

## **DATA PROCESSING POLICY**

for the processing of personal data carried out by IFKA Industrial Development Public Benefit  
Nonprofit Ltd.

**(More comprehensive and detailed information on such data processing is available on the Data  
Controller's website)**

This policy contains information on the processing of personal data during the registration and unique identification of organizations operating electric charging stations in Hungary on the idro.hu website implemented within the framework of the international project called "IDACS" managed by IFKA Industrial Development Public Benefit Nonprofit Ltd. (hereinafter referred to as: the Project).

### **Legal background**

The data management of the project mentioned above shall be carried out in accordance with the following legislation:

- Regulation No 2016/679 of the European Parliament and of the Council (General Data Protection Regulation or GDPR)
- Act No. CXII of 2011 on the right to informational self-determination and freedom (Information Act)
- Act V of 2013 on the Civil Code (Civil Code)
- The recommendation of the National Authority for Data Protection and Freedom of Information on the data protection requirements for prior notification

### **1. The controller of personal data (hereinafter referred to as: the Data Controller):**

Name of the Data Controller	IFKA Industrial Development Public Benefit Nonprofit Ltd.
Data Controller's representative:	Managing Director Gyula Barta-Eke
E-mail address:	info@ifka.hu
Phone number:	+361 213 2213
Website:	<a href="https://ifka.hu/">https://ifka.hu/</a>
Official Seat:	1062 Budapest Andrásy út 100.
Tax ID number:	23833904-2-42
Data Protection Officer:	dr. Viktor Berényi, lawyer (Phone: +3620 360 2914; email: berenyi.viktor@ifka.hu; official seat: 1126 Budapest, Kiss János altábornagy u. 37. ground floor, door 4.)

### **2. Scope of Data Processing:**

This policy relates to the processing of personal data made available to IFKA in relation to the Project. Including:

- a) personal data provided to or necessarily obtained by the Data Controller during registration,
- b) in the case of a private individual designated by the Data Controller as the contact person, the processing of data based on the former's legal relationship with the Data Controller, and
- c) in the case of a private individual designated as contact person by the registering entities, the processing of data based on contractual relations, where appropriate, between the Data Controller and the Registering entities.

The policy shall not apply to data not pertaining to private individuals.

### **3. The purpose of the data processing:**

To ensure communication for the purposes of registration, the issuing of the individual identification, and communications related to such procedures.

### **4. Personal data processed:**

- a) personal data relating to the representative of the Registering entity,
- b) a private individual designated as contact person:
  - name
  - position
  - phone number
  - e-mail address.

### **5. Legal basis for data processing:**

The legal basis for the processing of personal data in relation to the beneficiary is Article 6(1)(b) of the GDPR: the processing of data pertaining to the performance of a contract and, in relation to the contact persons, is Article 6(1)(f) of the GDPR, whereby the parties have a legitimate interest in communication regarding the support and fulfilling contractual obligations.

### **6. Duration of data processing:**

The duration of data processing shall be 5 years following the expiry of the lifetime of the Project. The application and contact details shall be deleted from the system at the request of the data subject, assuming they do not concern the obligation of the Data Controller to comply with a legal provision or the performance of a contract.

### **7. Data transfer:**

In order to fulfill its legal or contractual obligations arising from its Project tasks, the Data Controller shall and is entitled to transfer the personal data of the data subject to the bodies, organizations and authorities concerned (e.g. Ministry of Innovation and Technology), as specified by law or relevant contracts.

### **8. Access to data:**

The Data Controller shall not transfer the recorded data to third parties, except for requests from judicial authorities.

### **9. Data security measures**

The data disclosed to the Data Controller is partly stored on servers owned and managed by itself, and partly by the following service providers:  
AB Plusz Bt.  
Microsoft Hungary Kft.

The Data Controller shall take appropriate measures to protect personal data, including against unauthorized access and against unauthorized alteration, among others.

### **10. Your data processing related rights:**

- right of access

- right of rectification
- right to erasure (**If you have active personal identification, a new contact person should be designated together with your request for erasure**)
- the right to restrict the processing of data
- the right to be forgotten
- the obligation to notify about restriction of processing
- the right to data portability
- the right to object
- the right to object to direct marketing
- automated decision making in individual cases, including profiling

### **11. Scope of persons entitled to know data**

The Data Controller shall be entitled to have access to the data during the registration procedure, the departments involved in the issue of the unique identifier, especially the staff and management of the departments responsible for the Project, financial management and legal department.

### **12. Automated decision-making and profiling, transfer of personal data to third countries or international organizations**

The processing of personal data shall not entail either of such things.

### **13. Remedies for data processing issues:**

The primary, fastest and most reliable means of remedying such problems is direct consultation between the Data Controller and the data subject through a moderator, if necessary. Therefore, all data subjects are invited to directly contact the Data Controller, its data protection officer, via the contact details disclosed at the beginning of this policy or those found on the Data Controller's website in case of any questions, comments problems or experienced compliance issues.

Where this is not possible because of the nature or the state of the situation, the data subject may also initiate the procedure of the National Authority for Data Protection and Freedom of Information (hereinafter referred to as 'the Authority') in the event of a breach on the part of the Data Controller. Please note the fact that the Authority also recommends that data subjects should first contact the Data Controller in the event of a problem in order to find a peaceful solution, which is, of course, not a mandatory preliminary procedure. The Authority can be contacted through its website at <https://www.naih.hu>, by e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), or by mail: 1530 Budapest, Pf: 5.

The data subject may bring an action before the courts in the event of a breach of his or her rights. The court shall have jurisdiction to hear the claim. The proceedings may also be brought before the court competent in the place of residence or habitual residence of the data subject, at the choice of the data subject.

IFKA Industrial Development Public Benefit Nonprofit Ltd.

Data Controller