

PRIVACY NOTICE

1. General provisions

1.1. Identity of the Operator

This website is operated by the Fővárosi Vízművek Zártkörűen Működő Részvénytársaság (Company Reg. No.: 01-10-042451, registered seat: H-1138 Budapest, Váci út 182) (hereinafter referred to as the Operator)

With regard to data processing related to the Website, the controller of personal data is the Operator.

1.2. User

User means any private individual that visits the website, and requests and uses the services available on the website.

1.3. Scope of this Notice

This Privacy Notice (hereinafter the Notice) covers the services provided and data processing in connection with the Operator's website (hereinafter the Website), excluding the website related to the Vízplusz (Water plus) card (www.vizpluszkartya.hu). Unless provided otherwise, this Notice shall not cover services and data processing related to the services, other campaigns and content published by third parties advertising on this Website or appearing on it in any other way. Unless provided otherwise, this Notice shall not cover services and data processing of websites and service providers linked on this Website. This Notice shall not cover data processing performed by the Operator as public utility provider, data processing containing customer data, and data processing containing the data of entities in other contractual relationship with the Operator.

Decisions related to data processing are to be made by the Operator. The Operator is a Hungarian legal person, the location of the data processing is Hungary.

2. Data processing principles

The Operator seeks to enforce the following principles of the processing of personal data in its data processing activities:

- Principles of lawfulness, due process and transparency
During data processing the Operator is required to act in line with the requirements of good faith and integrity, in cooperation with the user, and seeks to perform its data processing activities in a manner transparent for the user.

- Principle of purpose limitation
The Operator collects personal data for defined, clear and lawful purposes, and the Operator intends to process user data in a manner consistent with the purposes set out in this Notice. The Operator deletes personal data in any case when the purpose for data processing no longer exists, and no statutory obligation or legitimate interests exists for the continued storage and processing of those data.
- Principle of data economy
Any personal data provided by the User are to be relevant for the achievement of the data processing purpose, and the Operator ensures that it restricts the range of personal data it processes to the necessary minimum. The Operator will not process any data that is not necessary for the achievement of the data processing purposes. In addition, the Operator seeks in any case to minimise data processing, as long as it is permitted by the IT systems and its interest in achieving the data processing purposes.
- Principle of precision
The Operator takes all reasonable measures, upon the User's request, to erase or rectify immediately any personal data that are incorrect for the data processing purposes, and in this way it ensures that data are up-to-date.
- Storage restrictions
In order to ensure that the storage of personal data is restricted to the necessary period, the Operator sets erasure deadlines.
- Integrity and confidentiality
The Operator protects personal data in particular against unauthorised access, change, transfer, disclosure, erasure or destruction, and accidental deletion or destruction, furthermore inaccessibility due to the change of the technology used.
- Accountability – privacy by design and default
The Operator performs appropriate technical and organisational measures both during the determination of the way data are processed and during data processing, taking into account the current state of science and technology and the implementation costs, as well as the nature, scope, circumstance and objective of data processing, and the changing probability and severity of risks posed to User rights and freedoms, with the view to comply with the data protection principles, on the one hand, and the requirements set out in the Regulation, on the other hand, and the integration of guarantees required for the protection of the data subjects rights in the data processing process.

3. Data processing

3.1. Legal basis for data processing

The legal basis of data processing, in the context of the Website's use and the services available on the Website, is the voluntary consent from the user, under Article 6 (1) (a) of the 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 (the Regulation).

The Operator exclusively processes personal data provided by the User, and data provided by the User on the Website's interfaces suitable to enter personal data. The Operator seeks to fully enforce the User's rights. The Operator processes all personal data for the purpose of enabling it to provide and develop the Website's services.

The User is entitled to withdraw the consent granted to data processing, fully or partially, and to request the erasure of his data by way of a written notification/application addressed to the Operator.

3.2. Scope of processed data, purpose and duration of data processing

3.2.1. Registration

The Website may be visited without registration. The Operator reserves the right to provide services via the Website that are subject to registration (for example special offers, prize games, newsletter, online customer service access).

During registration the user enters himself the data specified on the registration form. The purpose of the data specified is to provide a service that is subject to registration and to identify the data subject. The Operator reserves the right to make the registration conditional upon the provision of certain data. Data provided during registration are processed by the Operator.

Purpose of Data processing

The primary purpose of processing data provided during registration is user identification and liaising with the user. In addition, data processing serves the purpose of the provision of the Website services, furthermore sending newsletter and advertisements to users, and market and opinion research, as set out in this Notice.

During the data processing the Operator acts in compliance with the relevant laws, in particular the Regulation. Consent from the data subject is the legal basis for data processing in each case.

The Operator reserves the right to change the content of the registration form, to delete certain fields or create new fields, in particular if it is made necessary or justified by user demand or legislative changes. The Operator informs the users about any such change. The Operator may not change any provided data.

In addition to the above, further data processing may be linked to certain services. The Operator provides appropriate information on the details of this voluntary consent based data processing.

Duration of data processing

The Operator processes any data until the consent is withdrawn or the registration is deleted.

Access to the processed data, data transfer, use of the data

Data may be accessed by person acting for the benefit of the Operator, in particular agents employees, who need this for the performance of their activity and are aware of their obligations related to data processing.

The Operator transfers or makes available to third parties any processed data only if the data subject granted express consent or it is provided by the law.

The Operator uses any data provided by users primarily for identification, liaising, provision and development of services, sending newsletter and advertisements, and research purposes. The Operator is entitled to use anonymised data for statistical purposes.

3.2.2. VízPlusz services for retail customers

- Online application

Users may order various services on the Website, in the “Vízplusz services” menu, for which purpose an online contact form must be completed.

Name and email address are mandatory on the contact form, phone number is to be provided if the User requests a call in connection with the service marked on the form.

If a service is ordered, the Operator processes any personal data provided on the online interface during the five year limitation period after the performance of that service, and then it erases such data from its system. Where no service is ordered, then the Operator retains any personal data provided by the User for six months after the date of the contact.

- Order by using an order form

Vízplusz services available from the Website may be ordered by completing the order form that can be downloaded from the Website. Name/company name, invoicing address, representative (for companies), and tax number (for companies are mandatory data on the order form. Phone numbers must be provided on the order form, since the User is notified by the Operator via the phone number provided of the date when the results can be taken over in the Customer Service.

If any Vízplusz service is ordered, the Operator processes any personal data provided on the order form during the five year limitation period after the performance of that service, and then it erases such data from its system and destructs any hard copy. Where no service is ordered, then the Operator retains any personal data provided by the User for six months after the submission of the order form.

The Operator processes any personal data provided for the purposes of using Vízplusz services exclusively for the provision of the Vízplusz services, it will use such data for other purposes specified in this notice exclusively if the User grants a voluntary consent to this use.

3.2.3. Data processing for marketing purposes

Purpose of Data processing

If the User, on any relevant interface, grants express consent to marketing contacts, then the Operator uses his personal data, e-mail address, phone number, postal address to forward information material, special offers, offers and notices to the User about Fővárosi Vízművek Zrt.'s services related to its water public utility services.

Where the User grants consent to it, the Operator sends to the User advertisement with the direct contact method, and it uses the user data provided for this purpose. This consent covers contacts in email, via the phone, mail, and other methods.

Duration of data processing

For newsletters the Operator processes user data provided upon subscription until the user unsubscribes from the newsletter via the link placed in the newsletter or requests his removal from the list of newsletter subscribers, via email or mail. In the event of unsubscription the Operator sends no more newsletters or offers to the user.

3.2.4. Data processing for market research and opinion research purposes

Purpose of Data processing

If the User grants consent, then the Operator may contact the User, by using the data provided by the user (name, email address, phone number, mailing address) for the purpose of compilation of a research sample with not personal data, for opinion research and market research purposes. Data used for the above defined purposes will be used by the Operator for statistical purposes, in a manner not suitable for identification.

Duration of data processing

The User may withdraw his consent granted for data processing for this purpose at any time, with no restriction and justification. In the event of the withdrawal of the consent granted to the processing of his personal data the Operator will no longer contact the user for market and opinion research purposes by using the contact details provided.

3.2.5. Recording phone calls conducted with customer service

The Operator runs a phone customer service for administration related to water public utility services. This customer service also performs administrative tasks. The Operator records phone calls between the User and the customer service in any case.

The User will be informed of the recording in each case, before starting the conversation.

Purpose of recording phone calls

- completion of customer service tasks, assistance in case management,
- complaint handling,
- fulfillment of applications,
- quality assurance,
- use of the recording in the event of a consumer dispute.

The Operator informs the User about the recording of the conversation both for incoming and outgoing calls, enabling the User to decide whether to consent to the recording of his conversation with the customer service or not. Where the User decides not to grant consent to the recording of the phone call, please hang up and contact the customer service via email or mail.

Duration of data processing

The Operator will store this audio recording for 5 (five) years from the date of recording, then it erases it from the system.

Issuance of audio recordings

Under Section 17/B (3) of Act CLV of 1997 on Consumer protection the Operator records the phone conversation with the data subject, and upon case management via the phone it informs the data subject about storing the recording and its obligation to make the recording available, furthermore about the unique identifier. Both parties are entitled to access the audio recording of the conversation with the data subject, therefore the Operator ensures that the User may access a copy free of charge, within 30 days following the Operator becoming aware of such a User request, provided that he has not submitted any identical request in the current year for the same conversation, in the central customer service office, and to make a copy of that audio recording on a single occasion. Furthermore the Operator makes the copy of that audio recording available electronically, if the User requests so. The User may exercise the above rights jointly or individually.

The Operator provides the copy on a CD or DVD disc to the User, with a copy of its Privacy Notice, and the report on the circumstances of requesting that recording.

The Operator may notify the Operator of his request to issue the audio recording on any customer service channel, by specifying the identifier.

The User may only request the issue of an audio recording, on which it is clearly him having a conversation with the customer service.

3.2.6. Data processing for technical purposes – cookie use

- Technical data

The Operator's system automatically records the IP address of the user's computer, the start time of his visit, and in certain cases and depending on the computer settings, the type of the browser and the operation system. Data recorded in this manner may not be linked to other personal data. Data processing exclusively serves statistical purposes.

- Cookie policy

The Operator places and reads back cookies on the User's computer. (Cookies are text files installed by the Website's web server in the hard disk of the user's computer for later identification of that user. If the browser sends back an earlier saved cookie, the service provider handling that cookie may link the User's current visit to the earlier but only with regard to its own content.)

The Operator uses the following cookies:

- Session cookies: session cookies are automatically deleted after the visit of the data subject. These cookies ensure more efficient and safer operation of the Operator's Website, therefore they are indispensable for the proper operation of certain Website functions or certain applications.
- Persistent cookies: the Operator also uses persistent cookies for better user experience (for example for optimised navigation). These cookies are stored for longer in the browser's cookie file. Its duration depends on the browser settings used by the data subject.
- Security cookies.
- PHPSESSID: php session, the php identifies the user by it; it is active as long as the browser window is open.
- cookies_accepted: this cookie remembers the acceptance of the cookie policy in the footnote; its expiry is 10 years,
- overlay_seen_once: it is a cookie storing the document display in overlay (in order to not to show it several times to the user); its expiry is 10 years.
- banner_rotation: in the event of using a banner block this cookie stores the identifier of the last displayed banner; its expiry is one day.

- voting_*: for remembering participation in a specific vote, with 300 days expiry.

The “Help” function in the menu of most browsers provides information how the data subject may, in his own browser,

- disable cookies,
 - accept new cookies,
 - instruct the browser to set a new cookie, or
 - disable other cookies.
- **Google Adwords**

The Website uses the Google Adwords remarketing monitoring codes. The basis for this is to enable us to contact visitors of the site later with remarketing adverts in the websites within the Google Display network. This remarketing code uses cookies to label visitors. Website users may disable such cookies if they visit the Google ad setting control and follow the instructions provided there. Later on they will not see any personalised offers from the Operator.

- **Cookies placed by Google Analytics**

Google Analytics is the analytic service of Google Inc. (“Google”). Google Analytics analyses user interactions on the Website by using the cookies stored on the users’ computers. The legal basis of web analytics purpose data processing is the voluntary consent of the Website’s user. Analytical cookies are anonymised and aggregated data, on the basis of which individual computers are difficult to identify, however it is not impossible.

Analytical information gathered by Google Analytics cookies are transferred to and stored on Google servers. This information is processed by Google on behalf of the Website’s operator to evaluate users’ website visiting habits, to compile reports on the frequency of Website use, and to provide further use related services to the Operator. In the framework of Google Analytics app IP addresses forwarded via the browser are not linked by Google to other data.

Cookie used: utm*, expiry is two years

For more information about cookies used by Google see: <http://www.google.com/policies/technologies/ads/>

You can read Google’s Privacy Notice here: <http://www.google.com/intl/hu/policies/privacy/>.

3.2.7. Data processing in the Recruitment portal

Data processing in the Recruitment portal aims the search for possible employees for the Operator as company. Data subjects provide data for the purposes of enabling the Operator to establish an employment with it.

Legal basis for data processing is the voluntary consent of the data subject. By providing the data the data subject expressly consents to data processing in accordance with this Notice. Where the data subject has not reached 16 years of age, the consent from his legal guardian is required for data processing, to be obtained by the data subject.

For the Recruitment portal the purpose of data processing is to register job seekers, to provide personalised service to job seekers, to prepare and store a CV and to make it available to Fővárosi Vízművek Zrt. as potential employer, notification to job seekers.

Data provided in the Recruitment portal will be processed by the Operator for 12 month after the last visit. For unconfirmed registration applications the duration of data processing is 30 days.

The data subject is entitled to the deletion of his CV, furthermore to the deletion of his registration in the Recruitment portal.

The Operator is entitled to use all data provided in the Recruitment portal for the purposes of deciding on the employment of the data subject, its possibilities, to examine the data subject's suitability, and to contact the data subject.

Data provided in the Recruitment portal will not be used by the Operator for research and advertisement purposes. For more information on the processing of data provided in the Recruitment portal please see the Privacy Notice on the Recruitment Portal.

3.2.8. Data processing related to surveys and questionnaires on the Operator

For surveys conducted in the www.vizmuvek.hu website, and questionnaires completed in the website the legal basis for data processing is in each case the consent from the data subject. Data subjects grant their consent by providing their data in the survey or questionnaire, being aware of this Notice. By providing the data the data subject expressly consents to data processing in accordance with this Notice.

The Operator determines in its own competence the scope of personal data processed in surveys and questionnaires, subject to compliance with the purpose limitation principle.

The Operator is entitled to use personal data provided in the context of surveys and in questionnaires for research purposes or to send invitations for participation in surveys.

The data subject may request the erasure of personal data provided in the context of surveys and in questionnaires, except if the processing of data is provided for by the law or the data processing is necessary to enforce legal claims.

4. Data processing

Primarily the Operator, and the Operator's internal employees are entitled to access data; they will not publish or disclose them to third parties apart from the cases specified in this Privacy Notice. In accordance with the applicable legislation the Operator is entitled to use data processors for certain technical operations. Data processors are entitled only to implement the Operator's decisions, in line with the Operator's instructions.

During the Website operation the following companies perform data processing activities:

Name: Wildom Informatikai Szolgáltató és Tanácsadó Kft.

Registered address: 1146 Budapest, Hermina út 17, 10. emelet

Email address: wildom@wildom.com

Website: www.wildom.com

Activity: distribution of newsletters to Users, implementation of marketing campaigns

The Operator will not transfer User provided data to its partners.

5. User rights

5.1. Information about and access to personal data

The User is entitled to get to know his personal data stored by the Operator and information about their processing, to verify the data processed by the Operator about him, and to get access to his personal data. Users are required to send their requests for data access to the Operator in writing (via email or mail). The Operator provides the above information to the User in a widely used electronic format. The Operator provides no oral information during the exercise of data access via the phone.

In the event of exercising this access right, the information covers the following:

- determination of the scope of the data processed, purpose, duration, legal basis of data processing with regard to the data processed,
- data transfer: to who the data was or will be transferred later on,
- name of the data source.

The Operator provides a copy of the personal data for the first time free of charge (in person, at the Customer Service). For further copies requested by the User the Operator may charge reasonable costs, based on administrative costs. If the User requests an electronic copy, then information will be made available to the User via email, in a widely used electronic format.

After this information, if the User disagrees with the data processing or the correctness of the processed data, then he may request, in accordance with Section 5, the correction, completion, erasure, restricted processing of his personal data, he may object against the processing of his personal data, or initiate the procedure specified in Section 6.

5.2. Right to correction and completion of processed personal data

Upon the written request from the User the Operator corrects, without undue delay, the unprecise personal data specified by the User in writing or in person, at the Customer Service, and completes incomplete data with the content specified by the User. The Operator informs any addressee about the correction and completion, to whom those personal data were disclosed, unless it proves to be impossible or requires disproportionate efforts. It informs the data subject about the particulars of addressees, if he requests so in writing.

5.3. Right to restriction of data processing

Via a written request the User may request the Operator to restrict the processing of his data if

- the User disputes the precision of those personal data, in this case restriction covers the period necessary for the Operator to verify the precision of those personal data,
- data processing is unlawful, and the User objects against the deletion of the data, and instead he requests the restriction of their use,
- personal data are not necessary for the Operator any longer for data processing purposes, but the User requires them for the purposes of submission, enforcement or protection of legal claims,
- the User objects against data processing: in this case restriction covers the period necessary to establish whether the Operator's legitimate interests are superior to the User's legitimate reasons.

Personal data subject to restriction may be processed, apart from storage, during the restriction period, only with the User's consent, or to submit, enforce or protect legal claims, or in the interest of protecting the rights of another natural or legal person, or from an important public interest of the EU or a Member State. The Operator informs the User, upon whose request it restricted data processing, about the release of the data processing restriction, in advance.

5.4. Right to be forgotten

Upon the User's request, the Operator deletes any personal data on the User, without undue delay, if any of these specified grounds persist: i. those personal data are no longer required for the purpose the Operator collected or otherwise processed them; ii. the User withdrew his consent the data processing is based on and no other legal basis exists for data processing; iii. the User objects against data processing on a ground related to his own situation and no lawful ground exists for data processing, iv. the User objects against the processing of his personal data for direct marketing purposes, including profiling as long as it relates to direct marketing, v. the personal data are unlawfully processed by the Operator; vi. personal data are collected in the context information society services, directly offered to children.

The User may not exercise his right to be forgotten if the data processing is necessary i. for the exercise of the freedom of expression and information; ii. on the basis of public interest in the public health area; iii. for public interest archiving, for academic or historic or statistical purposes, where the exercise of the right to be forgotten would make impossible or seriously compromise that data processing; or iv. for the submission, enforcement, and protection of legal claims.

5.5. Right of data portability

Data portability enables the User to obtain and further use his "own" data provided by him and stored in the Operator's system, for his own purposes and via various service providers. This right is restricted to data provided by the User in any cases, data portability concerning other data (for example statistics, card use data, etc.) is not possible.

Any personal data stored in the Operator's system about the User (provided for example during newsletter subscription):

- is provided to the user in a structured, commonly used and machine-readable format,
- may be transferred by the User to another data processor,
- may be transferred, upon the User's request, to another data processor, if it is technically feasible in the Operator's system.

The Operator fulfils requests for data portability exclusively on the basis of an application sent via email or mail. For the fulfillment of this application the Operator must ascertain whether it is indeed the eligible User intends to exercise this right. For this purpose it is necessary for the data subject to attend at the Customer service in person, after the application, in order to enable the Operator to identify the applicant by using the data it stores in its system. Under this right the User may apply for the portability of his name, email address, phone number, and address data. Exercising this right will not automatically imply the erasure of these data from the Operator's systems, therefore the User may continue to use the Operator's services even after exercising this right.

5.6. Objection against the processing of personal data

The User may object any time, on grounds related to his own situation, against the processing of personal data concerning, including profiling, and the User is entitled to object at any time the processing of his personal data for direct marketing, including profiling. Where the User objects to processing for direct marketing purposes, the personal data may no longer be processed by the Operator for such purposes.

The User may communicate his objection in writing (via email or mail), and for newsletters also by clicking on the unsubscribe link placed in the newsletter.

5.7. Deadline for granting that application

The Operator informs the User about the measures it took without undue delay, but in any case within one month following the receipt of the application referred to in Sections 5.1 to 5.6. If necessary, and taking into account the complexity of the application and the number of applications, this deadline may be extended by a further two months, but in this case the Operator informs the User within one month, by specifying the reasons for the delay. If the User submitted the application electronically, this information is provided by the Operator electronically, unless requested otherwise by the User.

6. Option for the enforcement of rights

The User may exercise his rights through a request sent via email or mail. No rights may be enforced via the phone.

The User may exercise his rights at the contact details of the Data Protection Officer:

Károly Gróf

telephone: 00 36 1 465 2400

fax: 00 36 1 435 3998

e-mail: vizvonal@vizmuvek.hu

Postal address: Fővárosi Vízművek Zrt. 1397 Budapest, Pf. 512

The User will be unable to enforce his rights if the Operator proves that it is not in the position to identify the User. If the User's request is clearly unfounded or excessive (in particular due to its repeated nature), the Operator may charge a reasonable fee for granting that application or refuse to act. The burden of proof lies with the Operator in this context. If there is any doubt on the side of the Operator with regard to the identity of the natural person that submitted the application, it may request further information necessary to confirm the identity of the applicant.

Under the Info Act and the Civil Code (Act V of 2013) the User may contact the National Data Protection and Infocommunication Authority (1125 Budapest, Szilágyi Erzsébet fasor 22/c.; www.naih.hu, hereinafter the Supervisor) or

- a.
- b. Enforce his rights at court.

7. Management of privacy incidents

Privacy incident means any violation of security resulting in the incidental or unlawful destruction, loss, alteration, unauthorised disclosure or unauthorised access to the personal data transferred, stored or processed in any other way. The Operator keeps records, for the purposes of verifying measures related to that privacy incident, information to the Supervisor and the User, which covers the scope of personal data affected by that incident, scope and number of data subjects, the time, circumstances and effects of the incident, and the measures taken to prevent it. If an incident occurs, the Operator informs the User and the Supervisor about the privacy incident without undue delay but within 72 hours at the latest, unless it compromises the rights and freedoms of natural persons.

8. Data security

The Operator takes any measure that can be expected from it for the security of data and it ensures their appropriate protection, in particular against unauthorised access, change, transfer, disclosure, erasure or destruction, and accidental deletion or destruction. The Operator provides for data security by way of appropriate technical and organisational measures.

9. Other provisions

The Controller reserves the right to unilaterally modify this Privacy Notice subject to prior notification to the Users via the website. After the effective date of that modification the User consents to data processing in accordance with the modified Privacy Notice by accepting the notification posted on the Website.

This Privacy Notice is valid as of 25.05.2018.

**Fővárosi Vízművek Zrt.
(Budapest Waterworks Plc.)**