevention - assessment of procedural rights (examination of power of attorney) - determination of user status to be protected and the discounts available in this regard - termination of contract
<ul style="list-style-type: none"> - data controlling related to non-public service contracts, not performed as a public service provider 	<ul style="list-style-type: none"> - identification of the client prior to contracting - contracting - fulfillment of the contract (including maintaining contact) - assessment of procedural rights (examination of power of attorney) - receivables management, claim enforcement - compliance with consumer protection regulations, complaint handling - quality assurance
<ul style="list-style-type: none"> - Data controlling by websites operated by the Company (https://www.vizmuvek.hu; https://ugyfelszolgalat.vizmuvek.hu/; 	<ul style="list-style-type: none"> - online customer service: identification, service provision, information about changes - surveys, questionnaires: satisfaction measurement, service development - contact via online form: contact, identification
<ul style="list-style-type: none"> - other, special data controlling 	<ul style="list-style-type: none"> - data controlling for marketing purposes; business acquisition - data management for market and public opinion polls: research sample compilation, service development - extraordinary events - data management due to damage events: claims management - profiling implemented in a system supporting mass mailing: statistical analysis, increasing cost efficiency, supporting user-friendly communication - data controlling for asset protection: asset protection
<ul style="list-style-type: none"> - data controlling related to contractual relationships other than the above categories 	<ul style="list-style-type: none"> - the purpose of data controlling is determined by the specific legal relationship, the purpose is contained in the contractual provisions or the inseparable annexes of the given contract for each legal relationship

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:

Serial	Data Subject	Scope of the controlled data	Legal basis	Purpose of data controlling:	Retention time
5.1.	Natural person being in public service contractual relationship with the Data Controller (client)	Customer's natural identification data (first and last name, birth first and last name, address, mother's name, place and date of birth)	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation - pursuant to Vhr 56.) (1))	The Data Controller controls the Customer's data for the purpose of proper identification. Customer identification is required for concluding a contract, fulfilling a contract, managing accounts receivable, and validating claims related to the contract.	For 8 years from the year of issuance of the last accounting document related to the contract (Act C of 2000 on Accounting (hereinafter: Sztv.) 169.§)
5.2.	Owner of the consumption site	Data of the owner of the consumption site	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	Mainly the data of the owner of the consumption site can be controlled, pursuant to Section 2.6 of the Vksztv. If the conclusion of the contract and the	8 years following termination of the contractual relationship.

				provision of services are not possible without providing the data of the actual owner, the personal data of the owner will be controlled by the Data Controller.	
5.3.	Owner of the consumption site	Data of the owner of the consumption site	Legitimate interest as legal basis (Article 6, Paragraph (1), Clause f) of the Regulation)	The Data Controller controls the data of the owner of the consumption site based on the underlying liability pursuant to Section 2 (6) of the Vksztv., for the purpose of enforcing receivables.,	With respect to Section 5.2., for 8 years following the termination of the contractual relationship/ based on the Data Subject's objection, until the decision made by the Data Controller.
5.4.	Natural person entering into contact with the Data Controller for the purpose of using its service	Applicant's natural identification data (first and last name, birth first and last name, address, mother's name, place and date of birth)	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation - pursuant to Vhr 56.) (1)	The Data Controller controls the Applicant's data for the purpose of proper identification of the Applicant. Identification of the Applicant is necessary for the determination of the eligibility for the service.	3 year from the receipt of the form.
5.5.	Natural persons belonging to the Data Controller's service area	Technical data related to the property of the Data Subjects	Legitimate interest as legal basis (Article 6, Paragraph (1), Clause f) of the Regulation)	On properties located in our service area, technical data related to water and wastewater services are recorded for registration purposes. (E.g.: connection plan, internal water network plan, title deed and data on planned water demand) Data registration is necessary for the fulfillment of the contract.	Until the validity period of the Operator's license of the Data Controller / until the decision made by the Data Controller based on the Data Subject's objection.
5.6.	Natural person being in public service contractual	Data related to the Data Subject's consumption	Legal basis for contracting (Article 6, Paragraph (1),	Controlling these data is closely related to the fulfillment of the contract. The Data	8 years following termination of the contractual relationship.

	relationship with the Data Controller (client)	provision and use of the service	Clause b) of the Regulation)	Controller manages the data generated during the performance of the contract, with particular regard to invoice data, requests from customers, claims, documents and records taken during the service.	
5.7.	Natural person being in public service contractual relationship or entering into contact with the Data Controller for the purpose of using its service	Complaints related to provision and use of the service by the Data Subject	Legal obligation as legal basis (Article 6, Paragraph (1), Clause c) of the Regulation Fogytv. 17/B.§ (5))	Controlling of these data is closely related to consumer protection regulations and the fulfillment of the contract, so the Data Controller handles the complaints that arise in order to comply with legal obligations.	Act V. of 2013 on the Civil Code (hereinafter referred to as Civil Code.) For 5 years pursuant to Article 6:22 (1) of the Civil Code
5.8.	Natural person being in public service contractual relationship with the Data Controller (client)	Data related to fees and costs payable and paid by the Data Subject, data of receivables	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	The Data Controller controls all data related to the Data Subject's payment obligation, from which it can be determined whether the Data Subject has fulfilled the payment obligation or not. Controlling of the data is necessary for the fulfillment of the contract, the management of outstanding debts and the enforcement of claims arising from the contractual relationship.	For 5 years pursuant to Article 6:22 (1) of the Civil Code
5.9.	Natural person being in or wishing to establish a public service contractual relationship with the Data Controller (client)	Data necessary to certify the change of consumer	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	The Data Controller controls the copy of the document necessary for the change and to prove that the change has taken place (e.g. purchase contract, gift agreement, rental contract). The Data Subject has the	8 years following termination of the contractual relationship.

				right to delete (cover out) the data from the copy that are not necessary to verify the change of consumer. Controlling of the data is necessary for the fulfillment of the contract.	
5.10.	Natural person being in public service contractual relationship with the Data Controller (client)	Copy and data of documents supporting legal relationship	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	The Data Controller makes copies of individual documents certifying the legal relationship (e.g.: birth certificates, title deeds, transfer of ownership minutes, owner's consent, Municipal resolution) in order to establish the correctness of the data and the legal relationship. So, the purpose of data controlling is contracting and to fulfill the contract, as well as potential claims enforcement related to the contract. Certificate-type personal documents are exceptions, of which the Data Controller does not make copies.	8 years following termination of the contractual relationship.
5.11.	Natural person being in public service contractual relationship with the Data Controller (client), in case of data concerning the consumption site, the owner of the property	Identification data of consumption site and meters	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	The Data Controller controls technical data related to the consumption site and meters, including factory number, meter location number, VIPAK number, expiry date, and connects them to the Data Subject. The purpose of data controlling is the fulfillment of the contract.	After 8 years following the termination of the public utility contract, the connection between the Data Subject and the identification data expires. Technical data of the place of consumption and measuring devices are not deleted by themselves, they are kept until the

					validity period of the Operator's license of the Data Controller.
5.12.	Natural person being in public service contractual relationship with the Data Controller (client), in case of data concerning the consumption site, the owner of the property	GPS coordinates of the consumption site and meters	Legitimate interest as legal basis (Article 6, Paragraph (1), Clause f) of the Regulation)	Based on the legitimate interest of the Data Controller, during meter reading and technical investigations, the data Controller takes photographs of the meters and technical facilities, during which it also records the data of the GPS coordinates of the meter. The purpose of data controlling is the fulfillment of the contract.	After 8 years following the termination of the public utility contract, the connection between the Data Subject and points of consumption data expires. GPS coordinates of the point of consumption and meters are not deleted by themselves, they are kept until the validity period of the Operator's license of the Data Controller.
5.13.	Authorized person or natural person fulfilling representation	Data of natural persons concerned by authorization and representation	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	Primarily, the data of the person authorized to administer the public service may be processed. The name, place and date of birth, mother's name, address, and signature are provided by the Data Subject as a minimum content element. The purpose of data controlling is to assess procedural rights.	For the validity period of the authorization and representation/5 years pursuant to Article 6:16 of the Civil Code.
5.14.	Natural persons conducting a telephone conversation with the phone customer service	Telephone conversation with the phone customer service	Legal obligation as legal basis (Article 6, Paragraph (1), Clause c) of the Regulation Fogytv. Article 17/B.)	The Data Controller records and handles the audio recording of the conversation between the Data Subject and the customer service as defined in the applicable laws, primarily in the Act on Consumer	5 years from the date of making the recording (Fogytv. 17/B.§ (3)).

				Protection. The purpose of data controlling may be - depending on the content of the conversation - contract fulfillment or complaint handling.	
5.15.	Natural persons contacting the customer service	Data generated during contacting the customer service	Legal obligation as legal basis (Article 6, Paragraph (1), Clause c) of the Regulation) (Vhr.89/C.§ (1))	Data generated at the customer service during the contact between the customer service and the Data Subject are controlled for administrative purposes and for the fulfillment of the contract.	For 5 years pursuant to Article 6:22 (1) of the Civil Code
5.16.	Users to be protected, being in public service contractual relationship with the Data Controller	Documents verifying user status to be protected	Legal obligation as legal basis (Article 6, Paragraph (1), Clause c) and Article 9, Paragraph (2) b) of the Regulation) (Vksztv. Article 61/A.)	The Data Controller keeps records in order to ensure the benefits of the users to be protected, from which it can be clearly determined which range of benefits the data subject is entitled to. Inclusion in the records must be initiated by the Data Subject, and the documents specified in Government Decree (58/2013.(II.27.)) to prove belonging to the user group to be protected must be attached to the application.	After the expiry of the eligibility, the registered data are deleted (pursuant to Article 61/A (7) of Act CCIX of 2011 on water public services

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:

Serial	Data Subject	Scope of the controlled data	Legal basis	Purpose of data controlling:	Retention time
6.1.	Natural person contacting the Data Controller for the purpose of using its service (applicant)	Data of the Applicant (name, address, mother's name, place and date of birth)	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	The Data Controller controls the data for the purpose of identifying the Ordering Party and preparing a proposal. So, the purpose of data controlling is to identify the other party prior to contracting.	If contracting fails, six months from the date of ordering.
6.2.	The natural person establishing the contractual legal relationship with the Data Controller (Customer)	Data of the Ordering Party (name, address, mother's name, place and date of birth)	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	The Data Controller controls the data for the purpose of identifying the Ordering Party and preparing invoices. Identification of the Client is required for concluding a contract, fulfilling a contract and validating claims related to the contract.	For 8 years following the issuance of the last accounting document related to the contract (Sztv.169.§).
6.3.	Natural person contacting the Data Controller for using the service (Customer)	Telephone number and email address required to maintain contact with the Data Subject	Consent as legal basis (Article 6, Paragraph (1), Clause a) of the Regulation)	If the Data Subject or the representative of the community - thus in particular the common representative of the apartment buildings - consents, the Data Controller shall control the telephone number and e-mail address necessary for contact. The purpose of data controlling is the fulfillment of the contract.	Until the consent is withdrawn/ 6 month following the duration of the concluded contract.
6.4.	Authorized person or natural person fulfilling representation	Data of natural persons concerned by authorization and representation	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	Data of the authorized person is primarily controlled for the purpose of administering the requested services. The purpose of data controlling is to assess procedural rights.	For the validity period of the authorization and representation/5 years pursuant to Article 6:16 of the Civil Code
6.5.	Natural person being in contractual legal relationship with the Data Controller	Data related to the provision and use of the service	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	Controlling these data is closely related to the fulfillment of the contract. The Data Controller controls the data generated during the fulfillment of the contract, in particular the application form,	8 years following termination of the contractual relationship.

				order form, worksheet and certificate of completion.	
6.6.	Natural person being in contractual legal relationship with the Data Controller	Complaints related to provision and use of the service by the Data Subject	Legal obligation as legal basis (Article 6, Paragraph (1), Clause c) of the Regulation Fogytv. 17/B.§ (6))	Controlling of these data is closely related to consumer protection regulations and the fulfillment of the contract, so the Data Controller handles the complaints that arise in order to comply with legal obligations.	For 5 years pursuant to Article 6:22 (1) of the Civil Code
6.7.	Natural person being in contractual legal relationship with the Data Controller	Data related to fees and costs payable and paid by the Data Subject, data of receivables	Legal basis for contracting (Article 6, Paragraph (1), Clause b) of the Regulation)	The Data Controller controls all data related to the Data Subject's payment obligation, from which it can be determined whether the Data Subject has fulfilled the payment obligation or not. the data is necessary for the fulfillment of the contract and the enforcement of claims arising from the contractual relationship.	For 5 years pursuant to Article 6:22 (1) of the Civil Code
6.8.	Natural persons contacting the customer service	Data generated during contacting the customer service	Legal obligation as legal basis (Article 6, Paragraph (1), Clause c) of the Regulation) (Vhr.89/C.§ (1))	Data generated at the customer service during the contact between the customer service and the Data Subject are controlled for administrative purposes and for the fulfillment of the contract.	For 5 years pursuant to Article 6:22 (1) of the Civil Code
6.9.	Natural persons contacting the phone customer service	Telephone conversation with the phone customer service	Legal obligation as legal basis (Article 6, Paragraph (1), Clause c) of the Regulation) (Fogytv. 17/B.§)	The Data Controller records and handles the audio recording of the conversation between the Data Subject and the customer service as defined in the applicable laws, primarily in the Act on Consumer Protection. The purpose of data controlling may be - depending on the content of the conversation - contract fulfillment or complaint handling.	5 years from the date of making the recording (Fogytv, 17/B.§ (3)).

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

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

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: By registering with Client Gateway+ or the Digital Citizenship Framework Application (DÁP), by registering with a non-Client Gateway+/DÁP registration, by completing a pre-registration, by registering with an administration.

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

- ensuring the possibility of logging in to the online customer service, identifying the Data Subject, providing services provided on an online interface;
- 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.

Data Subject	Scope of the data managed	Legal basis	Purpose of the data processing	Retention period
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A natural person logging in the online customer service	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.
A natural person who has an e-mail address and the consent associated with the service relationship or who initiates an online customer service transaction	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.
Natural person registering with Client Gateway+ or DÁP	In the case of registration with Client Gateway+, the name of the Data Subject's mother, date and place of birth of the Data Subject, in the case of registration with DÁP, DÁP ID	Consent as legal basis (Article 6 (1) a) of the Regulation)	Appropriate identification of the Data Subject by Idomsoft Zrt. 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.

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.

Data Subject	Scope of the data managed	Legal basis	Purpose of the data processing	Retention period
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A natural person reporting a meter reading	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.
A natural person making a notification via the online customer service	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 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.	For 5 years pursuant to Section 6:22 (1) of the Civil Code.
Natural person reporting a meter reading	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.
Natural person making an appointment at the customer service office	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

Data Subject	Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
A natural person taking part in surveys and questionnaires	The Data Subject's e-mail address, phone number and mailing address	Consent as legal basis (Article 6 (1) a) of the Regulation)	Assessing the satisfaction of Customers (Data Subjects) and, based on the results, coordinating and developing the Data Controller's services with their needs.	Until withdrawal of the Data Subject's consent.

7.3. 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, enroll 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.

Data Subject	Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
A natural person entering into contact with the Data Controller via the Website	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 provides the data specified in the online contact form to the Data Controller. The purpose of data controlling is establishing contact and identification.	Until withdrawal of the Data Subject's consent/6 months.

8. Other special data processing activities

8.1. Data processing for marketing purposes

Data Subject	Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
Natural persons, based on whose consent the Data Controller intends to transmit information	The Data Subject's e-mail address, phone number and mailing address	Consent as legal basis (Article 6 (1) a) of the Regulation)	Delivery of information materials, promotions and offers on the Data Controller's services to the Data Subject. The purpose of data	Until withdrawal of the Data Subject's consent.

materials, offers and promotions for marketing and business acquisition purposes			controlling is business acquisition.	
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8.2. Data processing for market research and opinion poll purposes

Data Subject	Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
A natural person granting his/her consent to data processing for market research and opinion poll purposes	The Data Subject's e-mail address, phone number and mailing address	Consent as legal basis (Article 6 (1) a) of the Regulation)	In the case of the Data Subject's consent for public opinion and market research, the Data Controller uses the data provided by the Data Subject (name, e-mail address, telephone number, mailing address) for the purpose of compiling an anonymous research sample and service development.	Until withdrawal of the Data Subject's consent.

8.3. Extraordinary events – Damage incidents

Data Subject	Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
Natural persons taking part in the arrangement of damage claims	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, damage incident file, and, eventually expert(s') opinion	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.

Natural persons taking part in the arrangement of damage claims	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.)
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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

Data Subject	Data processed	Legal basis	Purpose of data processing	Retention period
A natural person who receives information and marketing messages in an electronic way and whose data are registered and managed by the Data Controller for these purposes	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).	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 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.	Until the withdrawal of the Data Subject's consent to the processing of his/her email address / the general retention period for mail qualifying as non-personal data stored in the mail system is 5 years.

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.](#)

8.5.2. Access control system

Data Subject	Scope of the data processed	Legal basis	Purpose of the data processing	Retention period
A natural person who enters or stays in the territory of a facility protected by the Data Controller (headquarters, central office building, customer service office)	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.
A natural person who enters or stays in the territory of a facility protected by the Data Controller (headquarters, central office building, customer service office)	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/ 6 months following the return or revocation of the partner card.

8.6. Using SimplePay application to make a payment by credit card via the online customer service

Data Subject	Data category	Purpose of data processing	Legal basis for data processing	Duration of data processing
<p>Customers paying via the Online Payment Service and customers paying via the SoftPOS and POS Terminal Service</p>	<ul style="list-style-type: none"> Name (not managed for SoftPOS, POS, managed for MO/TO transactions) Telephone number (not managed for SoftPOS, POS, except for POS mobile top-up) e-mail address (not managed for SoftPOS, POS) transaction amount IP address (not managed for SoftPOS, POS) transaction date and time, transaction ID delivery address (not managed for SoftPOS, POS, managed for MO/TO transactions) billing address (not managed for SoftPOS, POS, managed for MO/TO transactions) Data of the bank card saved during the payment (token card storage): number, expiry date, CVV code, name on the card Type, number and validity of the bank card used for payment in MO/TO transactions In the case of a Bank Transfer Support and Payment Request: the bank account number and name of the Customer (bank account holder), in the case of a Payment Request the Customer's e-mail address and the payment deadline In SimplePay Application: name of the product purchased by the Customer 	<p>Arrangement, tracking and recording payment transactions and sending messages, notifications and confirmations related to payment transactions</p>	<p>Article 6(1)(b) of GDPR: establishment and performance of a contract</p>	<p>If the data are necessary to fulfil the tax obligation, they are stored and retained for 5 years from the last day of the calendar year in which the tax should have been declared, reported or notified, or in the absence of a declaration, report or notification, the tax should have been paid.</p> <p>If the data are necessary for the fulfilment of accounting obligations, they are kept and stored for 8 years.</p> <p>For 5 years from the date of the payment transaction (general civil limitation period)</p>
<p>Customers paying via the</p>	<ul style="list-style-type: none"> Name (not managed for SoftPOS, POS, managed for MO/TO transactions) 	<p>Payment transaction authorisation</p>	<p>Article 6(1)(b) GDPR:</p>	<p>If the data are</p>

<p>Online Payment Service or via SoftPOS, POS Terminal Service</p>	<ul style="list-style-type: none"> • Phone number (not managed for SoftPOS, POS, except for SimplePOS mobile top-up) • e-mail address (not managed for SoftPOS, POS) • transaction amount • IP address (not managed for SoftPOS, POS) • transaction date and time, transaction ID • delivery address (not managed for SoftPOS, POS, managed for MO/TO transactions) • billing address (not managed for SoftPOS, POS, managed for MO/TO transactions) • Credit card data (token card storage) saved during payment at the trader via SimplePay: number, expiry date, CVV code, name on the card • Type, number and validity of the bank card used for payment in MO/TO transactions 		<p>establishment and performance of a contract</p>	<p>necessary to fulfil the tax obligation, they are stored and retained for 5 years from the last day of the calendar year in which the tax should have been declared, reported or notified, or in the absence of a declaration, report or notification, the tax should have been paid.</p> <p>If the data are necessary for the fulfilment of accounting obligations, they are kept and stored for 8 years. For 5 years from the date of the payment transaction (general civil limitation period)</p>
<p>Customer paying with Online payment service or paying via SoftPOS Service</p>	<ul style="list-style-type: none"> • Name (not managed for SoftPOS, POS, managed for MO/TO transactions) • Telephone number (not managed for SoftPOS, POS, except for POS mobile top-up) • e-mail address (not managed for SoftPOS, POS) • amount of the transaction (including the name of the products, price, discounts granted and delivery charges) • IP address (not managed for SoftPOS, POS) • transaction date and time, transaction ID 	<p>Monitoring and preventing payment fraud, handling chargeback claims and customer complaints</p>	<p>Article 6(1)(f) GDPR: legitimate interest</p>	<p>For 5 years from the date of the payment transaction (general civil limitation period)</p>

	<ul style="list-style-type: none"> • Delivery address/domicile address (not managed for SoftPOS, POS, managed for MO/TO transactions) • billing address (not managed for SoftPOS, POS, managed for MO/TO transactions) • comments of the buyer made on the order • Is the customer a regular, returning customer • Data on the document certifying the receipt by the buyer of the goods ordered by the buyer • Type, number and validity of the bank card used for payment in MO/TO transactions • Data indicated in the certificate of use of the service by the customer • In the case of an immediate transfer: a document certifying that any amount refunded by the trader has been refunded to the customer, stating the amount of the transaction refunded to the customer, the date of the refund and the name and account number of the beneficiary. • For immediate transfers: a bank statement or a receipt clearly showing the amount of the purchase transaction. 			
Person paying online by credit card	<ul style="list-style-type: none"> • name • phone number • e-mail address • IP address • delivery address • billing address <p>Data collected from the browser used by the customer when shopping online:</p> <ul style="list-style-type: none"> • The value of the Accept http header, which is the format that will appear in the body of the http request 	strong customer authentication with 3D Secure for online credit card payments	Article 6(1)(f) GDPR: legitimate interest	For 5 years from the date of the payment transaction (general civil law limitation period)

	<ul style="list-style-type: none">• name and version of the browser and operating system used, default language• IP address of the browser source• whether the browser can run java code• the browser language;• the browser colour depth;• the height of the browser screen;• the width of the browser screen;• the browser time zone. <p>How the customer makes a purchase from the Merchant:</p> <ul style="list-style-type: none">• As a guest, without registration• As a registered customer• As a customer registered with a third-party ID (Google, Facebook, registered with other accounts)			
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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

Serial	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	<p>The Data Subject has the right to obtain from the Data Controller restriction of processing where one of the following applies:</p> <ul style="list-style-type: none"> • 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 deletion (“right to be forgotten”)	<p>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:</p> <ul style="list-style-type: none"> • 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.

		<p>The Data Subject may not exercise his/her right to erasure/right to be forgotten to the extent that processing is necessary:</p> <ul style="list-style-type: none"> • 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	<p>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).</p>
6.	Right to object to the processing of personal data	<p>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.</p>

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 15.07.2025.

Budapest Waterworks