

Privacy Notice

on the personal data processed by MVM Otthon Plusz Zrt. in relation to the activities of MVM Bonus Programme

Introduction

The purpose of this Privacy Notice (hereinafter: Notice) is to describe the data process terms of the personal data processes by MVM Otthon Plusz Zrt. (registered office: 1023 Budapest, Árpád fejedelem útja 26-28., company registration number: 01-10-048193) as Controller regarding the bonus programme available from MVM Otthon Plusz Zrt.

1. Description of the Controller, definition of personal data and Data Subject

The Controller means the legal person which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Controller:	MVM Otthon Plusz Zrt. (hereinafter: Controller)
Registered office:	1023 Budapest, Árpád fejedelem útja 26-28.
Postal address:	1023 Budapest, Árpád fejedelem útja 26-28.
Company registration number:	01-10-048193
Website:	www.mvmotthonplusz.hu , https://www.bonuszprogram.hu
E-mail address:	adatvedelem@mvmotthonplusz.hu
Phone number:	+36 20 360 6512
Data Protection Officer:	István Kovács (dpo@mvm.hu)
Company Data Protection Officer (Representative in Data Protection questions):	dr. Tekla Tóth (toth.tekla@mvm.hu)

For the purposes of this Notice, personal data shall mean any information relating to an identified or identifiable natural person (the „**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).

2. The subject matter of this Privacy Notice, legislation under which the processing is performed

This Notice applies to the service related to the bonus programme provided by Controller specified in point 1.).

The data process operations related to bonus programme are the duties of controller and processors.

If You indicate at your sales partner (data processor), or at website of MVM Bonus programme (<https://www.bonuszprogram.hu/>), or at customer service of your Energy Service Provider, or at MVM Ügyfélkapcsolati Kft. (data processor), that you want to join to MVM Bonus programme and You request the agreement shall be extended for You, in addition You shall name and provide the details of the beneficiary(ies) in the event of death and your authorized representative in matters relating to the Bonus Programme Agreement, the Controller shall undertake on the basis of data provided

to record the data and information necessary for concluding the contract, and Controller shall send You – as joined customer – a confirmation of the connection via the communication channel of your, and the relevant terms of agreement.

The sales partner is only entitled to process the personal data necessary for concluding of the agreement during the data process.

The Processors determined in point 9 – on behalf of Controller – are entitled to perform technical operations related to personal data in accordance with the instructions and goals received from the Controller, during this they cannot make decisions on personal data. The identification data of each data processor, the scope of data provided and the list of technical operations shall be updated by MVM Otthon Plusz Zrt. on its website and make it available to anyone. The identity of processors may change during the period of the agreement.

The statement of consent shall be withdrawn at any time, without restriction or justification, free of charge

Main legislation relating to the processing activities above:

- 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 (General Data Protection Regulation)
- Act CXII of 2011 on Informational Self-determination and Freedom of Information
- Act XLVIII of 2008 on basic conditions and certain restrictions of economic advertising activity.
- Act CLV of 1997 on Consumer Protection

3. Legal basis for processing

The legal bases for our processing are **point (a) of Article 6(1) (processing based on consent)** of Regulation (EU) 2016/679 of the European Parliament and Article 6 (1) point f) (legitimate interest).

The details of processing as per each purpose of processing are included in the table in point 12.

4. Purposes of processing

The purposes of processing in relation to the processing activities of Privacy Notice set out herein are specified in detail in the table of point 12.

5. Scope of processed data

Personal data processed by Controller: Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; personal data of beneficiary in case of death: name, birth name, mother's name, date of birth, place of birth, permanent address, postal address, e-mail, data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.

The purposes of processing in relation to the processing activities of Privacy Notice set out herein are specified in detail in the table of point 12.

6. Persons entitled to access data

The persons entitled to access the data under this Privacy Notice are specified in the table of point 12.

7. The period of processing and storing the personal data

The Controllers erase the personal data processed without delay if processing was performed not for the purposes stipulated by law or the purpose of processing no longer exists.

The data processed based on the Data Subject's consent shall also be erased at any time upon the Data Subject's request.

The period of processing under this Privacy Notice is specified in the table of point 12.

8. Security of personal data

The Controller undertakes to ensure the security of personal data processed by it. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the Controller shall implement appropriate technical and organisational measures and develop appropriate procedural rules to ensure the protection of the recorded, stored and processed data and to prevent the destruction, unauthorised use and unauthorised alteration thereof. The Controller also undertakes to request every third party to whom the data are transferred or disclosed based on the Data Subjects' consent to comply with the requirements of the security of personal data.

The Controller shall ensure that the processed data are not accessible to unauthorised persons, and cannot be disclosed, transferred, altered or erased by such persons. The processed data shall exclusively be accessible to the Controllers, their employees and the processor(s) engaged by them based on permission levels, MVM Otthon Plusz Zrt. shall not disclose such data to any third person not entitled to access the data. The employees of the Controller and the Processor may access the processed personal data based on the job roles specified by the Controller and the Processor, in a specified manner and as per the permission levels.

The Controller undertakes to ensure the security of personal data processed by it. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the Controller shall implement appropriate technical and organisational measures and develop appropriate procedural rules to ensure the protection of the recorded, stored and processed data and to prevent the destruction, unauthorised use and unauthorised alteration thereof. The Controller also undertakes to request every third party to whom the data are transferred or disclosed based on the Data Subjects' consent to comply with the requirements of the security of personal data.

The Controller shall ensure a level of security appropriate to the risk, including inter alia as appropriate:

- the pseudonymisation and encryption of personal data,
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services (security in terms of operation and development, intrusion control and detection, prevention of unauthorised access)
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident (prevention of data leak; vulnerability and incident management)
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing (maintenance of business continuity and the protection thereof against malicious codes; secure storage, transfer and processing of data; security-related training of our employees)

In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed

9. Processors

The Processor means a natural or legal person which processes personal data on behalf of the Controller.

The following companies act as data processors (“**Processor**”) in connection with your personal data at both Controllers:

Name and registered office of Data Processor	Activities carried out by Data Processor	personal data processed by Data Processor
Egyesület a Sérült Embe- rekért 4025 Debrecen, Hatvan utca 28. fszt. 2.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother’s name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother’s name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother’s name, date of birth, place of birth, permanent address.
Finance Sales Hungary Kft. 1146 Budapest, Hungária körút 140-144.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother’s name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother’s name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother’s name, date of birth, place of birth, permanent address.
Stonehenge Bankház Kft. 7400 Kaposvár, Fő utca 7.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother’s name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother’s name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother’s name, date of birth, place of birth, permanent address.
Rezsimentor Hungary Zrt. 1146 Budapest, Dózsa György út 23. 2. emelet 13.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother’s name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother’s name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother’s name, date of birth, place of birth, permanent address.

Name and registered office of Data Processor	Activities carried out by Data Processor	personal data processed by Data Processor
Photel Zrt. 7100 Szekszárd, Alkotmány u. 17.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.
Sales Generation Kft. 1036 Budapest, Lajos u. 66.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.
Protocall 2009 Web- és Telemarketing Kft. 2724 Újlengyel, Ady E. u. 41.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.
Ringstone Contact Center Kft. 2724 Újlengyel, Kossuth u. 36.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.
TeleMedia Kft. 1012 Budapest, Márvány u. 17.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.

Name and registered office of Data Processor	Activities carried out by Data Processor	personal data processed by Data Processor
TeleMedia Jobs Kft. 1012 Budapest, Márvány u. 17.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.
Atlasz CC Szolgáltató Kft. 2615 Csővár, Madách utca 1.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.
Fon2Fon Kommunikációs Kft. 2724 Újlengyel, Ady Endre utca 41.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.
MVM Ügyfélkapcsolati Kft. 1081 Budapest, II. János Pál pápa tér 20.	They shall introduce the MVM Bonus Programme to the customers as defined by Controller.	Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address.

The Processors shall be entitled to process the above personal data during the term of its contract concluded with the Controller and for a related period specified by the law.

10. Rights related to data processing and the means of right enforcement and legal remedies available related to processing

10.1. Rights related to processing

The Data Subject may request from the Controller the following:

- information on the processing of personal data concerning him or her (before the commencement of processing and during processing),
- access to the personal data concerning him or her (the provision of his or her personal data by the Controller),
- the rectification or completion of his or her personal data,
- the erasure of his or her personal data and the restriction of processing (blocking) with the exception of mandatory processing,

- the Data Subject has the right to data portability,
- the Data Subject may object to the processing of his or her personal data.

10.1.1. Right to request information (based on Articles 13-14 of the General Data Protection Regulation)

The Data Subject may request the following information in writing from the Controller through the contact details indicated in Section 10.2:

- the processed personal data,
- the legal basis for processing,
- the purpose of processing,
- the source of data,
- the period of processing,
- whether a processor is engaged, and if so, the name, address and processing activity of such processor,
- to whom the Controller has provided access to the personal data, when, based on which law and to which data, or the person to whom it has transferred the personal data,
- the circumstances and effects of any personal data breach and the measures taken to eliminate such data breach.

The Controller shall fulfil the Data Subject's request within one month at the latest by sending a letter to the contact details provided

10.1.2. Right of access (based on Article 15 of the General Data Protection Regulation)

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 processed.

The Controller shall provide a copy of the personal data undergoing processing to the Data Subject if it does not breach any other legal provisions. 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.

10.1.3. Right to rectification and completion (based on Article 16 of the General Data Protection Regulation)

The Data Subject may request the Controller in writing through the contact details indicated in Section 10.2 to modify any of the personal data concerning him or her (e.g. he or she may change his or her email address, phone number or postal address at any time, or may request from the Controller the rectification of the inaccurate personal data concerning him or her and processed by the Controller).

Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete personal data concerning him or her and processed by the Controller completed.

The Controller shall fulfil the request within one month at the latest and notifies the Data Subject thereof in a letter sent to the contact details provided.

10.1.4. Right to erasure (based on Article 17 of the General Data Protection Regulation)

The Data Subject may request the Controller in writing through the contact details indicated in Section 10.2 to erase the personal data concerning him or her.

Basically, the erasure of personal data may be requested if our processing is based on your consent; in such a case, your personal data will be erased.

If the purpose of processing is the performance of the contract in effect, your request to erase cannot be fulfilled.

In such a case, we shall continue to process your personal data under the applicable law even after the termination of the contract until the expiry of the period of processing specified in this Notice.

Where no such obligation exists, the Controller shall fulfil the request within one month at the latest and notifies the Data Subject thereof in a letter sent to the contact details provided for such purpose.

10.1.5. Right to blocking (restriction of processing) (based on Article 18 of the General Data Protection Regulation)

The Data Subject may request the Controller in writing through the contact details indicated in Section 10.2 to block the personal data concerning him or her (by clearly indicating the restricted nature of processing and by performing processing separately from any other data).

Blocking shall be maintained until the reason provided by the Data Subject requires the storage of data.

The Data Subject may request the blocking of data for example where he or she deems that his or her data have been unlawfully processed by the Controller; however, for the purposes of the authority or judicial proceedings initiated by him or her the Controller shall not erase such data.

In such a case, the Controller shall continue to store the personal data (e.g. the submission or personal data concerned) until being contacted by the authority or the court; thereafter the data shall be erased.

10.1.6. Right to data portability (based on Article 20 of the General Data Protection Regulation)

The Data Subject may request in writing through the contact details indicated in Section 10.2 to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format and shall have the right to transmit those data to another controller without hindrance from the Controller, where

- the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) of the General Data Protection Regulation, or
- the processing is based on the contract pursuant to point (b) of Article 6(1), and
- the processing is carried out by automated means.

10.1.7. Right to object (based on Article 21 of the General Data Protection Regulation)

The Data Subject shall have the right to object – in writing through the contact details indicated in Section 10.2 – to processing of personal data concerning him or her which is necessary to enforce the legitimate interests of the Controller or a third party and which is based on point (f) of Article 6(1) of the General Data Protection Regulation, including profiling based on those provisions.

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.

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.

10.2. Means of right enforcement and legal remedies available related to processing

Sending a request to the Controllers

Before initiating judicial or authority proceedings, we recommend you to contact the Controller concerned and send your complaint to it regarding the processing of personal data concerning you to enable us to investigate the case and provide a reassuring solution or to fulfil any of your requests or claims under Section 10.1 if it is reasoned.

In the case of the enforcement of any rights of the Data Subject in relation to processing under Section 10.1, the Data Subject's request for information regarding processing, or his or her objection to or complaint regarding processing, the Controller concerned shall investigate the case without undue delay and within the period specified in current laws, take action in relation to the request and provide information on the case to the Data Subject. That period may be extended as stipulated by law where necessary, taking into account the complexity and number of the requests.

Where the Data Subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject. If the Controller concerned does not take action on the request of the Data Subject, the Controller shall inform the Data Subject without delay and at the latest within the period specified by law of the reasons for not taking action and for refusing to fulfil the request, and on the possibility of initiating judicial or authority proceedings in the case as follows.

If you wish to enforce your rights relating to processing, you have any questions or doubts regarding your personal data processed by the Controller concerned, you wish to request information on your data or lodge a complaint, or you wish to exercise any of your rights under Section 10.1, you may do so through the concerned Controller's contact details listed in Section 1.

Initiation of judicial proceedings

The Data Subject may initiate judicial proceedings against the Controller or – in connection with processing operations falling within the scope of the processor's activity – the processor if in his or her opinion the controller or the processor acting on behalf of or on the instruction of the controller processes his or her personal data infringing the requirements relating to the processing of personal data and set out in the law or binding legal act of the European Union.

The decision in the lawsuit shall fall within the competency of the tribunal. The lawsuit may be filed – at the choice of the Data Subject – before the tribunal competent for the Data Subject's place of residence or place of abode.

Initiation of authority proceedings

In order to enforce his or her rights, the Data Subject may request from the National Authority for Data Protection and Freedom of Information (H-1055 Budapest, Falk Miksa u. 9-11., website: <http://naih.hu>; postal address: H-1363 Budapest, Pf.: 9.; phone: +36-1-391-1400; fax:

+36-1-391-1410; email: ugyfelszolgalat@naih.hu) the initiation of investigation or authority proceedings with reference to the fact that infringement has occurred in relation to the processing of his or her personal data, or there is an imminent risk associated therewith, thus in particular

- if in his or her opinion, the Controller restricts the exercise of his or her rights – as Data Subject – under Section 10.1 or refuses his or her request for the enforcement of such rights (initiation of investigation), and
- if in his or her opinion, during the processing of the personal data concerning him or her, the Controller or the processor acting on behalf of or on the instruction of the Controller violates the requirements relating to the processing of personal data and set out in the law or binding legal act of the European Union (requesting the conduct of authority proceedings).

11. Miscellaneous

This Privacy Notice is available on the <https://www.mvmnext.hu/> website.

The Controller reserves the right to unilaterally modify this Notice with regard to the future

The Controller informs the Data Subjects of such modifications through its website

12. Description of data processing

Description and purpose of processing

Activities in connection with MVM Bonus programme

Controller, persons entitled to access at the Controller

MVM Bonus programme product manager leader expert, CEO, product manager leader expert, product manager leader expert, sales management expert, chief operating officer

Scope of processed data and their source

Counterparty data: customer identification, name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; beneficiary data in case of death: name, name of birth, mother's name, date of birth, place of birth, permanent address, postal / invoicing address, phone number, e-mail, phonogram; data of authorised representative: name, mother's name, date of birth, place of birth, permanent address; the source is primarily the Data Subject legal person (the data provided in the declaration of accession.

Legal basis for processing

The Data Subject's consent – point (a) of Article 6(1) of the General Data Protection Regulation

In case of data process listed by authorized representative and beneficiary of the death the legal basis for the process is the legitimate interest- article 6 (1) (f) of the General Data Protection Regulation

Period of processing and storage

If the Data Subject withdraws his or her consent, the personal data shall be erased without delay, but within 3 (three) days at the latest.

Regarding to Accounting Law Controller shall keep the documents generated in connection with conclusion and registration of the agreement and accounting documents for 8 years.

The Controller shall keep the complaint and the reply to it for 3 years.