

Privacy Notice **(Rules of the Games Annex 1)**

in connection with arrangement of Prize Games and promotions on the personal data processed of the natural persons taking part in the prize games and promotions managed by the member companies of MVM Enterprise Group according to point 1.

Introduction

This Notice shall apply to the process of personal data of natural persons participating in the prize games and promotions (hereinafter together: prize games) voluntarily provided to Controller(s) by the member companies of the MVM Enterprise Group in accordance with point 1 in connection with the arrangement of prize games and promotions. The content of the Notice shall not be applicable to data concerning persons other than natural persons.

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

The Controller means the legal person in the Rules of the Games which, alone or jointly with others, determines the purposes and means of the processing of personal data. In connection with this Notice it is an independent Controller among the member companies of the MVM Enterprise group (hereinafter each member company separately: "**Controller**", together: „**Controllers**”):

Controller:	MVM Energetika Zrt.
Registered office:	1031 Budapest, Szentendrei út 207-209.
Postal address:	1031 Budapest, Szentendrei út 207-209.
Company registration number:	01-10-140263
Website:	www.mvm.hu
E-mail address:	mvm@mvm.hu
Phone number:	+36 1 304 2000
Data Protection Officer:	István Kovács (dpo@mvm.hu)

Adatkezelő:	MVM Services Zrt.
Registered office:	1023 Budapest, Árpád fejedelem útja 26-28.
Postal address:	1023 Budapest, Árpád fejedelem útja 26-28.
Company registration number:	01-10-048351
Website:	www.mvmnext.hu
E-mail address:	info.mvmservices@mvm.hu
Phone number:	+36 30 737 8270
Data Protection Officer:	dr. Józán Flóra (dpo@mvm.hu)

Controller:	MVM Next Energiakereskedelmi Zrt.
Registered office:	1081 Budapest, II. János Pál pápa tér 20.
Postal address:	1439 Budapest, Pf. 700
Company registration number:	01-10-140263
Website:	www.mvmnext.hu/nyitolap , mvmenergiakereskedo.hu , mvmaramkereskedo.hu
E-mail address:	ugyfelszolgalat@mvm.hu
Phone number:	+36 1/20/30/70 474 9999
Data Protection Officer:	dr. Józán Flóra (dpo@mvm.hu)

Controller: **MVM Otthon Plusz Zrt.**
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, mvmbiztositas.hu
E-mail address: adatvedelem@mvmotthonplusz.hu
Phone number: +36 30 737 8270
Data Protection Officer: István Kovács (dpo@mvm.hu)

Controller: **MVM Optimum Zrt.**
Registered office: 1023 Budapest, Árpád fejedelem útja 26-28.
Postal address: 1023 Budapest, Árpád fejedelem útja 26-28.
Company registration number: 01-10-048700
Website: www.mvmoptimum.hu
E-mail address: napelem@mvm.hu
Phone number: +36 20 527 5370
Data Protection Officer: dr. Józsan Flóra (dpo@mvm.hu)

Controller: **MVM Mobiliti Kft.**
Registered office: 1037 Budapest, Montevideo út 2/C.
Postal address: 1023 Budapest Árpád fejedelem útja 26-28.
Company registration number: 01-09-965868
Website: www.mobiliti.hu
E-mail address: mobiliti@mobiliti.hu
Phone number: +36 62 565 758
Data Protection Officer: István Kovács (dpo@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 shall apply to data process in order to fulfil legal and legislative obligation in connection with the use of the products and service of the Controller, the facilitation of the use, and in connection with prize games organized for marketing-communication purposes, the processing of personal data of the Data Subject's natural person(s) participating in them based on the voluntary consent of the Data Subject(s) (If the Data Subject is drawn as the winner in the prize game, in connection with the handover, payment and disbursement of the prize).

The Controllers reserve the right to unilaterally modify this Notice with regard to the future. Data Subject will be notified of such changes on the websites of Controllers.

Your personal data will be processed by the Controller(s) according to point 1 in accordance with the applicable Hungarian and European data protection legislation.

By providing this personal information, You acknowledge that You have read and expressly accepted the version of this Notice in force at the time the information is provided. We shall present the details of data process according to each data process purpose below.

Participation in the prize games is voluntary, based on the Data Subject's decision and free choice. You are entitled to – in case of consent-based data process – withdraw your consent for data process any time.

Main legislation relating to the processing activities and abbreviations used in this Notice:

- 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 (Infotv.)
- Act CLV of 1997 on Consumer Protection (Fgytv.)

3. Legal basis for processing

The legal bases for our processing are Article 6(1) of General Data Protection Regulation

- **point a) (data processing based on Your consent) and**
- **point c) (if the Data Subject is drawn as the winner, data process is necessary for the fulfilment of the legal and legislative obligation with the handover, disbursement and payment of the prize).**

Data Subject is entitled to withdraw his/her consent to the processing and using of his/her data included in point 12/a.) without reason and at any time by e-mail to e-mail address of Controller determined point 1 of this Notice or in a written statement sent to Controller's postal address.

If the Data Subject is drawn as the winner, the withdrawal of the consent shall affect neither the right of the Subject Data Winner to the prize nor the Data Subject's other rights; withdrawal of consent shall not have any adverse consequences on the Winner concerned, however the withdrawal of the consent shall not make the data process before the withdrawal unlawful or invalid, thus the Controller cannot be held responsible for any content or personal data -that may have been previously published and cannot be deleted by the Controller –shared by third parties on web interfaces outside the Controller's control on the internet.

If the Data Subject is drawn as the winner in the prize game, erasure of personal data provided for the purpose of data process necessary for the fulfilment a legal or legislative obligation in connection with the handover, payment of the prize –considering they are not personal data processed with the consent of the Data Subject – cannot be requested, Controller will not be able to fulfil it.

The details of processing are included in the table in point 12 in Miscellaneous.

4. Purposes of processing

Controller shall process the personal data according to point 12/a) for the purpose of the use of the products and services of the Controller, and in connection with the facilitation of the use and information on prize games for marketing communication purposes, their organizing and arranging tasks, making the Data Subject taking part in the prize game possible, keeping contact and drawing prizes.

Prior to the handover, disbursement and payment of the prize, the Controller or Data Processor's employee verifies the identity of the Winner on the basis of the presented document, but does not make a copy of them. The Controller or Data Processor is entitled to request the prior sending of Winner's data according to point 12/b and to check the personal document – to prove the identity of the Winner concerned –before handing over and paying out the prize.

If the Winner shall not provide the necessary data included in point 12/b required for the handover, disbursement and payment of the prize, he/she will lose the right to the prize.

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 and the source of the data

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

Participation in the prize games and during your consent to the processing of your personal data, and (If the Data Subject is drawn as the winner in the prize game, in connection with the handover, payment and disbursement of the prize) for the handover, disbursement and payment of the prize, the Data Subject shall provide his/her personal data to the relevant Controller, so in this case the source of the data is the Data Subject.

6. Persons entitled to access data, the reasons for data transfer

The persons entitled to access data according to the Notice (they are entitled access within the Controller's organization and the external recipients) are listed in the table in point 12.

In case of Processor detailed in point 9, the reason for data transfer by the Controller is that the Processor can perform the data processing activities described in point 9.

7. The period of processing and storing the personal data

The Controllers erase the personal data processed – unless otherwise requested by Data Subject-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 Data Controller concerned (in this point hereinafter: 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. The Controller 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.

In order to ensure the security of the IT systems, the Controller protects such systems with firewall and also uses virus scanner and anti-virus programs in order to prevent internal and external data loss. The Controller has also taken measures to properly check the electronic incoming and outgoing communication to prevent abuse.

The Controller and the Processor deem personal data confidential and process the data as such. In order to ensure the protection of data sets processed electronically in various records, the Controller makes sure that the data stored in the records cannot be directly combined and associated with the user, with the exceptions stipulated by law.

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 –indicated in the rules of the game- act as data processors (hereinafter as "**Processor**") in connection with your personal data :

- **MVM Energetika Zrt. at Controller:**

Name, Registered office of Data Processor	Activities carried out by Data Processor	Personal data processed by Data Processor
MVM Services Zrt. (1023 Budapest, Árpád fejedelem útja 26-28.)	Organizing and managing of prize games	Depending on the prize game: <ul style="list-style-type: none"> • full name • address/notification address or • E-mail address or • Phone number/mobile Phone number • if required, any additional personal information is required to participate in an individual prize game (e.g. personal data available on the Facebook profile of the Data Subject participating in the prize games etc.), additional personal data detailed in the Game Rules of the given prize game • winner's place and date of birth • winner's tax identification number • recording of the winner

- **At MVM Next Energiakereskedelmi Zrt. Controller:**

Name, Registered office of Data Processor	Activities carried out by Data Processor	Personal data processed by Data Processor
MVM Services Zrt. (1023 Budapest, Árpád fejedelem útja 26-28.)	Organizing and managing of prize games	<ul style="list-style-type: none"> • full name • address/notification address or • E-mail address or • Phone number/mobile Phone number • the number of customer contracts of Data Subject (personal or electronic customer service) • number of the services used • invoice information (invoicing and payment information, invoice payment history) • gas- and/or electricity-consumption data • if required, any additional personal information is required to participate in an individual prize game (e.g. personal data available on the Facebook profile of the Data Subject participating in the prize games etc.), additional personal data detailed in the Game Rules of the given prize game • winner's place and date of birth • winner's tax identification number • recording of the winner

- **At MVM Otthon Plusz Zrt. Controller:**

Name and registered office of Data Processor	Activities carried out by Data Processor	Personal data processed by Data Processor
MVM Services Zrt. (1023 Budapest, Árpád fejedelem útja 26-28.)	Organizing and managing of prize games	<ul style="list-style-type: none"> • full name • address/notification address or • E-mail address or • Phone number/mobile Phone number • the number of customer contracts of Data Subject (personal or electronic customer service) • number of the services used • invoice information (invoicing and payment information, invoice payment history) • gas- and/or electricity-consumption data • if required, any additional personal information is required to participate in an individual prize game (e.g. personal data available on the Facebook profile of the Data Subject participating in the prize games etc.), additional personal data detailed in the Game Rules of the given prize game • winner's place and date of birth • winner's tax identification number • recording of the winner

- **At MVM Optimum Zrt. Controller:**

Name and registered office of Data Processor	Activities carried out by Data Processor	Personal data processed by Data Processor
MVM Services Zrt. (1023 Budapest, Árpád fejedelem útja 26-28.)	Organizing and managing of prize games	<ul style="list-style-type: none"> • full name • address/notification address or • E-mail address or • Phone number/mobile Phone number • the number of customer contracts of Data Subject (personal or electronic customer service) • number of the services used • invoice information (invoicing and payment information, invoice payment history) • gas- and/or electricity-consumption data • if required, any additional personal information is required to participate in an individual prize game (e.g. personal data available on the Facebook profile of the Data Subject participating in the prize games etc.), additional personal data detailed in the Game Rules of the given prize game • winner's place and date of birth • winner's tax identification number • recording of the winner

- **At all Controllers:**

Name and registered office of Data Processor	Activities carried out by Data Processor	Personal data processed by Data Processor
MVM I Zrt. Székhely: 7030 Paks, Vasút utca 1. Cégjegyzékszám: 17 10 001240	Providing IT services to the Controller, storing data.	All data related to electronic data storage in connection with the given prize game.

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 in point 12.

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 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.

10.1.1. Right to request information (based on Article 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. A 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, e.g. Data Subject gave his/her consent; (e.g. Phone number, E-mail address) his/her data shall be processed for contact purposes. In such a case, your personal data will be erased.

If we process the Data Subject's personal data for the purpose of handing over the prize, stating the identity of the winner(s), fulfilling the obligation to declare prize tax, or verifying the legality of voucher system, we will not be able to fulfil your cancellation request. 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 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. Regarding to the legal bases for data processing in accordance with this Notice, the rights of Data Subject are not relevant for the purpose of this Notice.

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

During the processing of personal data detailed herein automated decision-making, profiling and the transfer of the personal data to third countries or international organisations are not performed

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	Legal basis for processing	Scope of processed data and their source	Period of processing	Persons entitled to access the data at the given Controller and at the external recipient (mostly at Data Processor detailed in point 9)
<p>a.) By using the products and services of the certain Controller, by facilitating of the use, and information on prize games for marketing-communication purposes, their organizing and arranging tasks, making the Data Subject taking part in the prize game possible, keeping contact and drawing prizes</p> <p>Recording of the Winner upon receiving the prize may be used by the Controller for communication related to the prize.</p>	<p>Data Subject's consent [article 6. (1) point a) of the General Data Protection Regulation</p>	<p>Basic data:</p> <ul style="list-style-type: none"> • full name • address/notification address or • E-mail address or • Phone number/mobile Phone number <p>optionally processed data sets depending on the prize game:</p> <ul style="list-style-type: none"> • the number of customer contracts of Data Subject (personal or electronic customer service) • number of the services used • invoice information (invoicing and payment information, invoice payment history) • electricity-consumption data • gas-consumption data. <p>if required, any additional personal information is required to participate in an individual prize game (e.g. recording of the winner, image, personal data available on the Facebook profile of the Data Subject participating in the prize games etc.), additional personal data detailed in the Game Rules of the given prize game.</p>	<p>Not later than the 30th (thirtieth) day after the end of the prize draw, or in case of winning, until the prize is handed over (after that) the rules included in point b.) are the authoritative).</p> <p>Recordings of the winner will be processed by the Controller for 1 (one) year or until the withdrawal of the consent, which does not apply to recordings previously excluded from the scope of the Controller.</p> <p>If Data Subject withdraws his/her consent or/and objects to processing of his/her data for the purpose indicated in the first column, or the above mentioned periods passed, then the personal data must be erased immediately as described in this Notice .</p> <p>Withdrawal of consent or object to data process shall result the termination of the Data Subject's opportunity to participate in the prize draw (that is, he/she will be disqualified from the prize draw and he/she will also lose his/her entitlement to the prize).</p>	<p>on behalf of MVM Otthon Plusz Zrt.: discount program manager, insurance product manager, sales channels and CRM manager and promotion-organizing expert</p> <p>on behalf of MVM Next Energia-kereskedelmi Zrt.: employees dealing with product management, data analysis</p> <p>on behalf of MVM Optimum Zrt.: employees dealing with product development and energy efficiency, deputy economic chief officer, legal director</p> <p>MVM Services Zrt. data processor employees dealing with organizing and arranging prize games.</p> <p>MVMI Zrt. data processor employees dealing with IT operation.</p>

<p>b.) Proof of the identity of the winner(s)/ (replacement winner(S) for handover and payment of the prize(s), fulfilment of the prize tax and any other tax return and payment obligations, verification of the legality of the voucher system.</p>	<p>Fulfilment of legal and legislative obligation [article 6.(1) point c) of the General Data Protection Regulation)</p>	<ul style="list-style-type: none"> • full name • address/notification address • winner's place and date of birth • winner's tax identification number 	<p>Controller shall keep Winner(s)'s personal data for 8 (eight) years, which is necessary to verify the declaration and payment of prize money or other taxes and the legality of the voucher system after the handover, payment and disbursement of the prize .</p>	<p>Controllers and/or competent employees of the workers, financial, accounting and tax departments of Processors detailed in point 9. organizing and arranging prize games</p> <p>The Controller forwards the personal data required for declaring and paying prize or other tax to NAV (tax office) or other authorities specified by law.</p>
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