

## PRIVACY POLICY INFORMATION on the use of cookies

### 1. Introduction

Fővárosi Vízművek Zártkörűen Működő Részvénytársaság (Waterworks of Budapest Private Company Limited by Shares) (registered office: 1138 Budapest, Váci út 182., trade register number: 01-10-042451; **hereinafter: Data Controller**) pays special attention to ensuring that its activities comply with the applicable legal requirements, especially with regard to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (**hereafter: Regulation**), as well as to the expectations and practices of the water utility provider sector.

The Data Controller intends to ensure the transparency of its data processing activities with this Privacy Policy information (**hereinafter: Information**) and the provisions of the related internal regulations, and also wishes to inform the visitors of the Data Controller's websites <https://www.vizmuvek.hu/>; <https://ugyfelszolgalat.vizmuvek.hu/>; <https://www.vizalvedelem.hu> and <https://www.vizpluszkartya.hu> (**hereafter: websites**) (**hereafter: Data Subjects**) about their right to information self-determination in relation to the processing of cookies.

Should the Data Subjects have general questions concerning data security, they can also contact directly the data protection officer of the Data Controller: Gróf Károly; telephone number: 06 1 465 2400; e-mail: [adatvedelem@vizmuvek.hu](mailto:adatvedelem@vizmuvek.hu); Postal mail: Fővárosi Vízművek Zrt. 1397 Budapest, POB 512.

### 2. Scope of the Information

The scope of this Information covers data processing related to cookies used on the Data Controller's websites.

### 3. Purpose of the data processing

In order to ensure the proper functioning of the websites, the Company uses cookies that ensure basic operation. **Cookies that provide basic functionality allow websites to function properly, make it easier to use, and store information without identifying our visitors.** As a result of the above, cookies that provide a minimum of basic functionality will be placed and read back on the computer of website visitors, additional cookies may only be used for personalized service with the express consent of the Data Subjects.

**Further data processing purposes can be:**

- **anonymous collection of statistical information and the use of their results for the development of the websites** (functional cookies) in the course of monitoring the activities related to the use of the websites by the Data Subjects,
- identification, differentiation of the Data Subjects from one another, collection of data on behavior and interests, and prevention of data loss, allowing **personalized offers** and advertisements **to be displayed to website visitors** on the Facebook and Google Display Network sites (convenience cookies).

#### 4. Legal basis of the data processing, scope of the data processed

**Scope of the data processed:** in the case of cookies providing basic operation, the identification number, date and time of the IP address of the Data Subject; for functional cookies, user interactions on websites, anonymized and aggregated data; in the case of convenience cookies, the collection of behavioral and interest data, as well as analytical data on the user's use of the website.

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

A table summarizing the cookies used is available in Annex 1 of the Privacy Policy information and/or under the link <https://vizmuvek.hu/en/data-protection/cookies>, which contains the cookies used for their data processing purposes and legal basis, with their description and retention period.

#### 5. Data security and data processing

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

The Data Controller selects such IT tools for the processing of personal data that guarantee that the processed data is accessible only to those authorized to do so (availability), the authenticity of the data is ensured (authenticity of data processing), its invariability can be verified (data integrity) and/or is protected against unauthorized access (confidentiality of data).

The Data Controller ensures the security of the data with appropriate organizational 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.

The Data Controller reserves the right to use a data processor in the course of its activities, on a permanent or ad hoc basis. The use of a data processor may only take place on the basis of a written contract. The rights and obligations of the data processor related to the processing of personal data are determined by the Data Controller within the framework of the relevant legal regulations. The Data Controller is responsible for the legality of the instructions concerning the data processing operations.

The Data Controller shall ensure that the rights of the data subjects are not violated during the activities of the data processor by establishing contractual conditions providing guarantees and appropriate organizational and technical measures, and that the data processor may only become acquainted with personal data to the extent absolutely necessary for the performance of its tasks.

The rights and obligations of the data processor related to the processing of personal data are determined by the Data Controller within the framework of the relevant legal regulations. The Data

Controller is responsible for the legality of the instructions concerning the data processing operations. The Data Controller ensures that the rights of the data subjects are not violated during the activities of the data processor by establishing contractual conditions providing guarantees and appropriate organizational and technical measures, and that the data processor may only learn the personal data to the extent absolutely necessary for the performance of its tasks.

Currently, the Data Controller uses the following companies as data processors in the operation of the websites:

Name: Wildom Informatikai Szolgáltató és Tanácsadó Kft.  
 Registered office: 1146 Budapest, Hermina út 17, floor 2  
 E-mail address: wildom@wildom.com  
 Website: www.wildom.com  
 Activity: website maintenance tasks

Name: EazyDigital  
 Registered office: 1024 Budapest Széll Kálmán tér 11.  
 E-mail address: 1024 Budapest Széll Kálmán tér 11.  
 Website: [https://eazy.digital/hu\\_HU/](https://eazy.digital/hu_HU/)  
 Activity: provision of a full range of online marketing services

Name: Google Inc. („Google”), Google Ireland Ltd.  
 Registered office: Barrow Street, Dublin 4, Ireland,  
 Website: <https://policies.google.com/privacy?hl=hu>  
 Activity: Provision of Google Adwords remarketing and Google Analytics services

Name: Facebook Ireland Ltd.  
 Registered office: Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland  
 Website: <https://www.facebook.com/policies/>  
 Activity: Provision of Facebook pixel service

Name: Hotjar Ltd.  
 Registered office: Dragonara Business Centre 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141  
 Malta, e-mail: support@hotjar.com  
 Website: <https://www.hotjar.com/legal/policies/privacy/>  
 Activity: Provision of Hotjar service

## 6. Rights and remedies

	Rights	Explanation
1.	Information and access of data	<p>The Data Subject has the right to access the personal data stored by the Data Controller and verify the information related to their processing, and is also entitled to have access to the personal data. The <u>Help function</u> in the menu of most browsers gives information on the following:</p> <ul style="list-style-type: none"> <li>• in your browser, exactly what cookies are stored on the device used for browsing</li> <li>• how to ban cookies,</li> <li>• how to accept new cookies,</li> <li>• how to delete already accepted cookies.</li> </ul>

<p>2.</p>	<p><b>Right to restrict data processing</b></p>	<p>The Data Subject has the right to request the Data Controller to restrict the processing of their data if:</p> <ul style="list-style-type: none"> <li>- the Data Subject disputes the accuracy of the personal data, in which case the restriction applies to the period of time that allows the Data Controller to verify the accuracy of the personal data;</li> <li>- the data processing is illegal and the Data Subject opposes the deletion of the data and instead requests a restriction on their use;</li> <li>- the Data Controller no longer needs personal data for the purpose of data processing, but the Data Subject requests them in order to submit, enforce or protect legal claims...</li> <li>- the Data Subject objects to the data processing: in this case the restriction applies for the period until it is determined whether the legitimate reasons of the Data Controller take precedence over the legitimate reasons of the Data Subject.</li> </ul>
<p>3.</p>	<p><b>Right to deletion (forgetting)</b></p>	<p>The Data Subject has the right to request the Data Controller to delete personal data concerning them without undue delay if any of the specified reasons exist:</p> <ul style="list-style-type: none"> <li>- personal data are no longer required for the purpose for which they were collected or otherwise processed by the Data Controller;</li> <li>- The Data Subject withdraws the consent on which the data processing is based and there is no other legal basis for the data processing,</li> <li>- the Data Subject objects to the data processing for reasons related to their own situation and there is no legitimate reason for the data processing;</li> <li>- the Data Subject objects to the processing of personal data concerning them for the purpose of direct business acquisition, including profiling, insofar as it relates to direct business acquisition;</li> <li>- the Data Controller processes the personal data illegally;</li> <li>- personal data were collected in connection with the provision of information society services directly to children.</li> </ul> <p><b><i>The Data Subject may not exercise its right to deletion, forgetting, if the</i></b> data processing</p> <ul style="list-style-type: none"> <li>- is necessary for archivation, scientific and historic research or statistical purposes, if exercising the right to deletion would prevent or seriously jeopardize such data processing, or</li> <li>- is necessary to submit, enforce or defend legal claims.</li> </ul> <p>The <u>Help function</u> in the menu of most browsers gives information on the following:</p> <ul style="list-style-type: none"> <li>• in your browser, how you can ban cookies</li> <li>• how you can delete already accepted cookies.</li> </ul> <p>In view of the above the Data Subject can also exercise their right to delegation through their own browser.</p>
<p>4.</p>	<p><b>Protest against the processing of personal data</b></p>	<p>The Data Subject has the right to object at any time to the processing of personal data processed in accordance with a legitimate interest.</p>

The Data Controller shall, without undue delay, inform the Data Subject of the measures taken **within 30 days** of receipt of any request. If the Data Subject has submitted the request electronically, the Data Controller shall provide the information electronically, unless otherwise requested by the Data Subject.

If the Data Subject's request is clearly unfounded or excessive (especially in view of its repetitive nature), the Data Controller may charge a reasonable fee for the execution of the request or refuse to take action. The burden of proving this lies with the Data Controller. If the Data Controller has doubts about the identity of the natural person submitting the request, it may request the submission of additional information necessary to confirm the identity of the requester.

In matters affecting the legality of processing the personal data of the Data Subject by the Data Controller they may request action by the **National Data Protection and Freedom of Information Authority** (for short: NAIH; registered office: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, POB 9., website: [www.naih.hu](http://www.naih.hu), telephone: +36 (1) 391-1400, fax: +36 (1) 391-1410, central e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)), or may apply to the **court** of their place of residence ("**right of appeal**").

## 7. Other provisions

The Data Controller reserves the right to unilaterally amend this Privacy Policy Information with prior notice via the affected websites.

This Privacy Policy is valid from 30, July 2021.

**Fővárosi Vízművek Zrt.**