

**Information leaflet
about processing personal data**

for contact points and representatives of former and current contractual partners
(hereinafter Data Subject)

Dear Data Subject,

In accordance with Articles 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (hereafter: GDPR), Controller hereby provides the following information for data subjects about the processing of personal data:

	Controller	Data Protection Officer
Name:	Hungarian Gas Storage Ltd	István Kovács
Postal address:	1399 Budapest, Pf. 645	1031 Budapest, Szentendrei út 207-209.
E-mail:	info@mfgt.hu	dpo@mvm.hu
Telephone:	(06-1) 354 - 7050	+36-1-304-2000
Fax:	(06-1) 354 - 7045	
Web	www.magyarfoldgaztarolo.hu	
Registered office:	1138 Budapest, Váci út 144-150.	

Legislation serving as basis for processing

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: "GDPR", the text of the legislation in force is available on the link below:

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ENG&toc=OJ:L:2016:119:TOC)

Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereafter: "Privacy Act"; the text of the legislation in force is available on the link below:

http://njt.hu/cgi_bin/njt_doc.cgi?docid=139257.338504)

Under GDPR "**personal data**":

means any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"recipient":

means a natural or legal person, public authority, agency or another body, to which personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by such public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

PERSONAL DATA

purposes of processing:	in the Appendix
legal basis for data processing:	in the Appendix
period for which personal data will be stored:	in the Appendix
list and categories of personal data:	in the Appendix
source of personal data:	in the Appendix

If the legal basis for processing specified in the **Appendix** is legitimate interest, the legitimate interest is described in the **Appendix**.

In principle, the provision of personal data listed in the **Appendix** depends on the free choice of the data subject. If the provision of personal data listed in the **Appendix** is a statutory or contractual requirement, or a requirement necessary to enter into a contract, the data subject is obliged to provide the personal data listed in the **Appendix**, failing which may have the following legal consequences:

- data request for the purpose of discharging legal obligations: discharging the legal obligation may become impossible
- data request for the purpose of entering into a contract: failure to conclude a contract
- data request for the purpose of using services: refusal to provide services
- data request for security purposes: limit or exclude access

Automated decision-making or profiling

Is it applied by the Controller?	Meaningful information about the logic involved	Significance and the envisaged consequences of such processing for the data subject
No.	Not relevant	Not relevant

RECIPIENT IF APPLICABLE

Name of Recipients	Purposes for which personal data is disclosed
in the Appendix	in the Appendix

WHO CAN ACCESS YOUR PERSONAL DATA?

In principle, the employees of the Controller can access the personal data of the data subjects for the purpose of discharging their duties. So personal data of the data subject can be accessed for example by the Controller’s staff in charge of operating the filing system for administration purposes, or by its procurement/sales staff for preparing contracts. Controller may only disclose the data subject’s personal information to state agencies in exceptional cases. So, for example if a court proceeding is initiated in an ongoing legal dispute between the Controller and the data subject, and the competent court requires the disclosure of documents containing the data subject’s personal data, Controller is requested by the police authority to disclose personal data of the data subject for the purposes of an investigation. Furthermore, for example, personal data may also be disclosed to Controller’s legal counsel providing legal representation in case of a legal dispute between the Controller and the data subject.

DATA SECURITY MEASURES

Controller stores the personal data provided by the data subject at its registered seat or branch. Controller uses the services of the Data Processor indicated in the **Appendix** for processing the personal data of the data subject.

Controller takes the required information security measures to protect the data subject's data inter alia from unauthorized access or from unauthorized alteration. So, for example, any access to data stored on the servers are logged, based on which it can be checked at any time who and when accessed a specific personal data. Controller takes adequate organizational measures to prevent the disclosure of personal data to an undetermined number of people.

DISCLOSURE BY TRANSMISSION TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANIZATION

The name of the third country or the international organization	The Commission's adequacy decision or guarantees	Binding corporate rule (if applicable)	Derogations for specific situations (if applicable)
Not relevant	Not relevant	Not relevant	Not relevant

YOUR RIGHTS

Under article 15 of GDPR, data subjects may request access to their personal data as follows:

(1) The data subject shall have the right *to obtain from the controller confirmation* as to whether or not personal data concerning him or her are being processed, and, where that is the case, *access to the personal data and the following information*:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

(2) The Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Under article 16 of GDPR, data subjects may request rectification of their personal data from the Controller as follows:

The *data subject shall have the right* to obtain from the Controller without undue delay the *rectification* of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Under article 17 of GDPR, data subjects may request the erasure of their personal data from the Controller as follows:

(1) The data subject shall have the *right to obtain* from the Controller the *erasure* of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- (c) the data subject objects to the processing of their personal data in the public interest or in the exercise of official authority or in the legitimate interest of the controller (third party) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law (*Hungarian law*) to which the Controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

(2) Where the Controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, *to inform controllers which are processing the personal data* that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

(3) The *Data Subject's right to erasure may only be restricted* if the following exceptions as per the GDPR subsist, that is where the above grounds apply, further retention of personal data shall be considered as lawful:

- a) for exercising the right of freedom of expression and information, or
- b) for compliance with a legal obligation, or
- c) for the performance of a task carried out in the public interest, or
- d) in the exercise of official authority vested in the controller, or
- e) for reasons of public interest in the area of public health,
- f) for archiving purposes in the public interest, or
- g) for scientific or historical research purposes or statistical purposes, or
- h) for the establishment, exercise or defence of legal claims.

Under article 18 of GDPR, data subjects may request restriction of processing of their personal data from the Controller as follows:

(1) The data subject shall have the *right to obtain from the Controller restriction* of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

- c) the 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; or
- d) the data subject has objected to the processing of their personal data in the public interest or in the exercise of official authority or in the legitimate interest of the controller (third party); pending the verification whether the legitimate grounds of the controller override those of the data subject.

(2) Where processing has been restricted according to the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

(3) A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be *informed* by the Controller *before* the restriction of processing is lifted.

Under article 21 of GDPR, data subjects have the right to object against the processing of their personal data to the Controller as follows:

(1) The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her in the public interest or in the exercise of official authority or in the legitimate interest of the controller (third party), including profiling based thereon. The Controller shall no longer process the personal data unless the Controller 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.

(2) Where personal data are processed *for direct marketing purposes*, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

(3) At the latest at the time of the first communication with the data subject, the right to object shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

(4) In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

(5) Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Under article 20 of GDPR, data subjects have the right to portability of their personal data as follows:

(1) The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent given by the Data Subject, or the performance of a contract
- b) the processing is carried out by automated means.

- (2) In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
- (3) The exercise of the right to data portability shall be without prejudice to the right to erasure. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- (4) The right to data portability shall not adversely affect the rights and freedoms of others.

Under paragraph 3 of article 7 of GDPR, data subjects have the right to withdraw their consent for processing their personal data at any time as follows:

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. It shall be as easy to withdraw as to give consent.

Data subject's right to judicial remedy and to lodge a complaint with a supervisory authority

In the event of unauthorized data processing detected by the data subject, data subject may initiate civil procedure against the Controller. This procedure falls within the scope of regional courts. The procedure – depending on the choice of the data subject – may be initiated at the regional court of the data subject's domicile (for the list and contact information of regional courts, follow the link: <http://birosag.hu/torvenyszekek>)

Without prejudice to other forms of administrative or judicial remedies, every data subject is entitled to lodge complaints with a supervisory authority – especially in the member state of residence, work place or where the suspected breach took place – if the data subject considers that the processing of his or her personal data is in violation of the GDPR.

Hungarian National Authority for Data Protection and Freedom of Information (HNADPFI)

address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c
 postal address: 1530 Budapest, Pf. 5
 e-mail: ugyfelszolgalat@naih.hu
 phone: +36 (1) 391-1400
 fax.: +36 (1) 391-1410
 website: www.naih.hu

Annex: Appendix to the Information leaflet about processing personal data

APPENDIX TO THE INFORMATION LEAFLET ABOUT PROCESSING PERSONAL DATA

	Purpose of processing	Categories of processed data	Period for which the personal data will be processed	Legal basis for data processing	Source of data	Recipient	Purpose of disclosure (if there is a recipient)
1.	Processing personal data relating to documents and electronic systems specified for contract management, with regard to contact points and representatives specified in the contract, in order to prepare contracts in line with legal requirements. Recording, storing, using and deleting data in the electronic data base (contract management system)	Name, position, place of work, contact details	Record management retention period as per contract	Legitimate interest ¹	Contracting party as data controller	MVMI Zrt	IT support
2.	Keeping registry of documents generated during the performance of contracts (protocols, technical documents, official licensing documents etc.), Recording, storing, using, deleting	Name, position, place of work, contact details	Record management retention period as per contract	Legitimate interest ²	Contracting party as data controller	MVMI Zrt	IT support
3.	Recording, storing, using and deleting data in order to manage invoices	Name, position, place of work, contact details	Until the expiry of the limitation period (normally 8 years) following the generation of the document	Legal obligation	Contracting party as data controller	NÜSZ Zrt, MVMI Zrt	accounting service, IT support

¹ Hungarian Gas Storage Ltd has legitimate interest in processing personal data relating to documents and electronic systems specified for contract management, with regard to contact points and representatives specified in the contract, in order to prepare contracts in line with legal requirements.

² Hungarian Gas Storage Ltd has legitimate interest in specifying technical, professional, contractual and commercial contact points in its documents generated during the performance of its contracts.

	Purpose of processing	Categories of processed data	Period for which the personal data will be processed	Legal basis for data processing	Source of data	Recipient	Purpose of disclosure (if there is a recipient)
4.	Keeping registry to ensure contact to business partners and authorities at an organisational unit level; Recording, storing, using, deleting	Name, position, place of work, email address; phone number	5 years following the termination of the legal relationship	Legitimate interest ³	Contracting party as data controller	MVMI Zrt	IT support

³ Hungarian Gas Storage Ltd has legitimate interest in processing the personal data of the contact persons of its business partners and authorities in a registry at an organisational unit level.