

# PRIVACY NOTICE



**25 May 2018**

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Magyar Posta Zrt is committed to protecting the data of data subjects who contact them and to duly inform them of the processing of their personal data.

In our Privacy Notice we detail

- the basis entitling Magyar Posta Zrt to process data (legal basis),
- the type of data we process,
- why we process data and what the data are used for (the purpose of data processing),
- how long data are processed (the duration of data processing),
- if we use data processors, or if we transfer the data subject's data,
- who may access the data,
- the rights data subjects may exercise concerning their data,
- and the legal remedies they may resort to.

This information may vary depending on the purpose the data subject gave the data for. A large organisation like Magyar Posta processes data for a variety of purposes. Some of these purposes are defined in legislation while others we need in order to provide our services in the way our customers expect.

Because data subjects come into contact with Magyar Posta Zrt when they use specific services or use a postal service, in this Privacy Notice **the relevant information for each service or area is provided** under separate headings to make it easier for the data subjects to find out which data are processed on each occasion.

We wish to inform data subjects that information about specific data processing carried out by Magyar Posta Zrt is detailed in the individual information provided when or before data are recorded (for example, on the form for recording data), in a contract, in the general terms and conditions for the service, in notices and on the [www.posta.hu](http://www.posta.hu) Privacy Notice page, under the Related Information menu point.

## 1. Data controller

Magyar Posta Zrt (Registered office: 1138 Budapest, Dunavirág street 2-6, Company register number. 01-10-042463, tax number: 10901232-2-44, correspondence address: 1540 Budapest, website: [www.posta.hu](http://www.posta.hu)) is the data controller with regard to all data processing described in this document.

Contact us:

- by post: Addressed to the Customer Service Directorate: 3512 Miskolc,
- by fax: (+36) 46-320-136,
- by e-mail: on the [ugyfelszolgalat@posta.hu](mailto:ugyfelszolgalat@posta.hu) e-mail address,
- by phone: on (+36) 1-767-8282,



- in person: at Magyar Posta Zrt, Budapest, District X, Üllői út 114-116., and stationary post offices operated by Magyar Posta,
- data protection officer: adatvedelem@posta.hu

The privacy notice is available online on the website [www.posta.hu](http://www.posta.hu) under the Privacy Notice menu point.

## **2. Magyar Posta as a postal operator (letters, parcels):**

### **2.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

Magyar Posta is entitled to process data in connection with its postal services, as in its activities related to dispatching, collecting, sorting, transporting and delivering letters and parcels on the following basis:

- the processing of personal data is necessary for the performance of a public interest task, for which Magyar Posta Zrt, as a universal postal service provider, was designated pursuant to Section 6 and 18 of Act CLIX of 2012 on Postal Services (hereinafter: Postal Services Act) [Article 6 (1) b) of the Regulation of the European Parliament and of the Council (EU) 2016/679 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 (hereinafter: General Data Protection Regulation)]
- during the performance of postal services that fall outside the scope of universal postal services
  - the processing of the sender's personal data is necessary for the conclusion and performance of the postal service contract, which is concluded between the sender and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)]
  - while the processing of the personal data of addressees and recipients is necessary for the validation of the legitimate interest of the sender as well as Magyar Posta Zrt, which is demonstrated by the fact that without it, the performance and certification of the contract would not be possible under the statutory terms and conditions for the fulfilment of postal services [General Data Protection Regulation, Article 6 (1) f)]
- Section 54 of the Postal Services Act specifies the detailed rules of data processing
- the processing of personal data for the handling of customer claims relating to postal services is necessary for the validation of the legitimate interest of Magyar Posta Zrt, which is demonstrated by the fact that without the processing of the data the customer claims could not be investigated, answers could not be sent to the data subjects and it would be impossible to process and handle the indications of data subjects, which would undermine the

legitimate economic interests of Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) f)]

- in relation to complaints, statements to be recorded as complaints and compensation claims the legal obligations for data processing are provided by Section 57 of Act CLIX of 2012 on Postal Services and Sections 17/A-17/C of Act CLV of 1997 on Consumer Protection [General Data Protection Regulation, Article 6 (1) c)]

In international mail traffic, it is necessary to transfer the personal data to the addressee country. The data transfer

- in the case of the personal data of the sender, is necessary for the performance of the contract between the data subject and the data controller Magyar Posta Zrt, or for the implementation of pre-contractual measures taken at the data subject's request [Article 49 (1) b) of the General Data Protection Regulation]
- while in the case of the recipients personal data it is necessary for the conclusion and fulfilment of the contract serving the recipient's interest, concluded between Magyar Posta Zrt as data controller and the sender [General Data Protection Regulation, Article 49 (1) c)]

The Universal Postal Union was established out of public interest due to international postal traffic and the need to operate the universal postal service, the rules and regulations of which govern the processing of data concerning international postal traffic. Therefore transferring personal data accordingly is necessary for important reasons of public interest [General Data Protection Regulation, Article 49 (1) d)]

- the Constitution of the Universal Postal Union in force and its Agreements (the 'UPU Convention') – Law Decree No. 26 of 1967 on the enactment of the Constitution of the Universal Postal Union signed at Vienna on 10 July 1964 and the Additional Protocols to the Constitution; Act CXIII of 2012 on the enactment of the Seventh and Eighth Additional Protocols to the Constitution of the Universal Postal Union, the Universal Postal Convention of the Universal Postal Union consolidated with the amendments signed at the 2004 Bucharest Congress and the 2008 Geneva Congress, the Final Protocol of the Universal Postal Convention signed at the 2004 Bucharest Congress and the 2008 Geneva Congress, and the Postal Payment Services Agreement consolidated with the amendments signed at the 2004 Bucharest Congress.

The following documents also include provisions related to data processing:

- Government Decree No. 335/2012 (4 December) on the detailed rules for the provision of postal services and postal service related to official documents, as well as on the general terms and conditions of postal service providers, and on

items excluded from postal services or items that may only be carried upon certain conditions (hereinafter: Gov. Dec.)

- the Universal Postal Public Service Contract.

Magyar Posta Zrt. is the universal postal service provider, in other words the Hungarian State has entrusted Magyar Posta with the delivery of letters and parcels throughout the country. The contract describes the terms and conditions in detail.

The legal rules listed above ensure that postal services operate in a unified system throughout the world. We would not be able to send a letter or parcel to the other side of the world if this process were not regulated by the UPU Convention, and neither could Magyar Posta transfer the necessary data, either related to the performance of the service or learnt in the course of performing it, to the other side of the world.

## 2.2. What type of data do we process?

data	Why?
sender's and addressee's name [Gov. Dec., Sections 4 and 7]	<ul style="list-style-type: none"> <li>– for the delivery of the mail item</li> <li>– when an agreed delivery time is arranged, we process the addressee's name also for the purpose of recording the delivery time.</li> <li>– for reimbursing the sender the amount collected during delivery following payment or the payment of goods.</li> </ul>
sender's and addressee's address [Gov. Dec., Sections 4 and 7]	<ul style="list-style-type: none"> <li>– for the delivery of the mail item</li> <li>– when an agreed delivery time is arranged, we process the addressee's address also for the purpose of recording the delivery time.</li> </ul>
number of the recipient's identity document [Postal Services Act, Section 41 (10)]	to prove the identify of the person receiving with delivery in person
type of the recipient's identity document [Postal Services Act, Section 41 (10)]	to prove the identify of the person receiving with delivery in person
e-mail address [Gov. Dec., Section 25(4)]	to communicate notifications about the mail item
telephone number [Gov. Dec., Section 25(4)]	to communicate notifications about the mail item

recipient's signature [Gov. Dec., Section 22(5)]	to prove receipt
legible name of recipient [Gov. Dec., Section 30(1)]	to prove receipt of an official document and the identity of the recipient
recipient's address [Gov. Dec., Section 30(2)]	to prove delivery of an international official document delivered in Hungary
witness's signature [Gov. Dec., Section 26(1)]	to prove delivery to persons who are illiterate, have no knowledge of Roman script, are blind or are unable to write for other reasons
reason for non-delivery [Gov. Dec., Section 25]	information for the sender
entitlement to receive mail [Gov. Dec., Section 22(5)]	to record the recipient's entitlement to receive
in the case of an authorised representative: 'mh' mark	to record the recipient's entitlement to receive
for an alternative or occasional recipient, data concerning the relationship between the recipient and the addressee	to record the recipient's entitlement to receive
spouse, lineal relative; adoptive, step or foster child; adoptive, step or foster parent; a brother or sister; domestic partner; the spouse of a lineal relative; the lineal relative and brother or sister of the spouse, or the spouse of a brother or sister [Gov. Dec., Section 16(3)(a)]	to record the recipient's entitlement to receive
the landlord of the property at the address or the person providing accommodation to the addressee provided they are natural persons [Gov. Dec., Section 16 (3) (b)]: 'landlord', 'host'	to record the recipient's entitlement to receive
employee not authorised to represent an organisation, in the capacity of an occasional recipient [Gov. Dec., Section 15 (4)], indicating this capacity: 'employee'	to record the recipient's entitlement to receive
neighbour, in the capacity of an occasional recipient [Gov. Dec., Section 16 (4)], indicating this capacity: 'neighbour'	to record the recipient's entitlement to receive
indicating capacity as an adult witness: 'witness' [Gov. Dec., Section 26 (1)]	to record the recipient's entitlement to receive

collected amount	for reimbursing the sender the amount collected during delivery following payment, international cash on delivery or the payment of goods.
bank account number	reimbursement of the collected amount to the sender, to the bank account specified by the sender
mail item identifier	for the delivery of the mail item

Magyar Posta may acquaint itself with the contents of sealed mail items to the extent necessary to carry out the service. [Postal Services Act, Section 55]

However, circumstances can arise when opening a mail item is unavoidable:

- a. the contents of a mail item pose a threat (for example, it contains an explosive, flammable or infectious substance) which must be eliminated
- b. the packaging of a mail item is damaged to the extent that it is necessary to repack to prevent damage to the contents or to other mail items
- c. a mail item cannot be returned to the sender for some reason and
  - the contents of the mail item are probably perishable or hazardous, or
  - a parcel has been held by Magyar Posta for three months and during this period neither the sender nor the addressee came forward for it.

In every case Magyar Posta records the fact that the mail item was opened on its cover and, whenever possible, notifies the sender of the opening and the reason for it.

The Postal Services Act also allows Magyar Posta to examine *unsealed mail items* to the extent necessary in the interest of establishing the data needed for acceptance, collection, sorting, forwarding and delivery. Such mail items include postcards and picture postcards.

In the case of air transport the contents of export (outgoing) postal packages of companies licensed to operate at the airports, such as Magyar Posta Zrt, are also subject to aviation security controls in accordance with statutory obligations (NAVSEC program, EC Regulation No. 300/2008, Commission Regulation (EC) No. 2015/1998, Government Decree No. 169/2010 (11 May)). Magyar Posta uses x-ray equipment for such control. Checking the contents primarily aims to detect devices that threaten flight safety (for example, firearms, pointed weapons, articles that could be used as a weapon, explosive and inflammable devices).

### **2.3. For what purpose do we process data?**

- to fulfil the postal service contract

We process data in order to deliver letters and parcels to their addressees in compliance with the rules that apply to us – set by the sender and the addressee or defined by law. Our convenience services that adapt sending letters and parcels to individual needs may also be used. For example:

- With the e-notification and e-arrival of our P.O. Box services, a notification of the delivery of the mail item is sent to the e-mail address or phone number given by the data subject.
  - If redirection is required, we process the new address on the redirection form (where it is requested that the item be redirected) so that mail items will reach the addressee at the desired place for a temporary period.
- to account, prove and subsequently check performance
- The data are required to prove to senders that their mail item was delivered in accordance with their instructions and to ensure that everything occurred correctly. At the same time, it is important to be able to investigate complaints and claims for compensation, which we could not do without processing the data necessary to deliver letters and parcels.
- to be able to supply data upon request
- to supply data to the National Media and Infocommunications Authority
- The National Media and Infocommunications Authority supervises our Company's postal services, thus we must supply information, in part related to complaints, to the Authority.
- Moreover, we are obliged under Section 38 of the Postal Services Act to supply information to the organisations authorised to prevent and investigate crime (for example, the police), to gather intelligence or to obtain confidential data. The specific conditions under which this may happen are laid down in Government Decree No. 9/2005 (19 January) on the detailed rules of cooperation between postal service providers, postal contractors, and organisations authorised to gather intelligence in secret and to obtain confidential data (such as the Special Service for National Security).

#### **2.4. How long do we process the data?**

Personal data may be processed until the end of the calendar year after the date of acceptance of a mail item, in other words the time it is posted, unless the Postal Services Act sets another time-limit or the person using the service or the addressee of the mail item instructs otherwise. If, for instance, the data subject posted a letter with advice of delivery on 8 October 2017, Magyar Posta Zrt would process the data related to its dispatch and delivery until 31

December 2018. However, the sender may request that we process the data related to him or her for longer, as may the addressee.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

## **2.5. Do we use data processors?**

Magyar Posta provides its postal services with the aid of postal contractors at many points in Hungary. Postal contractors are undertakings that are contracted by Magyar Posta to provide postal services for customers in the name of, for and at the liability of Magyar Posta as well as applying the rules laid down by Magyar Posta. The postal contractors are accordingly the data processors of Magyar Posta Zrt. If you would like to view the list of postal contractors, you can access it on the [www.posta.hu](http://www.posta.hu) page under the Privacy Notice menu point.

International mail service would be unable to function without the cross-border flow of the personal data of data subjects. This is ensured by the International Post Corporation SCRL (hereinafter: 'IPC') (Belgium 1130 Brussels, Avenue du Bourget 44, [cape.helpdesk@ipc.be](mailto:cape.helpdesk@ipc.be), <https://www.ipc.be>) and the Universal Postal Union (POB 312 3000 BERNE 15 Switzerland, [ptc.support@upu.int](mailto:ptc.support@upu.int), [www.upu.int](http://www.upu.int)), which Magyar Posta also uses as data processors. The IPC and the Universal Postal Union provide the IT support enabling the international exchange of data and operate the IT infrastructure facilitating the data exchange between postal operators and air carriers.

## **2.6. Who may access the data?**

Magyar Posta processes personal data allowing access only to those who need them to carry out the service you require. Thus staff involved in forwarding mail items (post office clerks, sorting and delivery personnel) as well as those involved in checking the performance of the service, accounting and examining complaints have access to the data of mail items. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties. In addition, the personnel involved by Magyar Posta's subcontractors and postal contractors as data processors in carrying out the activity may also access data.

It is our legal obligation to disclose or provide access to data to the National Media and Communications Authority [Postal Services Act, Section 53], the

court, prosecutor's office, the investigating authority, the offence authority, the administrative authority, the National Authority for Data Protection and Freedom of Information and any other body authorised by law, upon their request. We are obliged to cooperate with the organisations authorised to prevent and investigate crime, and to gather intelligence in secret. [Postal Services Act, Section 38 and Government Decree No. 9/2005 (19 January)] Magyar Posta only provides personal data to or allows access for these organisations if the precise purpose and data range is indicated and only does so to the extent that is absolutely necessary for the purpose of the request and is suitable to achieve the objective.

If the data subject sends a mail item (letter or parcel) abroad, Magyar Posta Zrt is obliged to transfer those pieces of the data listed in point 2.2 which are necessary for the performance of the service to the postal operator in the destination country (the country which appears in the address of the mail item) and to the postal operator in the transit country (the country to which the mail item is first sent for onward shipment to the destination country) as the service could not be carried out without this.

### **3. Magyar Posta as a postal financial service provider**

Magyar Posta comes into contact with its customers not only as a postal service provider but also as a provider of financial services governed by certain rules applicable to this area. Data subjects can pay their postal payment order ('yellow cheque') and their postal bill payment orders ('white cheque') at post offices, or by using our iCsekk application or the cheque payment terminals operated by Magyar Posta Zrt, and domestic postal money orders ('pink cheque') can also be sent from post offices. Our extensive network allows us to take cash to the door by means of the domestic postal money order, outpayment order and pension order.

#### **3.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

Magyar Posta is entitled to process data on the following basis:

- The processing of personal data is necessary for the performance of a public interest task, since Magyar Posta Zrt., as a universal postal service provider, was obliged by the legislator to provide
  - postal payment order ('yellow cheque'),
  - postal bill payment order ('white cheque'),
  - domestic postal money order ('pink cheque'),
  - outpayment order (and its subtypes: pension order) and
  - cash withdrawal order



services pursuant to Section 26 of the Postal Services Act [General Data Protection Regulation, Article 6 (1) e]]

- The conditions for the provision of services at the legislative level are specified in Act LXXXV of 2009 on the Provision of Payment Services (hereinafter: Payment Act).

Under the cited law, the following documents also include provisions related to data processing:

- MNB Decree No. 35/2017. (14 December) on the Execution of Payments (hereinafter: Payment Dec.)
- Government Decree No. 335/2012 (4 December) on the detailed rules for the provision of postal services and postal service related to official documents, as well as on the general terms and conditions of postal service providers, and on mail items excluded from postal services or items that may only be delivered under certain conditions (hereinafter: Gov. Dec.)

These regulations provide the framework for sending money to the addressee using the postal payment order ('yellow cheque'), the postal bill payment order ('white cheque'), the domestic postal money order ('pink cheque'), the outpayment order and the cash withdrawal form. Magyar Posta is obliged to process the data required by these regulations and these must be provided to enable us to perform the service.

- Regulation (EU) No. 2015/847 of the European Parliament and of the Council (20 May) 2015 on Information Accompanying Transfers of Funds and Repealing Regulation (EC) No. 1781/2006 (2015/847/EU r.)<sup>1</sup>, which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c]]

Strict rules govern service providers in the financial world in order to ensure that the flow of funds can be monitored. For this reason the European Union requires service providers, and thus Magyar Posta as well, to be able to trace the funds flowing through their services to the person placing the order to transfer the funds. In this context data must be transferred to the service provider receiving the funds from Magyar Posta. Magyar Posta must process the data and these must be provided to enable us to perform the service.

- Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: AML Act) and Act LII of 2017 on the Implementation of Financial and Asset Restraint Measures Imposed by the

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<sup>1</sup> for data recorded prior to 26 June 2017 Regulation (EU) No. 1781/2006 of the European Parliament and of the Council (15 November) on Information on the Payer Accompanying Transfers of Funds

European Union and the UN Security Council (hereinafter: RM Act), <sup>2</sup>which create a legal obligation for the processing of the data [General Data Protection Regulation, Article 6 (1) c]

In order to prevent money laundering and terrorist financing, Hungary, too, requires that the data which enable the transfer of funds to be traced be recorded so that persons laundering money and financing terrorism can be identified. Magyar Posta must record such data and in certain cases transmit them to the authorities. If it did not do this, it could not provide the service.

- Section 24 of Act CXXXIX of 2013 on the Magyar Nemzeti Bank (hereinafter: MNB Act), which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c]

Under the cited law, the following documents also include provisions related to data processing:

- Sections 14-16 and Annex 4 of MNB Decree No. 11/2011 (6 September) on the Processing and Distribution of Banknotes and on Technical Tasks Relating to the Protection of Banknotes Against Counterfeiting
- Sections 6-8 and Annex 2 of MNB Decree No. 12/2011 (6 September) on the Processing and Distribution of Coins and on Technical Tasks Relating to the Protection of Coins Against Counterfeiting

These rules are intended to detect counterfeiters and to enable Hungary's central bank, the Magyar Nemzeti Bank, to withdraw counterfeit money. However, identifying counterfeit money is a technical task, and it sometimes happens that money which appears counterfeit is real. In order to return the value of the money thus withdrawn and found after the Magyar Nemzeti Bank's technical examination not to be counterfeit to the rightful owner, the person intending to pay with the suspected counterfeit money needs to be recorded. Magyar Posta has to record these data and transmit them to the Magyar Nemzeti Bank.

- Act C of 2000 on Accounting (hereinafter: Accounting Act), which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c]

Magyar Posta must account for money received from customers accurately, thus it is obliged to keep documents and data proving this.

### **3.2. What type of data do we process?**

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<sup>2</sup> For data recorded prior to 1 January 2018, Act CXXXVI of 2007 on the Prevention and Combating of Money Laundering and Terrorist Financing

### 3.2.1. Postal payment order ('yellow cheque') or postal bill payment order ('white cheque')

When customers use our postal payment order ('yellow cheque') or postal bill payment order services ('white cheque'), we may ask for the data below or may link the following information to the payments.

data	Why?
payer's name and their name at birth [Payment Act, Section 49; Payment Dec., Section 49; Regulation (EU) No. 2015/847, Article 4; AML Act, Sections 7-9 and 14 (3); MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>- to make the payment</li> <li>- to identify the payer</li> <li>- to track the flow of funds</li> <li>- to prevent money laundering and terrorist financing</li> <li>- to identify the payer with suspected counterfeit banknotes or coins</li> </ul>
payer's address [Payment Act, Section 49; Regulation (EU) No. 2015/847, Article 4; AML Act, Sections 7-9; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>- to make the payment</li> <li>- to identify the payer</li> <li>- to track the flow of funds</li> <li>- to prevent money laundering and terrorist financing</li> <li>- to identify the payer with suspected counterfeit banknotes or coins</li> </ul>
name and address of the beneficiary [Payment Dec., Section 49; Regulation (EU) 2015/847, Article 4]	<ul style="list-style-type: none"> <li>- for payment</li> <li>- to identify the person authorised</li> <li>- to track the flow of funds</li> </ul>
account number of the beneficiary [Payment Dec., Section 49; Regulation (EU) 2015/847, Article 4]	<ul style="list-style-type: none"> <li>- for payment</li> <li>- to track the flow of funds</li> </ul>
information in the notes section marked by the service providers or payers [Payment Dec., Section 49]	to communicate information considered important by the payee and/or the payer (does not have to be given)
amount [Payment Act, Payment Dec.]	for payment
payer's identifier (the identification used by the service providers and marked on the payment form) [Payment Dec., Section 49]	reference identifying the payer for the payee (not compulsory)
date of invoice and its due date (when using the iCsekk application)	to sort and identify the payer's bills
date and time of payment [Payment Act, Section 10]	<ul style="list-style-type: none"> <li>- as proof of payment,</li> <li>- to track payment</li> </ul>
place of payment (name of PO,	<ul style="list-style-type: none"> <li>- as proof of payment,</li> </ul>

number of terminal, iCsekk application)	– to track payment
payment ID [Regulation (EU) 2015/847, Article 4]	to identify payment and trace it back to the payer
citizenship [AML Act, Sections 7-9]	to prevent money laundering and terrorist financing
date and place of birth [AML Act, Sections 7-9 and 14 (3)]	<ul style="list-style-type: none"> <li>– to prevent money laundering and terrorist financing</li> <li>– to track the flow of funds, if the address of a foreign person cannot be determined from their documents</li> </ul>
mother's name [AML Act, Sections 7-9]	to prevent money laundering and terrorist financing
type of the identity document [AML Act, Section 7; Regulation (EU) No. 2015/847, Article 4; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> <li>– to track the flow of funds, if the address of a foreign person cannot be determined from their documents</li> </ul>
letters of the alphanumeric code of the identity document [AML Act, Section 7; Regulation (EU) No. 2015/847, Article 4; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> <li>– to track the flow of funds, if the address of a foreign person cannot be determined from their documents</li> </ul>
number of the identity document [AML Act, Section 7; Regulation (EU) No. 2015/847, Article 4; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> <li>– to track the flow of funds, if the address of a foreign person cannot be determined from their documents</li> </ul>
type of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing
letters of the alphanumeric code of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing
number of the alphanumeric code of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing

source of funds [AML Act, Sections 10 and 19]	for the carrying out of due diligence required to prevent money laundering and terrorist financing
the nature and extent of ownership [AML Act, Section 9]	for the identification of the beneficial owner
a copy of the documents presented for verification of identity [AML Act, Section 7 (2), (3) and (8)]	for the prevention and combating money laundering and terrorist financing, the purpose of appropriate compliance with the obligations set out in the AML Act, the full execution of customer due diligence obligations and for the effective implementation of supervisory activities
phone number	in the case of payments made via the iCsekk application <ul style="list-style-type: none"> <li>– for the use of the mobile application</li> <li>– for payment</li> <li>– in the case of rejected items, to notify the payer</li> <li>– to identify individual payment/customer</li> <li>– as proof of payment</li> </ul>
authorisation code	in the case of payments made via the iCsekk application <ul style="list-style-type: none"> <li>– to identify the payment</li> <li>– as proof of payment</li> </ul>
transaction ID	In the case of payments made at bill payment terminals or via the iCsekk application <ul style="list-style-type: none"> <li>– to identify the payment</li> <li>– as proof of payment</li> </ul>
customer basket number	In the case of payments made at bill payment terminals <ul style="list-style-type: none"> <li>– to identify the payment</li> <li>– as proof of payment</li> </ul>
e-mail address	<ul style="list-style-type: none"> <li>– to communicate notifications regarding payment</li> <li>– in the case of rejected items, to notify the payer</li> </ul>
reference number	to identify the payment

### 3.2.2. Domestic postal money order ('pink cheque')

When using our domestic postal money order service ('pink cheque'), we may ask for the data below or link this information to the payments.

data	Why?
addressee's name, [Payment Dec., Section 53; Gov.	<ul style="list-style-type: none"> <li>– to make the payment</li> <li>– to identify the person authorised</li> </ul>

Dec., Section 4; Regulation (EU) 2015/847, Article 4]	– to track the flow of funds
addressee's address [Payment Dec., Section 53; Gov. Dec., Section 4]	– to make the payment – to identify the person authorised
name and birth name of the sender [Payment Act, Section 49; Regulation (EU) No. 2015/847, Article 4; AML Act, Sections 7-9 and Section 14 (3); MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	– to identify the payer – to track the flow of funds – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
address of sender [Payment Act, Section 49; Regulation (EU) No. 2015/847, Article 4; AML Act, Sections 7-9; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	– to identify the payer – to track the flow of funds – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
amount [Payment Act, Payment Dec.]	for payment
due date	the payer's information about the date of the outpayment in order to inform the addressee
date and time of payment [Payment Act, Section 10]	– as proof of payment, – to track payment
place of payment (name of PO)	– as proof of payment, – to track payment
phone number	to communicate notifications as a special service
e-mail address	to communicate notifications as a special service
signature [Gov. Dec., Section 22 (5)]	to prove receipt
witness's signature [Gov. Dec., Section 26(1)]	to prove delivery of money order addressed to persons who are illiterate, have no knowledge of Roman script, are blind or are unable to write for other reasons
citizenship [AML Act, Sections 7-9]	to prevent money laundering and terrorist financing
date and place of birth [AML Act, Sections 7-9 and 14 (3); Regulation (EU) 2015/847, Article 4]	– to prevent money laundering and terrorist financing – to track the flow of funds, if the address of a foreign person cannot be

	determined from their documents
mother's name [AML Act, Sections 7-9]	to prevent money laundering and terrorist financing
type of the identity document [AML Act, Section 7; Regulation (EU) No. 2015/847, Article 4; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prove the identity of the person receiving the item</li> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> <li>– to track the flow of funds, if the address of a foreign person cannot be determined from their documents</li> </ul>
letters of the alphanumeric code of the identity document [AML Act, Section 7; Regulation (EU) No. 2015/847, Article 4; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prove the identity of the person receiving the item</li> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> <li>– to track the flow of funds, if the address of a foreign person cannot be determined from their documents</li> </ul>
number of the identity document [AML Act, Section 7; Regulation (EU) No. 2015/847, Article 4; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prove the identity of the person receiving the item</li> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> <li>– to track the flow of funds, if the address of a foreign person cannot be determined from their documents</li> </ul>
type of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing
letters of the alphanumeric code of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing
number of the alphanumeric code of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing
source of funds [AML Act, Sections 10 and 19]	for the carrying out of due diligence required to prevent money laundering and terrorist financing
the nature and extent of ownership [AML Act, Section 9]	for the identification of the beneficial owner
a copy of the documents presented for verification of identity [AML Act, Section 7 (2), (3) and (8)]	for the prevention and combating money laundering and terrorist financing, the purpose of appropriate compliance with the obligations set out in the AML Act, the full

	execution of customer due diligence obligations and for the effective implementation of supervisory activities	
codes for reasons for returning mail [Gov. Dec., Section 25]	to inform the payer	
legible name	to prove receipt	
in the case of an authorised representative: 'mh' mark [Gov. Dec., Section 22 (5)]	to record the recipient's entitlement to receive	
for an alternative recipient, data concerning the relationship between the addressee and the recipient [Gov. Dec., Section 22 (5)]	to record the recipient's entitlement to receive	
spouse, lineal relative; adoptive, step or foster child; adoptive, step or foster parent; a brother or sister; domestic partner;	to record the recipient's entitlement to receive	
	the landlord of the property at the address or the person providing accommodation to the addressee provided they are natural persons: 'landlord', 'host'	to record the recipient's entitlement to receive
	indicating capacity as an adult witness: 'witness' [Gov. Dec., Section 26 (1)]	to record the recipient's entitlement to receive



### 3.2.3. Outpayment order

When providing the outpayment order service, we process the following data:

data	Why?
name and address of the addressee [Payment Dec., Section 52; Gov. Dec., Section 4]	<ul style="list-style-type: none"> <li>– to provide the service</li> <li>– to identify the person authorised</li> </ul>
name and address of the sender [Payment Dec., Section 52; Gov. Dec., Section 7]	<ul style="list-style-type: none"> <li>– to identify the payer</li> <li>– for the posting list acting as an accounting document</li> </ul>
reason for return [Gov. Dec., Section 25]	to inform the payer
grounds for payment (notes)	to communicate information considered important by the payer to the addressee (does not have to be given)
identifier of the addressee	not obligatory; its purpose is to communicate information to the addressee (e.g. reference number, contract number, etc.)
amount [Payment Act, Payment Dec.]	for the fulfilment of payment
date and time of payment [Payment Act, Section 10]	<ul style="list-style-type: none"> <li>– as proof of payment,</li> <li>– to track payment</li> </ul>
payer's bank account number	<ul style="list-style-type: none"> <li>– to identify the financial service provider and the payer</li> <li>– if the order is non-deliverable, the amount will be returned to the sender</li> </ul>
bank account number of the addressee	if the addressee requests payment to be made to a bank account
signature [Gov. Dec., Section 22 (5)]	proof of the availability of the funds for payment and proof of receipt of the money
witness's signature [Gov. Dec., Section 26(1)]	to prove delivery to persons who are illiterate, have no knowledge of Roman script, are blind or are unable to write for other reasons
type of identity document [Gov. Dec., Section 22 (5)]	to prove the identity of the person receiving the item
the letters of the alphanumeric code of the identity document [Gov. Dec., Section 22 (5)]	to prove the identity of the person receiving the item
number of the identity document [Gov. Dec., Section 22 (5)]	to prove the identity of the person receiving the item
in the case of an authorised representative: 'mh' mark [Gov. Dec., Section 22 (5)]	to record the recipient's entitlement to receive

for an alternative recipient, data concerning the relationship between the addressee and the recipient [Gov. Dec., Section 22 (5)]	to record the recipient's entitlement to receive
spouse, lineal relative; adoptive, step or foster child; adoptive, step or foster parent; a brother or sister; domestic partner;	to record the recipient's entitlement to receive
the landlord of the property at the address or the person providing accommodation to the addressee provided they are natural persons: 'landlord', 'host'	to record the recipient's entitlement to receive
indicating capacity as an adult witness: 'witness'	to record the recipient's entitlement to receive
collection date	<ul style="list-style-type: none"> <li>– the determination of the due date of the payment</li> <li>– authentic proof of collection</li> <li>– to track payment</li> </ul>
consigner's e-mail address (only in the case of an online outpayment order)	<p>Communication of notifications, which include:</p> <ul style="list-style-type: none"> <li>– sending of the reference number that is to be entered into the comment box of the fund transfer (the aggregation of the amount and the postage data)</li> <li>– in the case of refunding the amount to the sender</li> <li>– notification of collection or of the postal receipt data (ID number of the outpayment order)</li> <li>– in the case when 'Notification of Delivery' service is required</li> </ul>

### 3.2.4. Pension order

Magyar Posta Zrt. pays out pensions coming from the pension institution to those entitled in cash based on an agreement with the institution and using pension orders specifically for this purpose completed by the pension institution. Magyar Posta only processes personal data for the purpose of delivering the pension payments and in every other case (such as accepting requests for the pension payment due for the month of death) will act as the data processor of the pension institution.

Magyar Posta processes the following personal data in order to deliver pensions:

<b>data</b>	<b>Why?</b>
name and address of the addressee [Payment Dec., Section 52; Gov. Dec., Section 4]	to provide the service to identify the person authorised
reason for return [Gov. Dec., Section 25]	to inform the payer
grounds for payment (notes)	to communicate information considered important by the payer to the addressee (does not have to be given)
identifier of the addressee	not obligatory; its purpose is to communicate information to the addressee (e.g. reference number, contract number, etc.)
amount [Payment Act, Payment Dec.]	for the fulfilment of payment
due date	payer's notification to the addressee as to which month's pension is being paid out
bank account number of the addressee	to provide the service if the addressee requests payment to be made to this bank account
code number	<ul style="list-style-type: none"> <li>– for detailed settlement towards the payer</li> <li>– for identification of a transaction in the case of complaint handling</li> </ul>
signature [Gov. Dec., Section 22 (5)]	<ul style="list-style-type: none"> <li>– proof of the availability of the funds for payment and</li> <li>– proof of receipt of the money</li> </ul>
witness's signature [Gov. Dec., Section 26(1)]	to prove delivery to persons who are illiterate, have no knowledge of Roman script, are blind or are unable to write for other reasons
type of identity document [Gov. Dec., Section 22 (5)]	to prove the identity of the receiving person
the letters of the alphanumeric code of the identity document [Gov. Dec., Section 22 (5)]	to prove the identity of the receiving person
number of the identity document [Gov. Dec., Section 22 (5)]	to prove the identity of the receiving person
in the case of an authorised representative: 'mh' mark [Gov. Dec., Section 22 (5)]	to record the recipient's entitlement to receive
for an alternative recipient, data concerning the relationship between the addressee and the recipient [Gov. Dec., Section 22 (5)]	to record the recipient's entitlement to receive

spouse, lineal relative; adoptive, step or foster child; adoptive, step or foster parent; a brother or sister; domestic partner	to record the recipient's entitlement to receive
indicating capacity as an adult witness: 'witness'	to record the recipient's entitlement to receive

### 3.2.5. Cash withdrawal order

When providing the cash withdrawal order service, we process the following data:

data	Why?
account holder's name	to identify the person/company instructing payment
address	to identify the person/company instructing payment
phone/fax number	To contact the person/company instructing payment
bank account number:	to identify the person/company instructing payment
signature [Payment Dec., Section 51 (4)]	<ul style="list-style-type: none"> <li>– as proof of the account holder's declaration related to payment</li> <li>– as proof of receipt of the amount</li> </ul>
amount [Payment Dec., Section 51 (3)]	specifying the amount payable
name of the natural person authorised to withdraw cash [Payment Dec., Section 51 (3)]	to identify the person entitled to withdraw the money
the number of the identity document of the natural person authorised to withdraw cash [Payment Dec., Section 51 (3)]	to identify the person entitled to withdraw the money
receipt number	for the individual identification of the receipt

### 3.2.6. Changing coins to other denominations, paying with coins

In the event that coins are changed to other denominations or payment is made in coins at Magyar Posta and the coins are not counted at the time but you undertake an obligation to pay any difference found through subsequent counting, the data below are processed in connection with this obligation. In other cases of changing money, personal data are only processed if the customer pays or hands over coins or banknotes that are suspected counterfeit, and a record must be made of this to identify the customer pursuant to MNB Act, Section 24; MNB Decree No. 11/2011 (6

September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2.

data	Why?
name [MNB Act, Section 24 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to identify the person changing coins or paying in coins if counting is only done in that person's absence</li> <li>– to identify the person handing over or paying with suspected counterfeit coins</li> </ul>
address [MNB Act, Section 24 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to identify the person changing coins or paying in coins if counting is only done in that person's absence</li> <li>– to identify the person handing over or paying with suspected counterfeit coins</li> </ul>
type of identity document [MNB Act, Section 24 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to identify the person changing coins or paying in coins if counting is only done in that person's absence</li> <li>– to identify the person handing over or paying with suspected counterfeit coins</li> </ul>
the letters of the alphanumeric code of the identity document [MNB Act, Section 24 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to identify the person changing coins or paying in coins if counting is only done in that person's absence</li> <li>– to identify the person handing over or paying with suspected counterfeit coins</li> </ul>
number of the identity document [MNB Act, Section 24 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to identify the person changing coins or paying in coins if counting is only done in that person's absence</li> <li>– to identify the person handing over or paying with suspected counterfeit coins</li> </ul>
signature	to confirm the undertaking

### 3.2.7. Postal Financial Data Service (for example, if the receipt of a yellow cheque providing proof of payment of a bill is lost)

At the data subject's request, Magyar Posta provides financial data if the payee, the sender or the person/company instructing payment has lost the document proving the transaction or payment. We process the data shown in the table below in order to protect your data and to give data only to the person initiating payment or the addressee.

data	Why?
Payer's name and address,	<ul style="list-style-type: none"> <li>– to identify the person asking for postal financial data,</li> <li>– to identify the payment,</li> <li>– to send the postal financial data</li> </ul>
the data in the 'Addressee' box (the addressee's name and address or	– to identify the person asking for postal financial data,

account number)	<ul style="list-style-type: none"> <li>– to identify the payment,</li> <li>– to send the postal financial data</li> </ul>
the size of the amount (actual or approximate sum (this is not required for international postal orders and international express orders)),	to identify the payment
the (likely) postal service outlet(s) where the payment was made (this is not required for international postal orders and international express orders)	to identify the payment
and the date/period (actual date, or period stating dates from/to) when the payment was made	to identify the payment
the payment account number to which payment was made	to identify the payment
for pension orders: pension identification number	to identify the payment

### 3.2.8. Postal Financial Information Service

Naturally, payers and those instructing payment may ask Magyar Posta for information related to payments not only if the document proving payment is lost. Such a case is a copy of the receipt requested at the time of payment which is issued by Magyar Posta based on the receipt proving payment. In this case, too, great emphasis is placed on identifying the person entitled to ask for information and the requested information as accurately as possible, thus the data below are required:

<b>data</b>	<b>Why?</b>
Payer's name and address (the payer's address is not required for pension orders)	<ul style="list-style-type: none"> <li>– to identify the person asking for postal financial information,</li> <li>– to identify the payment,</li> <li>– to send the postal financial information</li> </ul>
the data in the 'Addressee' box (the addressee's name and address or account number)	<ul style="list-style-type: none"> <li>– to identify the person asking for postal financial information,</li> <li>– to identify the payment,</li> <li>– to send the postal financial information</li> </ul>
amount	to identify the payment
the name(s) of the postal service outlet(s) where the payment was made (this is not required for international postal orders, international express orders and outpayment orders)	to identify the payment

the date of payment (date of acceptance)	to identify the payment
the payment account number to which payment was made	to identify the payment
the identification number of the document proving payment	to identify the payment
for pension orders: pension identification number	– to identify the person asking for postal financial information, – to identify the payment
payer's identification number (only for yellow and white cheques, if the data subject wishes to give it)	to identify the payment
e-mail address of the person asking for postal financial information	to communicate the information

### 3.3. For what purpose do we process data?

- to perform our postal financial services,  
Magyar Posta processes these data to remit the money to the intended recipient indicated by the payer or the person/company instructing payment. For example, for a yellow cheque the amount of the phone or water bill paid to the service provider and for a pink cheque the amount sent to the addressee.
- to handle complaints about the services and claims for compensation,
- to deal with service-related inquiries made to the postal financial information and data service (points 3.2.7 and 3.2.8),
- to fulfil accounting obligations,
- to prevent money laundering and terrorist financing,
- to fulfil obligations to protect against counterfeiting legal tender.  
In doing this, data are processed to send suspected counterfeit money to the Magyar Nemzeti Bank for inspection and, if the money is not counterfeit, to enable us to return its value to the payer or the owner of the money.

### 3.4. How long do we process the data?

As regards performing individual payment orders for postal financial services, Magyar Posta processes data from the time of instructing the payment until the expiry of the period for enforcing rights, in other words for 5 years, in view of the legal requirement stipulated in Act V of 2013 on the Civil Code.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

In order to ensure that the flow of funds can be traced, Magyar Posta must process data to identify the payer for 5 years from the time of initiating the payment. [Regulation (EU) No. 2015/847, Article 16 (1)]

In order to prevent money laundering and terrorist financing, Magyar Posta is obliged to process data for 8 years or for the period required in an official request by the Magyar Nemzeti Bank as the supervisory body, the authority functioning as the financial information unit, the investigating authority, the public prosecutor's office and the courts, but for no longer than 10 years. [AML Act, Sections 56 (2) and 58 (1)]

In order to fulfil its obligations related to protecting against counterfeiting legal tender, Magyar Posta is obliged to keep data for 8 weeks from the time of initiating the payment. [MNB Decree No. 11/2011 (6 September), Section 14 (4)]

Magyar Posta must keep the accounting documents created in the course of providing the service, e.g. the main section of the yellow or white cheque, for 8 years. [Accounting Act, Section 169 (2)] Magyar Posta digitally archives and keeps images of accounting documents and their data certified in electronic format (with an electronic signature and date and time stamp).

### **3.5. Do we use data processors?**

Essentially, Magyar Posta provides its financial services itself and does not involve data processors.

Magyar Posta does, however, involve data processors in certain payment solutions and to provide services in certain areas of Hungary.

For the payment of bills using the iCsekk application Magyar Posta Zrt's data processor is Díjbeszedő Informatikai Korlátolt Felelősségű Társaság (1117 Budapest, Budafoki út 107-109, Company registration number: 01 09 173831 Tax number: 24370510-2-43), which operates the application and transfers the data of paid postal payment orders and postal bill payment orders made through the application to Magyar Posta's accounting systems.

Magyar Posta provides its services with the aid of postal contractors at many points in Hungary. Postal contractors are undertakings that are contracted by Magyar Posta to provide services for customers in the name of, for and at the liability of Magyar Posta applying the rules laid down by Magyar Posta. The postal contractors are accordingly the data processors of Magyar Posta Zrt. If you would like to view the list of postal contractors, you can access it on the [www.posta.hu](http://www.posta.hu) page under the Privacy Notice menu point.



### **3.6. Who may access the data?**

Magyar Posta processes personal data allowing access only to those who need them to carry out the service you require. Thus post office clerks accepting payment orders (e.g. cheques), personnel processing these at the Postal Accounting Centre, staff making outpayments as well as those involved in checking the performance of the service, accounting and examining complaints have access to these data. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

The basic characteristic of the yellow and white cheque bill payment service is that the data subject pays cash into a bank account (payment account). Thus it is an indispensable precondition of the service that Magyar Posta transfers the data of the private individual to the bank keeping the account of the addressee in the case of yellow cheques, and directly to the addressee in the case of white cheques so that the payment can be credited to the addressee's account and the addressee can identify who made the payment. Furthermore, if the amount on a pink cheque or an outpayment order is requested to be paid to the addressee's bank account, the data of the payer must also be transferred to the bank.

If any information, fact or circumstance connecting the data subject with money laundering or financing terrorism arises, Magyar Posta is obliged to report this to the authority functioning as the financial information unit, i.e. the Anti-money Laundering and Terrorist Financing Office of the Central Office of the National Tax and Customs Administration (Address: 1033 Budapest, Huszti út 42 Postal Box: 1300 Budapest, P.O. Box: 307.) [AML Act, Section 31] Magyar Posta is also obliged to send such data upon request to the Magyar Nemzeti Bank or the investigating authority, the public prosecutor or the court. Therefore these entities may also access the data. [AML Act, Section 58 (1)]

If suspicion arises that the money which the data subject pays with is counterfeit, Magyar Posta must record the data of the data subject in a report and send it to Magyar Nemzeti Bank's National Counterfeit Centre of the Cash Logistics Directorate (Address: 1054 Budapest, Szabadság tér 9.).

Magyar Posta Zrt's activity is supervised by the Magyar Nemzeti Bank [Address: 1054 Budapest, Szabadság tér 9. E-mail: [ugyfelszolgalat@mnbn.hu](mailto:ugyfelszolgalat@mnbn.hu)] and Magyar Posta Zrt is obliged to supply data to the MNB if so required [MNB Act, Section 48 (4)] Furthermore, the Magyar Nemzeti Bank settles disputed matters out of court via the Financial Arbitration Board [Address: 1013 Budapest, Krisztina krt. 39. Correspondence address: H-1525 Budapest P.O. Box.:172. Phone: +36-40-203-776 E-mail: [ugyfelszolgalat@mnbn.hu](mailto:ugyfelszolgalat@mnbn.hu)], so in the event of proceedings before the Financial

Arbitration Board the data may also be accessed by the Board (MNB Act, Section 108).

#### **4. Magyar Posta, as the international postal money order and international express order service provider**

##### **4.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

Magyar Posta Zrt processes data in connection with the international postal money order and international express order services, i.e. money sent from Hungary to an addressee abroad or sent from abroad to an addressee in Hungary, on the following basis:

- the processing of the sender's personal data is necessary for the conclusion and performance of the international postal money order and international express order service contract, which is concluded between the sender and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)]
- while the processing of the personal data of addressees and recipients is necessary for the validation of the legitimate interest of the sender and Magyar Posta Zrt, which is demonstrated by the fact that without it, the performance and certification of the contract would not be possible [General Data Protection Regulation, Article 6 (1) f)]
- the processing of personal data for the handling of customer claims relating to services is necessary for the validation of the legitimate interest if Magyar Posta Zrt, which is demonstrated by the fact that without the processing of the data the customer claims could not be investigated, answers could not be sent to the data subject and it would be impossible to process the indications of data subjects, which would undermine the legitimate economic interests of Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) f)]
- in relation to complaints, statements to be recorded as complaints and compensation claims the legal obligation for data processing is provided by Sections 17/A-17/C of Act CLV of 1997 on Consumer Protection [General Data Protection Regulation, Article 6 (1) c)]

It is also an essential feature of the service, that the personal data must be transferred to the addressee country. Data transfer

- in the case of the personal data of the sender, is necessary for the performance of the contract between the data subject and the data controlling Magyar Posta Zrt, or for the implementation of pre-contractual measures taken at the data subject's request [Article 49 (1) b) of the General Data Protection Regulation]
- while in the case of the recipients personal data it is necessary for the conclusion and fulfilment of the contract serving the recipient's interest,

concluded between Magyar Posta Zrt as data controller and the sender [General Data Protection Regulation, Article 49 (1) c)]

The Universal Postal Union was established out of public interest due to international postal traffic and the need to operate the universal postal service, the rules and regulations of which govern the processing of data concerning international transactions. Therefore transferring personal data accordingly is necessary for important reasons of public interest [General Data Protection Regulation, Article 49 (1) d)]

- Legislative Decree No. 26 of 1967 on the enactment of the Constitution of the Universal Postal Union signed at Vienna on 10 July 1964 and the Additional Protocols to the Constitution; Act CXIII of 2012 on the Enactment of the Seventh and Eighth Additional Protocols to the Constitution of the Universal Postal Union, the Universal Postal Convention of the Universal Postal Union consolidated with the amendments signed at the 2004 Bucharest Congress and the 2008 Geneva Congress, the Final Protocol of the Universal Postal Convention signed at the 2004 Bucharest Congress and the 2008 Geneva Congress, and the Postal Payment Services Agreement consolidated with the amendments signed at the 2004 Bucharest Congress, and based on these the effective Postal Payment Services Agreement of the Universal Postal Union.

These regulations provide the unified framework based on which Magyar Posta can transfer money through its services to almost 30 countries worldwide.

- Regulation (EU) No. 2015/847 of the European Parliament and of the Council (20 May) 2015 on Information Accompanying Transfers of Funds and Repealing Regulation (EC) No. 1781/2006 (2015/847/EU r.)<sup>3</sup>, which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c)]

Strict rules govern service providers in the financial world, and thus Magyar Posta, in order to ensure that the flow of funds can be monitored. For this reason the European Union requires Magyar Posta to be able to trace the funds flowing through its services to the person placing the order with Magyar Posta to transfer the funds, and to transfer the data to the service provider receiving the funds from Magyar Posta. Magyar Posta must process the data and these must be provided to enable us to perform the service.

- Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: AML Act) and Act LII of 2017 on the Implementation of Financial and Asset Restraint Measures Imposed by the

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<sup>3</sup> for data recorded prior to 26 June 2017 Regulation (EU) No. 1781/2006 of the European Parliament and of the Council (15 November) on Information on the Payer Accompanying Transfers of Funds

European Union and the UN Security Council (hereinafter: RM Act), <sup>4</sup>which create a legal obligation for the processing of the data [General Data Protection Regulation, Article 6 (1) c]

In order to prevent money laundering and terrorist financing, Hungary, too, requires that the data which enable the transfer of funds to be traced be recorded so that persons laundering money and financing terrorism can be identified. Magyar Posta must record such data and in certain cases transmit them to the authorities. If it did not do this, it could not provide the service.

- Section 24 of Act CXXXIX of 2013 on the Magyar Nemzeti Bank (hereinafter: MNB Act), which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c]

Under the cited law, the following documents also include provisions related to data processing:

- Sections 14-16 and Annex 4 of MNB Decree No. 11/2011 (6 September) on the Processing and Distribution of Banknotes and on Technical Tasks Relating to the Protection of Banknotes Against Counterfeiting
- Sections 6-8 and Annex 2 of MNB Decree No. 12/2011 (6 September) on the Processing and Distribution of Coins and on Technical Tasks Relating to the Protection of Coins Against Counterfeiting

These rules are intended to detect counterfeiters and to enable Hungary's central bank, the Magyar Nemzeti Bank, to withdraw counterfeit money. However, identifying counterfeit money is a technical task, and it sometimes happens that money which appears counterfeit is real. In order to return the value of the money thus withdrawn and found after the Magyar Nemzeti Bank's technical examination not to be counterfeit to the rightful owner, the person intending to pay out the suspected counterfeit money needs to be recorded. Magyar Posta has to record these data and transmit them to the Magyar Nemzeti Bank.

- Act C of 2000 on Accounting (hereinafter: Accounting Act), which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c]

Magyar Posta must account for money received from customers accurately, thus it is obliged to keep documents and data proving this.

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<sup>4</sup> For data recorded prior to 1 January 2018, Act CXXXVI of 2007 on the Prevention and Combating of Money Laundering and Terrorist Financing

## 4.2. What type of data do we process?

data	Why?
Addressee's name and address	<ul style="list-style-type: none"> <li>– to identify the person authorised</li> <li>– to provide the service</li> </ul>
name of the sender [AML Act, Section 7 and Section 14 (3); MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to identify the payer</li> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> <li>– to provide the service</li> </ul>
address of the sender [AML Act, Section 7; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to identify the payer</li> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> <li>– to provide the service</li> </ul>
date and time of payment	to prove receipt
place and date of dispatch (sending country)	as proof of payment
amount	for payment
password	if the payer makes payment conditional on providing a password
signature	to prove receipt
citizenship [AML Act, Section 7]	to prevent money laundering and terrorist financing
date and place of birth [AML Act, Section 7 and 14 (3)]	to prevent money laundering and terrorist financing
mother's name [AML Act, Section 7]	to prevent money laundering and terrorist financing
type of the identity document [AML Act, Section 7; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prove the identity of the receiving person with delivery in person</li> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> </ul>
letters of the alphanumeric code of the identity document [AML Act, Section 7; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prove the identity of the receiving person with delivery in person</li> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> </ul>

number of the identity document [AML Act, Section 7; MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	<ul style="list-style-type: none"> <li>– to prove the identity of the receiving person with delivery in person</li> <li>– to prevent money laundering and terrorist financing</li> <li>– to identify the payer with suspected counterfeit banknotes or coins</li> </ul>
type of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing
letters of the alphanumerical code of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing
number of the alphanumerical code of the residence card [AML Act, Section 7]	to prevent money laundering and terrorist financing
legible name	to prove receipt
in the case of an authorised representative: 'mh' mark	to record the recipient's entitlement to receive
for addressees who are illiterate, have no knowledge of Roman script, are blind or are unable to write for other reasons, indicating an adult witness proving receipt in the capacity of 'witness'	to record the recipient's entitlement to receive
bank account number of the addressee	<ul style="list-style-type: none"> <li>– if the addressee requests payment to be made to a bank account</li> <li>– if the addressee requests transfer to a bank account</li> </ul>
name of the addressee's bank	<ul style="list-style-type: none"> <li>– for the performance of the service (if the addressee requests payment here)</li> <li>– for the performance of the service (if the addressee requests transfer here)</li> </ul>
identifier of the addressee's bank	
message (note)	for the performance of the service (if the sender sends a message to the addressee)
order ID	to identify the payment
reason for return	to inform the payer

#### 4.3. For what purpose do we process data?

- for fulfil an international postal order or our express order services,
- to handle complaints about the services and claims for compensation, and to fulfil service-related data and information requests,
- to fulfil accounting obligations,
- to prevent money laundering and terrorist financing,
- to fulfil obligations to protect against counterfeiting legal tender.

#### **4.4. How long do we process the data?**

As regards to performing individual payment orders when sending international postal order or express orders, in view of the legal requirement stipulated in Act V of 2013 on the Civil Code, Magyar Posta processes data from the time of instructing the payment until the expiry of the period for enforcing rights, in other words for 5 years.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

In order to ensure that the flow of funds can be traced, Magyar Posta must process data to identify the payer for 5 years from the time of initiating the payment. [Regulation (EU) No. 2015/847, Article 16 (1)]

In order to prevent money laundering and terrorist financing, Magyar Posta is obliged to process data for 8 years or for the period required in an official request by the Magyar Nemzeti Bank as the supervisory body, the authority functioning as the financial information unit, the investigating authority, the public prosecutor's office and the courts, but for no longer than 10 years. [AML Act, Sections 56 (2) and 58 (1)]

In order to fulfil its obligations related to protecting against counterfeiting legal tender, Magyar Posta is obliged to keep data for 8 weeks from the time of initiating the payment. [MNB Decree No. 11/2011 (6 September), Section 14 (4)]

Magyar Posta must keep the accounting documents created in the course of providing the service, e.g. the main section of the international postal order or the original copy of the international express order, for 8 years. [Accounting Act, Section 169 (2)]

#### **4.5. Do we use data processors?**

Magyar Posta provides its services with the aid of postal contractors at many points in Hungary. Postal contractors are persons and undertakings that are contracted by Magyar Posta to provide services for customers in the name of, for and at the liability of Magyar Posta applying the rules laid down by Magyar Posta. The postal contractors are accordingly the data processors of Magyar Posta Zrt. If you would like to view the list of postal contractors, you can access it on the [www.posta.hu](http://www.posta.hu) page under the Privacy Notice menu point.

#### **4.6. Who may access the data?**

Magyar Posta processes personal data allowing access only to those who need them to carry out the service you require. Thus post office clerks accepting the international postal order or express order, personnel processing these at the Postal Accounting Centre, staff making outpayments as well as those involved in checking

the performance of the service, accounting and examining complaints have access to these data. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

As the international postal order and express order can be sent to almost 30 countries, an essential requirement of providing the service is for the sending and outpaying partner organisations to settle accounts with each other, which occurs through Deutsche Postbank AG. (HRB 6793, Amtsgericht Bonn, tax identification number: DE 169 824 467 [www.postbank.de](http://www.postbank.de)) using accounts held at the Bank.

To transfer money to the addressee's country and to make payment to the addressee, the addressee's data must be transferred to the postal or bank service provider operating in the addressee's country.

If any information, fact or circumstance connecting the data subject with money laundering or financing terrorism arises, Magyar Posta is obliged to report this to the authority functioning as the financial information unit, i.e. the Anti-money Laundering and Terrorist Financing Informational Office of the Central Office of the National Tax and Customs Administration (Address: 1033 Budapest, Huszti út 42 Postal Box: 1300 Budapest, P.O. Box: 307.) [AML Act, Section 31] Magyar Posta is also obliged to send such data upon request to the Magyar Nemzeti Bank or the investigating authority, the public prosecutor or the court. Therefore these entities may also access the data. [AML Act, Section 58 (1)]

If suspicion arises that the money which the data subject pays with is counterfeit, Magyar Posta must record the data of the data subject in a report and send it to Magyar Nemzeti Bank's National Counterfeit Centre of the Cash Logistics Directorate (Address: 1054 Budapest, Szabadság tér 9.).

## **5. Newspaper subscription**

Under this service, customers may order and subscribe to newspapers and magazines (hereinafter referred to as 'newspapers') from Magyar Posta. Magyar Posta only processes the data of customers and subscribers if they place an order or subscribe with Magyar Posta for delivering newspapers to them.

### **5.1. On what basis is Magyar Posta entitled to process data?**

- the processing of the subscriber's personal data is necessary for the conclusion and performance of the newsletter subscription service contract,



which is concluded between the subscriber and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)]

- if a subscriber pays the subscription fee to a magazine for another person (for example as a present), then the processing of the personal data of the recipient of the subscribed magazine is necessary for the enforcement of the legitimate interests of the subscriber and Magyar Posta Zrt, which is demonstrated by the fact that without those Magyar Posta Zrt would not be able to deliver the subscribed magazine to the data subject [General Data Protection Regulation, Article 6 (1) f)]

and

- Act CVIII of 2001 on certain aspects of electronic commerce and information society services

Magyar Posta enables its customers to pay for their subscription to newspapers in the webshop on the MyPost interface. By subscribing, a contract is entered into by electronic means (online contract) between Magyar Posta Zrt. and the data subject. The frameworks of this are defined by law. For instance, orders must be confirmed and thus Magyar Posta is obliged to process e-mail addresses. (for more details on this topic see Chapter 12 entitled Webshop)

- Act C of 2000 on Accounting (hereinafter: Accounting Act), which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c)]

Magyar Posta must account for orders accurately, thus it is obliged to keep documents and data proving these.

## 5.2. What type of data do we process?

data	Why?
subscriber ID and addressee ID	to identify the customer in the subscription records system
name	identification of the customer
address	identification of the customer
name, number and product ID of the newspaper subscribed to	<ul style="list-style-type: none"> <li>– to send customers the specific newspapers they ordered</li> <li>– for determining the cost of subscription</li> </ul>
telephone number (not obligatory)	handling complaints related to subscription
e-mail address (not obligatory except if the subscriber has placed an order through the webshop; in this case it is indispensable due to the compulsory	<ul style="list-style-type: none"> <li>– handling complaints related to subscription</li> <li>– confirmation of subscription</li> <li>– sending notification about expiry of</li> </ul>

confirmation [E-Commerce Act, Section 6 (2)])	subscription
duration of subscription	necessary for determining the performance period of the service
cost of subscription	necessary for the collection of the subscription fee
subscription fee payment method	necessary for the collection of the subscription fee
bank account number (not obligatory)	to settle the subscription fee if bank transfer or direct debit is chosen as the means of payment
account holding bank (not obligatory)	to settle the subscription fee if bank transfer or direct debit is chosen as the means of payment
name for delivery (not obligatory if it is identical with the name)	to enable the delivery of the subscribed newspaper to the subscriber
address for delivery (not obligatory if it is identical with the address)	to enable the delivery of the subscribed newspaper to the subscriber

### **5.3. For what purpose do we process data?**

Magyar Posta uses the data to supply the service, that is to deliver the subscribed newspapers to the addressee. For this the person of the subscriber and the title of the subscribed newspaper are necessary and so we need to record these data to provide the service.

Part of performing the service is the collection, accounting and invoicing of the subscription fees; handling complaints, and confirming orders placed by electronic means, and thus the data are processed to this end for the reasons described in point 5.2.

### **5.4. How long do we process the data?**

Magyar Posta processes subscriber data in connection with performing the subscription contract until the last day of the second calendar year after the expiry of the subscription.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

Magyar Posta is obliged to account for the subscriptions, and therefore, in relation to accounting, the Company is required to keep subscription data for 8 years under the Accounting Act.

## **5.5. Do we use data processors?**

Magyar Posta Zrt. uses Posta Kézbesítő Kft. (address: 1087 Budapest, Baross tér 11/C Company registration number: 01 09 691785 Tax number: 12018853-2-42) as their data processor. Posta Kézbesítő Kft. delivers the newspapers to the subscribers and collects the subscription fees.

A current list of additional data processors used by Posta Kézbesítő Kft., and approved by Magyar Posta Zrt, is available on the [www.posta.hu](http://www.posta.hu) website under the Privacy Notice menu point.

In addition to using the services of Posta Kézbesítő Kft. for data processing, Magyar Posta provides its services with the aid of postal contractors in various locations in Hungary. Postal contractors are undertakings that are contracted by Magyar Posta to provide postal services for customers in the name of, for and at the liability of Magyar Posta applying the rules laid down by Magyar Posta. The postal contractors are accordingly the data processors of Magyar Posta Zrt. If you would like to view the list of postal contractors, you can access it on the [www.posta.hu](http://www.posta.hu) page under the Privacy Notice menu point.

Magyar Posta Zrt uses EPDB Nyomtatási Központ Zártkörűen Működő Részvénytársaság (1117 Budapest, Budafoki út 107-109, Company registration no.: 01 10 048079, Tax number: 24924243-2-43) for the production of account statements and other documents related to subscriptions.

## **5.6. Who may access the data?**

The data may be accessed by the employees of Magyar Posta and its data processor who deal with accepting, delivering and processing subscriptions, record them in the IT system supporting newspaper subscription records, deliver newspapers to addressees (newspaper delivery personnel) and inspect the performance of the service.

If a customer makes a complaint, the staff dealing with complaints will also access the customer's data.

There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

If the subscriber turns to Magyar Posta Zrt with a request that Magyar Posta Zrt is unable to fulfil without the assistance of the Publisher, then in these particular cases the subscriber's data is made available to the Publisher, taking into account the legitimate interests of the subscriber. [General Data Protection Regulation, Article 6 (1) f)]

The situation may arise when a Publisher no longer commissions Magyar Posta to deliver subscribed newspapers to addressees. In such circumstances Magyar Posta would not be able to forward those newspapers to subscribers. Thus to ensure that the subscribed newspaper continues to reach addressees smoothly, and neither the subscriber nor the addressee is adversely affected, Magyar Posta transfers the subscribers' data to the Publisher, if any of the below criteria are fulfilled:

- the subscriber has provided their details for the completion of subscription, and
- without transferring the data to the Publisher the service could not be performed, i.e. would not be possible, and
- the data will be processed for the same reason as they have been until they were transferred,

therefore the data transfer is proportionate to the protection of the data subjects' personal data. [General Data Protection Regulation, Article 6 (1) f)]

Magyar Posta informs data subjects of the data transfer in advance, allowing them sufficient time to express their objection to their data being transferred and to cancel their subscription contract.

## **6. Stamps and philatelic product orders**

One of Magyar Posta's traditional services is issuing and circulating postage stamps. Magyar Posta only processes the data of customers purchasing stamps and philatelic products if they have placed an order for or subscribed to stamps and other philatelic products through Magyar Posta. When a purchase is made at a post office for a specific stamp available there, customer data are not recorded.

### **6.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

- the processing of the subscriber/customer's personal data is necessary for the conclusion and performance of the stamp order, as a service contract, which is concluded between the subscriber and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)]

and

- Act CVIII of 2001 on certain aspects of electronic commerce and information society services

Magyar Posta enables its customers to order stamps in the webshop on the MyPost interface. By placing an order, a contract is entered into by electronic means (online contract) between Magyar Posta Zrt and the data subject. The frameworks of this are defined by law. For instance, orders must be confirmed and thus Magyar Posta is obliged to process e-mail addresses.

- Act C of 2000 on Accounting (hereinafter: Accounting Act), which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c)]

Magyar Posta must account for orders accurately, thus it is obliged to keep documents and data proving these.

## 6.2. What type of data do we process?

<b>data</b>	<b>Why?</b>
name of the subscriber/customer	to identify the customer
address:	to identify the customer to post the order
telephone/fax number	to consult about the order and to deliver the order
e-mail address	to consult about the order and for confirmation
bank card type	to debit the fee for the order
bank card expiry date	to debit the fee for the order
bank card number	to debit the fee for the order
card holder's name	to debit the fee for the order
bank account number	to debit the fee for the order
signature	as proof of the order
photo uploaded and sent by the customer	necessary for printing on the stamp within the framework of personal stamp service
partner code	to identify the customer
product ID	to record and bill the order
product name	to record and bill the order
the consideration payable for the product or service used	to record and bill the order
product quantity	to determine the cost of the order

## 6.3. For what purpose do we process data?

Magyar Posta uses the data to perform the order, that is to deliver the ordered stamps to the customer. For this the person of the subscriber and the delivery address for the ordered stamps are necessary and so we need to record these data to provide the service.

Part of performing the service is the collection, accounting and invoicing of the fees for ordering; handling complaints, and confirming orders placed by electronic means; thus the data are processed to this end for the reasons described in point 6.2.

If the data subject wishes to place a Your Own Stamp order, a photo uploaded or sent by the customer is required for Magyar Posta to print on the stamp.

#### **6.4. How long do we process the data?**

Magyar Posta Zrt processes customer data for five (5) years after the placement of an order or, in the case of subscriptions, after the expiry of the subscription, because within this period the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt and the data subject in court.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

Magyar Posta must account for orders, thus it is obliged to keep documents related to placing the order for 8 years as stipulated in the Accounting Act.

#### **6.5. Do we use data processors?**

Magyar Posta Zrt does not use data processors.

#### **6.6. Who may access the data?**

The data may be accessed by the employees of Magyar Posta who deal with the accepting of orders, recording of orders (philately sales staff), accounting (accounting staff), producing of personalised stamps, packaging and addressing of compiled stamp packages (stamp storage staff), take part in delivering the stamps to the addressees (mail processing and delivery personnel) and the inspection of the performance of the service.

If a customer makes a complaint, the staff dealing with complaints will also have access to the customer's data.

There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

## 7. Telegram service

### 7.1. On what legal basis is Magyar Posta Zrt entitled to process data?

Magyar Posta is entitled to process data in the course of its activity of sending and delivering telegrams on the following basis:

- the processing of personal data is necessary for the performance of a public interest task, since Magyar Posta Zrt, as a universal postal service provider, was obliged by the legislator to provide a telegram service pursuant to Section 125 of Act C of 2003 on Electronic Communications. [General Data Protection Regulation, Article 6 (1) e]  
Section 125 of Act C of 2003 on Electronic Communications stipulates that Magyar Posta Zrt must provide the telegram service and that the use of telegraph services should be accessible to all.

Under the cited law, the following documents also include provisions related to data processing:

- Government Decree No. 236/2004 (13 August) on the Detailed Rules of Providing the Telegram Service (hereinafter: Telegram Dec.)

The Telegram Dec. lays down the detailed rules and conditions based on which Magyar Posta Zrt forwards telegrams to the addressee and the data that need to be provided when sending a telegram.

### 7.2. What type of data do we process?

<b>data</b>	<b>Why?</b>
name of the sender and addressee [Telegram Dec., Sections 5 (2) and 10 (2)]	to deliver the telegram
address of the sender and addressee [Telegram Dec., Sections 5 (2) and 10 (2)]	to deliver the telegram
text of the telegram	to deliver the telegram
picture	if the sender requests an image or photo to be attached to the telegram
phone number, fax number [Telegram Dec., Section 15]	to deliver the telegram if the sender requests delivery over the phone or by fax
signature of the sender [Telegram Dec., Sections 5 and 10]	– as part of the text of the telegram, – to prove using the service
recipient's signature	to prove receipt
date and time of receipt [Telegram Dec., Section 5 (3)]	to prove receipt
number of identification document	to prove the identify of the person

[pursuant to Postal Services Act, Section. 41 (10) and Telegram Dec., Section 14 (2)]	receiving with delivery in person
type of identification document [pursuant to Postal Services Act, Section. 41 (10) and Telegram Dec., Section 14 (2)]	to prove the identify of the person receiving with delivery in person
signature of the witness [pursuant to Gov. Dec., Section 26 (1) and Telegram Dec., Section 14 (2)]	to prove the delivery of a telegram addressed to persons who are illiterate, have no knowledge of Roman script, are blind or are unable to write for other reasons
reason for non-delivery [Telegram Dec., Section 14 (5)]	information for the sender
ground for receipt [pursuant to Telegram Dec., Section 14 (2)]	to record the recipient's entitlement to receive
in the case of an authorised representative: 'mh' mark	to record the recipient's entitlement to receive
for an alternative recipient, data concerning the relationship between the addressee and the recipient	to record the recipient's entitlement to receive
spouse, lineal relative, adoptive, step or foster child, adoptive, step or foster parent, a brother or sister; domestic partner; the spouse of a lineal relative, the lineal relative and brother or sister of the spouse, or the spouse of a brother or sister; [pursuant to Gov. Dec., Section 16 (3) a) and Telegram Dec., Section 14 (2)]	to record the recipient's entitlement to receive
the landlord of the property at the address or the person providing accommodation to the addressee provided they are natural persons [pursuant to Gov. Dec., Section 16 (3) b) and Telegram Dec., Section 14 (2)]: 'landlord', 'host'	to record the recipient's entitlement to receive
indicating capacity as an adult witness: 'witness' [pursuant to Gov. Dec., Section 26 (1) and Telegram Dec., Section 14 (2)]	to record the recipient's entitlement to receive

### 7.3. For what purpose we process data?

- to fulfil the telegram service contract

We process data in order to deliver telegrams to their addressees in compliance with the rules that apply to us – set by the sender or the addressee, or defined by law.



- to account, prove and subsequently check performance
 

The data are required to prove to senders that their telegram was delivered in accordance with their instructions and to ensure that every step of the process was carried out correctly. At the same time, it is important to be able to investigate complaints and claims for compensation, which would not be possible without processing the data necessary to deliver the telegram.
- to be able to supply data upon request
  - The sender, addressee or a person authorised by them may request data about the telegram or may ask to see the telegram. The data service can only be provided by processing data. [Telegram Dec., Section 18 (2)]
  - The National Media and Infocommunications Authority supervises the Company, thus in many cases, including checking the performance of telegram contracts, we must allow the Authority to have access to data. [Telegram Dec., Section 18 (4)]
  - We also have an obligation under Section 18 (2) of the Telegram Dec. to transfer data upon request to organisations authorised to gather intelligence in secret and to obtain confidential data.

#### **7.4. How long do we process the data?**

Personal data are processed for 18 months after sending a telegram. [Telegram Dec., Section 18 (3)]

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

#### **7.5. Do we use data processors?**

Magyar Posta provides its services with the aid of postal contractors at many points in Hungary. Postal contractors are undertakings that are contracted by Magyar Posta to provide postal services for customers in the name of, for and at the liability of Magyar Posta applying the rules laid down by Magyar Posta. The postal contractors are accordingly the data processors of Magyar Posta Zrt. If you would like to view the list of postal contractors, you can access it on the [www.posta.hu](http://www.posta.hu) page under the Privacy Notice menu point.

#### **7.6. Who may access the data?**

Magyar Posta processes telegram data abiding by the rules of confidentiality. [Telegram Dec., Section 18 (1)]

Personal data may only be accessed by those who need them to carry out the service for the data subject. Thus staff involved in forwarding telegrams (post office clerks and delivery personnel) as well as those involved in checking the performance of the service, accounting and examining complaints have access to the data of telegrams. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

We are obliged to provide data or allow access to data to the National Media and Infocommunications Authority and to organisations authorised under specific laws to gather intelligence in secret and to acquire data secretly.

Magyar Posta only provides personal data to or allows access for these organisations if the precise purpose and data range is indicated and only does so to the extent that is absolutely necessary for the purpose of the request and is suitable to achieve the objective.

## **8. MyPost Loyalty Programme**

### **8.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

Magyar Posta is entitled to process data on the following basis:

- The application of the data subject for a MyPost Card is the statement referring to the conclusion of the contract between Magyar Posta Zrt and themselves, relating to the MyPost Loyalty Programme. As a result, a contract shall be concluded if approved by Magyar Posta Zrt. The processing of the data is necessary for the conclusion and fulfilment of the contract [General Data Protection Regulation, Article 6 (1) b)], within the framework of which
  - the data of the data subject is processed by Magyar Posta Zrt for the purpose of creating the personal card, providing the customer ID function of the MyPost Card, point collection and accounting forming part of the service, provision of discounts and the handling of customer needs and complaints relating to the service.
  - the Service Provider used by the data subject for the provision of the products and services included in the MyPost Loyalty Programme - and specified in the General Contracting Terms and Conditions of the MyPost Loyalty Programme - processes the identification and transaction data necessary for the purpose of customer identification and point collection and accounting, which Magyar Posta Zrt and the Service Provider share with each other.

- Magyar Posta Zrt processes the data subject's identification and contact data for the purpose of providing group accident insurance and transfers it to Magyar Posta Biztosító Zrt (Cg.01-10-044751; Registered office: 1022 Budapest, Bég utca 3-5).
  - the data subject has a separate option to provide voluntary consent on the application form and
    - simultaneously request that Magyar Posta Zrt inform them of its offers and promotions along with those of their contracting partners, and
    - for this, authorise Magyar Posta Zrt to analyse their purchasing habits (profiling)
- [General Data Protection Regulation, Article 6 (1) a) and Act XLVIII of 2008 on the Basic Requirements of and Certain Restrictions on Commercial Advertising Activity, Section 6 (1)]

## 8.2. What type of data do we process?

Magyar Posta processes the following personal data within the framework of the MyPost Loyalty Programme:

data	Why?
name	<ul style="list-style-type: none"> <li>– identification of the customer</li> <li>– to issue a card in the individual's name</li> <li>– to identify the insured in the case of group accident insurance</li> <li>– to deliver information about the service, advertisements and offers</li> </ul>
place and date of birth	<ul style="list-style-type: none"> <li>– identification of the customer</li> <li>– to identify the insured in the case of group accident insurance</li> <li>– identifying target groups for advertising purposes and offers</li> </ul>
mother's name	<ul style="list-style-type: none"> <li>– identification of the customer</li> <li>– to identify the insured in the case of group accident insurance</li> </ul>
citizenship	<ul style="list-style-type: none"> <li>– identification of the customer</li> <li>– development of the services of Magyar Posta Zrt, analysis of its markets</li> </ul>
Gender	<ul style="list-style-type: none"> <li>– development of the services of Magyar Posta Zrt, analysis of its markets</li> <li>– identifying target groups for</li> </ul>

	advertising purposes and offers
address:	<ul style="list-style-type: none"> <li>– identification of the customer</li> <li>– delivery of the MyPost Card</li> <li>– to deliver information about the service, advertisements and offers</li> </ul>
postal address	<ul style="list-style-type: none"> <li>– delivery of the MyPost Card</li> <li>– to contact the insured in the case of group accident insurance</li> <li>– to deliver information about the service, advertisements and offers</li> </ul>
e-mail address	to deliver information about the service, advertisements and offers
phone number	to deliver information about the service, advertisements and offers
transaction data of purchased goods and used services (type of good or service, its price, total amount, date and time and location of use)	<ul style="list-style-type: none"> <li>– collecting, redeeming and accounting points</li> <li>– development of the services of Magyar Posta Zrt, analysis of its markets</li> <li>– identifying target groups for advertising purposes and offers</li> </ul>
level of education	<ul style="list-style-type: none"> <li>– development of the services of Magyar Posta Zrt, analysis of its markets</li> <li>– identifying target groups for advertising purposes and offers</li> </ul>
data relating to the composition of the household	<ul style="list-style-type: none"> <li>– development of the services of Magyar Posta Zrt, analysis of its markets</li> <li>– identifying target groups for advertising purposes and offers</li> </ul>
services intended to be used in the future, goals	<ul style="list-style-type: none"> <li>– development of the services of Magyar Posta Zrt, analysis of its markets</li> <li>– identifying target groups for advertising purposes and offers</li> </ul>
customer identification number	identification of the customer
signature of customer	to confirm use of service and consent
number of the MyPost Card	to identify the MyPost Card

### **8.3. For what purpose do we process data?**

- performance of the MyPost Loyalty Programme service
  - to issue a card in the individual's name,
  - customer identification,  
The My Post Card serves to identify the person using certain services available at the post office and on the Internet. If the data subject registers their MyPost Card in their online account (MyPost), the services for which Magyar Posta uses a higher level identification in order to protect data also become accessible. The data entered with the MyPost Card will be recorded in the data subject's account and they can be rectified or erased, except for the most important personal data which is verified by Magyar Posta Zrt during a face to face meeting
  - collecting and accounting points,
  - handling of customer needs and complaints relating to services,
- provision of group accident insurance included with the MyPost Card
- in the case of the separate consent of the data subject, not associated with the use of the MyPost Card, the data subject
  - is contacted by Magyar Posta Zrt with its own advertisements and offers as well as those of its contractual partners by e-mail, telephone, text message or post,
  - the analysis of the services used by the data subject enables Magyar Posta Zrt to develop its services and research its markets, and to use the results of this research to send its own advertisements and offers as well as those of its contractual partners and to define their target groups (profiling)

### **8.4. How long do we process the data?**

Magyar Posta Zrt processes the data subject's data used for the creation of their personal card, customer identification, collection and accounting points, the handling of customer needs and complaints relating to services for five (5) years following the termination of the MyPost Card contract, as within this period the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt and the data subject in court.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta Zrt processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

Data processed for the analysis of purchasing habits and in relation to advertisements and promotional offers is processed by Magyar Posta Zrt until the consent of the data subject is withdrawn, but at the latest for 2 years following the last activity on the card.

The data subject may at any time withdraw their consent, however such withdrawal shall not affect the lawfulness of data processing activities based on consent prior to the withdrawal.

### **8.5. Do we use data processors?**

During the provision of the MyPost Card service, Magyar Posta Zrt uses Magyar Posta Kártyaközpont Zártkörűen Működő Részvénytársaság (1133 Budapest, Váci út 110, Building B, Apartment 201, Company registration no: 01 10 047918, Tax number: 24748007-2-41) as a data processor, who uses Magyar Kártya Szolgáltató Zártkörűen Működő Részvénytársaság (1082 Budapest, Üllői út 48., Company registration no: 01 10 047947, Tax number: 24778839-2-42) as an additional data processor, to provide the required technical background. The additional data processor of Magyar Kártya Zrt. is Díjbeszedő Informatikai Korlátolt Felelősségű Társaság (address: 1117 Budapest, Budafoki út 107-109, Company registration number: 01 09 173831 Tax number: 24370510-2-43), which operates the system recording point collection and accounting.

For the operation of the interface, during the online application for the MyPost Card and the registration of the MyPost Card on the MyPost interface, Magyar Posta Zrt uses

- Dorsum Informatikai Fejlesztő és Szolgáltató Zrt (Company registration no.: 01-10-044594; Tax number: 12657496-2-41; Registered office: 1012 Budapest, Logodi utca 5-7, Floor 3 Apartment 18; [www.dorsum.eu](http://www.dorsum.eu)) to operate the application's online interface,
- Microsoft Ireland Operations Limited (Customer Care Centre, Atrium Building Block B, Carmanhall Road, Sandyford Industrial Estate, Dublin 18, Ireland) to provide Azure services, which provide the necessary servers and storage space for the operation of the application, as data processors.

During the use of the data processors Magyar Posta Zrt does not transfer data to countries outside of EEA Member States (European Union Member States and Norway, Lichtenstein and Iceland). If for any reason the data is required to be forwarded to data processors in countries outside of EEA Member States (European Union Member States and Norway, Lichtenstein and Iceland), Microsoft Ireland Operation Limited shall adhere to the contractual terms and conditions published in the annex of European Commission Decision no. 2010/87/EU (5 February 2010) on Standard Contractual Clauses for the Transfer of Personal Data to Processors Established in Third Countries under Directive no. 95/46/EC of the European Parliament and of the Council.

Magyar Posta Zrt uses the EPDB Nyomtatási Központ Zártkörűen Működő Részvénytársaság (1117 Budapest, Budafoki út 107-109, Company registration no: 01 10 048079, Tax number: 24924243-2-43) for data processing purposes in relation to the letter, e-mail, telephone or text message notification of the promotions and

advertisements of Magyar Posta Zrt and their contracting partners, by making use of its printing and e-mailing services as well as the e-mailing services of Magyar Posta Zrt's current creative agency. The data of the current creative agency of Magyar Posta Zrt can be found on the [www.posta.h](http://www.posta.h) website under the Privacy Notice menu point.

Magyar Posta Zrt employs Microsegment Consulting Partners Zrt-t (2234 Maglód Rudolf utca 11, Company registration no.: 13-10-040952) as a data processor, to analyse the services used by the data subject and the personal characteristics and preferences provided by the data subject, through which it classifies the customers into customer groups by processing these data.

### **8.6. Who may access the data?**

Magyar Posta processes personal data allowing access only to those who need them to carry out the service you require. Thus post office clerks registering your request to receive a MyPost Card, personnel processing the request at the Postal Accounting Centre, staff responsible for market research and defining target groups for advertisements and offers, as well as those involved in checking the performance of the service, accounting and examining complaints have access to these data. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

In view of the fact that Magyar Posta Zrt provides group accident insurance to all MyPost Card holders, the data are also accessible to Magyar Posta Biztosító Zrt's (Company registration number: 01-10-044751; Registered office: 1022 Budapest, Bég utca 3-5; Correspondence address: Posta Biztosító 1535, Budapest, P.O. Box 952, <https://www.postabiztosito.hu/>, [info@mpb.hu](mailto:info@mpb.hu)) staff handling group accident insurance; Magyar Posta Zrt transmits the data of the insured person to Magyar Posta Biztosító Zrt for the purpose of identification, and Magyar Posta Biztosító Zrt processes these data while the group accident insurance is valid.

## **9. Postal customs clearance service**

Magyar Posta Zrt processes the data of the addressee as a postal service provider, within the framework of which it notifies the addressee upon the receipt of a mail item subject to customs procedure. Then, in the customs clearance order, the addressee provides whether they wish to carry out the customs clearance of the mail item themselves, or prefer it to be carried out by Magyar Posta Zrt or another customs agency.

### **9.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

Magyar Posta is entitled to process data on the following basis:

- the processing of the personal data of the individual issuing the customs clearance order is necessary for the conclusion and performance of the customs clearance order, as a contract, which is concluded between the payer and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)] pursuant to Article 18 and 19 of Regulation (EU) No. 952/2013 of the European Parliament and of the Council (9 October 2013) on the Laying Down of the Union Customs Code.

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Magyar Posta Zrt is entitled to process data also based on the following legal regulations:

- Regulation (EU) No. 952/2013 of the European Parliament and of the Council (9 October 2013) laying down the Union Customs Code
- Commission Delegated Regulation (EU) No. 2015/2446 (28 July 2015) supplementing Regulation (EU) No. 952/2013 of the European Parliament and of the Council as regards detailed rules concerning certain provisions of the Union Customs Code
- Commission Implementing Regulation (EU) No. 2015/2447 (24 November 2015) laying down detailed rules for implementing certain provisions of Regulation (EU) No. 952/2013 of the European Parliament and of the Council laying down the Union Customs Code
- Act CLII of 2017 on the Implementation of the EU Customs Law, which specify the obligations to be fulfilled by the customs agency, as well as the scope of the data necessary for the carrying out of the customs procedure.

## 9.2. What type of data do we process?

data	Why?
name	to identify the data subject
tax identification number	In relation to applications for EORI/VPID numbers (individual ID number used within the EU customs area for customs registration purposes)
address	for delivering mail items and notices required for the customs agency service
phone number	for sending notifications related to consignments involved in the customs agency service
e-mail address	for sending notifications related to consignments involved in the customs agency service
bank account number	for paying customs duty and application for an EORI/VPID number.
citizenship and the data of the document certifying it	for supporting and certifying customs duty exemption grounds when necessary
certification of student status	for supporting and certifying customs duty



	exemption grounds when necessary
data certifying the customs value	for establishing the customs value
data included in document copies required according to the practice of the National Tax and Customs Administration	for supporting and certifying customs duty exemption grounds when necessary
export customs form data	for supporting and certifying customs duty exemption grounds when necessary
data certifying resettlement at home/transfer of habitual residence to the Community	for supporting and certifying customs duty exemption grounds when necessary

The provision of personal data with regard to the fulfilment of the customs clearance order is mandatory for EU and Hungarian legislation, without which Magyar Posta Zrt cannot act on behalf of the data subject in the customs procedure.

### **9.3. For what purpose do we process data?**

- to conclude and fulfil the order necessary for the customs procedure with the data subject
- to proceed on behalf of the data subject before customs authorities in relation to their mail item
  - to establish contact with the data subject and
  - to send deliver information on the terms and conditions required for customs administration

### **9.4. How long do we process the data?**

Magyar Posta Zrt. shall process the data of the data subject for 10 years pursuant to Section 33 of Act CLII of 2017 on the Implementation of the EU Customs Law

### **9.5. Do we use data processors?**

Magyar Posta Zrt does not employ a data processor for processing data.

### **9.6. Who may access the data?**

Magyar Posta processes personal data allowing access only to those who need them to carry out the service required by the data subject. Their personal data may be accessed by the data recording employees, customs administration employees and operators of the application that manages the information system used for storing data as well as employees of the National Tax and Customs Administration conducting customs procedures, to the extent and for the purpose required for performing their tasks.

There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and

protection staff, data protection officer) have access to these data provided it is essential for carrying out their duties.

As it is the main feature of customs agency services that the customs agent proceeds towards the customs authority as the representative acting in the name and/or interest of the payer, the customs authority may have access to the data of the data subject pursuant to Article 18 of Regulation (EU) No. 952/2013 of the European Parliament and of the Council (9 October 2013) laying down the Union Customs Code. Consequently, Magyar Posta Zrt, as customs agent, transfers the data of the data subject to the National Tax and Customs Administration to the extent required for conducting the customs procedure.

## 10. P.O. Box rental and the register of mailbox renters

The P.O. Box rental service is a service of Magyar Posta Zrt, in which Magyar Posta Zrt provides a P.O. Box at postal locations, where mail items can be delivered and collected by the customer. The P.O. Box has its own address therefore mail can be directly addressed to it. Magyar Posta Zrt makes this easier by making the register of mailbox renters publicly available, where the mailbox renters can voluntarily register.

### 10.1. On what legal basis is Magyar Posta Zrt entitled to process data?

- The processing of the data subject's data concluding a mailbox rental agreement is necessary for the conclusion and performance of the mailbox rental agreement, which is concluded between the customer and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)]
- However, the mailbox renter does may decide independently if they wish to be included in the register of renters, as this is not mandatory. Magyar Posta Zrt publishes the data of the mailbox renter in the register of mailbox renters based on the voluntary consent of the data subjects [General Data Protection Regulation, Article 6 (1) a)].

### 10.2. What type of data do we process?

data	Why?
name	<ul style="list-style-type: none"> <li>– for customer identification</li> <li>– for listing in the register of mailbox renters</li> </ul>
place and date of birth	for customer identification
mother's name	for customer identification
address: invoicing address (if different)	<ul style="list-style-type: none"> <li>– to contact the customer</li> <li>– for invoicing of contract specified consideration</li> </ul>

	– for listing in the register of mailbox renters
type and number of identification document	to identify the customer authorised to accept delivery
number and postal code of the P.O. Box	– to identify the rented P.O. Box – listing mailbox renters in the register
customer identification number	identification of the customer for listing them in the register of mailbox renters

### **10.3. For what purpose we process data?**

- for the establishment of a P.O. Box rental agreement,  
A contract is created between Magyar Posta and the data subject for which the renter of the mailbox, as the contracted customer of Magyar Posta, must be specified.
- to define and amend the contents of the contract
- to monitor the performance of the contract  
Both the customer and Magyar Posta have obligations under the contract. The customer is obliged to pay the fee, and Magyar Posta is obliged to make available the rented P.O. Box.
- to bill the prices or fees charged under contract
- we process the data of the P.O. Box renters in the register of mailbox renters to make public their name, address, P.O. Box number and P.O. Box postal code, according to their consent and wishes, in the Register of Mailbox Renters, and we publish the data so that mail items of senders can be delivered to the rented mailbox of the data subject.

### **10.4. How long do we process the data?**

Magyar Posta Zrt processes the data relating to the fulfilment of the P.O. Box rental contract for five years following the cessation of the contract, because within this period the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt and the data subject in court.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

Magyar Posta must be able to account for the fees listed in the contracts, thus it is obliged to keep the contracts as accounting documents for 8 years as stipulated in the Accounting Act.

In the register of mailbox renters, Magyar Posta Zrt processed the data of the data subject until their consent is withdrawn, or, in the absence thereof, no later than the date on which the rental agreement for the P.O. Box expires.

The data subject may at any time withdraw their consent, however such withdrawal shall not affect the lawfulness of data processing activities based on consent prior to the withdrawal.

#### **10.5. Do we use data processors?**

Magyar Posta provides its P.O. Box rental services with the aid of postal contractors at many points in Hungary. Postal contractors are undertakings that are contracted by Magyar Posta to provide P.O. Box services for customers in the name of, for and at the liability of Magyar Posta applying the rules laid down by Magyar Posta. The postal contractors are accordingly the data processors of Magyar Posta Zrt. If you would like to view the list of postal contractors, you can access it on the [www.posta.hu](http://www.posta.hu) page under the Privacy Notice menu point.

#### **10.6. Who may access the data?**

Magyar Posta processes personal data allowing access only to those who need them to carry out the service you require. The data of the mailbox rental agreement can therefore be accessed by employees performing data registration, i.e. persons concluding mailbox rental agreements, product managers processing mailbox rental agreements, as well as application managers operating the information system used for the storage of data, employees involved in the forwarding of mail items (sorting and delivery personnel) and those involved in checking the performance and accounting of services and the investigation of complaints. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties. In addition, the personnel involved by Magyar Posta's subcontractors and postal contractors as data processors in carrying out the activity may also access data.

We are obliged to cooperate with the organisations authorised to prevent and investigate crime, and to gather intelligence in secret. [Postal Services Act, Section 38 and Government Decree No. 9/2005 (19 January)] Magyar Posta only provides personal data to or allows access for these organisations if the precise purpose and data range is indicated and only does so to the extent that is absolutely necessary for the purpose of the request and is suitable to achieve the objective.

Additionally, it is also a requirement of the register of mailbox renters that data of the individuals wishing to be registered on the list is made public and accessible by all,

when they search in the register of mailbox renters. Therefore anyone may access the data.

## 11. Holding of mail items

In relation to mail items deliverable within the framework of its postal service, Magyar Posta Zrt provides the option for the addressee to request their holding at the postal service location. For this the addressee or legal representative may submit an order to Magyar Posta Zrt.

### 11.1. On what legal basis is Magyar Posta Zrt entitled to process data?

- the processing of the personal data is necessary for the conclusion and performance of the order, as a contract, which is concluded between the subscriber/customer and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)]
- if a customer orders a product for an other person (for example as a present), then the processing of the personal data of the other person is necessary for the enforcement of the legitimate interests of the customer and Magyar Posta Zrt, which is demonstrated by the fact that without those Magyar Posta Zrt would not be able to deliver the order to the data subject [General Data Protection Regulation, Article 6 (1) f)]

### 11.2. What type of data do we process?

data	Why?
names of the contracting parties	<ul style="list-style-type: none"> <li>– identification of the contract signing customer</li> <li>– to create a contract</li> <li>– to fulfil orders</li> </ul> (without this the order cannot be completed)
names of addressees	<ul style="list-style-type: none"> <li>– to identify the customer</li> <li>– identification of the mail items relating to the order</li> </ul> (without this the order cannot be completed)
address of addressees	identification of the mail items relating to the order (without this the order cannot be completed)
verification of being a minor	determining the authorisation right in relation to orders concerning addressees who are minors
signature	verifying the order (without this the order cannot be completed)

place of acceptance	fulfilment of orders, specification of the delivery destination for the mail item after expiry
date of order	record of the order,
duration of order	– fulfilment of the order – record of the order (without this the order cannot be completed)
identification code of the order (issue number)	record of the order,
order total	record of the order,

### **11.3. For what purpose do we process data?**

- to create the contract to fulfil the order,  
A contract is created between Magyar Posta and the data subject as a result of the order and for this the person placing the order as the contracted customer of Magyar Posta must be specified.
- to define and amend the contents of the contract  
The data of the order placed define the content of the contract, whose mail items are to be kept and for what length of time.
- to monitor the performance of the contract  
Both the customer and Magyar Posta have obligations under the contract. The customer is obliged to pay the fee, and Magyar Posta is obliged to store the mail items according to the order.
- to bill the prices or fees charged under contract
- to enforce claims arising from orders

### **11.4. How long do we process the data?**

Magyar Posta Zrt stores the data for 1 year following the termination of the order.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

### **11.5. Do we use data processors?**

Magyar Posta does not use data processors.

### **11.6. Who may access the data?**

Access is granted to the data for the employees of Magyar Posta Zrt, who keep the records of orders and who sort and store mail items relating to orders. Personnel managing complaints related to orders as well as those checking the performance of

the service also have access to these data. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

## 12. Webshop

Magyar Posta provides certain services not only at post offices but also via an online interface. For this the Company set up its own webshop, which can be accessed on its website. To place orders from the webshop, you need to enter the MyPost interface.

### 12.1. On what legal basis is Magyar Posta Zrt entitled to process data?

- the processing of the personal data is necessary for the conclusion and performance of the order, as a contract, which is concluded between the customer and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)]

The customer may also place their order for the other persons residing in the same residence, including for the mail items received for a minor, as the representative authorised to act on behalf of the data subjects.

### 12.2. What type of data do we process?

data	Why?
name	<ul style="list-style-type: none"> <li>– identification of the customer</li> <li>– to create a contract</li> <li>– to deliver orders</li> <li>– to issue an invoice</li> </ul> without this the order cannot be completed
e-mail address [E-Commerce Act, Section 6 (2)]	without the sending of a reconfirmation, no order is created
phone number	to contact the customer
delivery address	<ul style="list-style-type: none"> <li>– to deliver orders</li> <li>– to create a contract</li> </ul> without this the order cannot be completed
billing address	to issue an invoice (mandatory)
date of order	to record and bill the order
duration of order	to record and bill the order
place of order	to record and bill the order
name and identifier of the ordered product(s)	to record and bill the order
order total	to record and bill the order
quantity of ordered goods	to determine the cost of the order
payment method	for the execution of further steps

	depending on the method of payment (e.g.: in the case of payment with a bank card, navigating to the payment page)
delivery method (home delivery or collection in person)	<ul style="list-style-type: none"> <li>– to determine the cost of the order</li> <li>– for the execution of further steps depending on the method of delivery</li> </ul>

### **12.3. For what purpose do we process data?**

- to create the contract to fulfil the order,  
A contract is created between Magyar Posta and the data subject as a result of the order and for this the person placing the order as the contracted customer of Magyar Posta must be specified.
- to define and amend the contents of the contract  
The data of the order placed define the content of the contract, and for whom and what Magyar Posta must perform.
- to monitor the performance of the contract  
Both the customer and Magyar Posta have obligations under the contract. The person placing the order is obliged to pay the price of the product, and Magyar Posta is obliged to supply (in certain cases prepare) the product.
- to bill the prices or fees charged under contract
- to enforce claims arising from orders

### **12.4. How long do we process the data?**

Magyar Posta Zrt processes customer data for five years after registration because within this period the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt and the data subject in court.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

Magyar Posta must account for orders, thus it is obliged to keep documents related to them for 8 years as stipulated in the Accounting Act.

### **12.5. Do we use data processors?**

Magyar Posta Zrt does not use data processors.

### **12.6. Who may access the data?**



Magyar Posta's personnel who are involved in recording and billing orders, and wrapping, addressing, dispatching and delivering the products ordered have access to the data. Personnel managing complaints related to orders as well as those checking the performance of the service also have access to these data. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

### **13. Processing of suspected counterfeit banknotes and coins**

Magyar Posta has a legal obligation to take possession of suspected counterfeit banknotes and coins, and to withdraw and send them to the Magyar Nemzeti Bank for technical examination together with the personal data of the payer or the owner of the money.

#### **13.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

- Section 24 of Act CXXXIX of 2013 on the Magyar Nemzeti Bank (hereinafter: MNB Act), which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c)]
- Under the cited law, the following documents also include provisions related to data processing:
  - Sections 14-16 and Annex 4 of MNB Decree No. 11/2011 (6 September) on the Processing and Distribution of Banknotes and on Technical Tasks Relating to the Protection of Banknotes Against Counterfeiting
  - Sections 6-8 and Annex 2 of MNB Decree No. 12/2011 (6 September) on the Processing and Distribution of Coins and on Technical Tasks Relating to the Protection of Coins Against Counterfeiting

These rules are intended to detect counterfeiters and to enable Hungary's central bank, the Magyar Nemzeti Bank, to withdraw counterfeit money. However, identifying counterfeit money is a technical task, and it sometimes happens that money which appears counterfeit is real. In order to return the value of the money thus withdrawn and found after the Magyar Nemzeti Bank's technical examination not to be counterfeit to the rightful owner, the person intending to pay out the suspected counterfeit money needs to be recorded. Magyar Posta has to record these data and transfer them to the Magyar Nemzeti Bank.

### 13.2. What type of data do we process?

<b>data</b>	<b>Why?</b>
name and surname of the payer or owner of the money	to identify the payer with suspected counterfeit banknotes or coins
payer's or owner's address	in order to return the value of the money thus withdrawn and found after the Magyar Nemzeti Bank's technical examination not to be counterfeit to the rightful owner
payer's or owner's signature	to identify the payer with suspected counterfeit banknotes or coins
type of the identity document [MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	to identify the payer with suspected counterfeit banknotes or coins
letters of the alphanumeric code of the identity document [MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	to identify the payer with suspected counterfeit banknotes or coins
number of the identity document [MNB Act, Section 24; MNB Decree No. 11/2011 (6 September), Sections 14-16 and Annex 4 and MNB Decree No. 12/2011 (6 September), Sections 6-8 and Annex 2]	to identify the payer with suspected counterfeit banknotes or coins

### 13.3. For what purpose do we process data?

The data are processed for the purpose of transferring the counterfeit money to the Magyar Nemzeti Bank for technical examination by the Bank.

If the money is not counterfeit, we process the data in order to return its value to the payer or the owner of the money.

### 13.4. How long do we process the data?

Magyar Posta must keep the data for 8 weeks from the date of payment. [MNB Decree No. 11/2011 (6 September), Section 14 (4)]

### 13.5. Do we use data processors?

Magyar Posta Zrt uses MPT Security Zrt (Company registration number: 01-10-048525; Registered office: 1152 Budapest, Telek utca 5) for a preliminary

examination of suspected counterfeit banknotes. Based on the preliminary examination, MPT Security Zrt delivers banknotes they also deem suspected counterfeit and the report on the preliminary examination to the Magyar Nemzeti Bank, and returns the report on banknotes shown to be real to Magyar Posta Zrt.

### **13.6. Who may access the data?**

Magyar Posta Zrt's staff who handle the inpayment or accept the suspected counterfeit banknotes or coins have access to the data. A report of the suspected counterfeit banknotes or coins is made by the staff at the time they are presented and the customer receives one copy. After this, personnel involved in checking the accounts have access to the data and they transfer the data to MPT Security Zrt. for preliminary examination through whose offices the data may be transmitted to the Magyar Nemzeti Bank. Thus the staff of MPT Security Zrt. involved in the preliminary examination have access to the data. If the technical examination shows that the money is not counterfeit, the staff checking the accounts send the money to the payee through a domestic postal order.

The data of the data subject noted in the report are accessed by the Magyar Nemzeti Bank's National Counterfeit Centre of the Cash Logistics Directorate (Address: 1054 Budapest, Szabadság tér 9), as this is where Magyar Posta must transfer the data.

There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

## **14. Data processing to prevent money laundering**

In order to prevent money laundering and terrorist financing, Hungary, too, requires that the data which enable the transfer of funds to be traced be recorded so that persons laundering money and financing terrorism can be identified. Magyar Posta must record such data and in certain cases transfer them to the authorities. If the data subject does not give the data, Magyar Posta must refuse to provide the service.

### **14.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

- Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: AML Act) and Act LII of 2017 on the Implementation of Financial and Asset Restraint Measures Imposed by the European Union and the UN Security Council (hereinafter: RM Act),<sup>5</sup> which create a legal obligation for the processing of the data [General Data Protection Regulation, Article 6 (1) c]

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<sup>5</sup> For data recorded prior to 1 January 2018, Act CXXXVI of 2007 on the Prevention and Combating of Money Laundering and Terrorist Financing

The AML Act defines the detailed rules of the measures and data records necessary in order to prevent money laundering and terrorist financing that Magyar Posta must abide by. These are required by both the National Tax and Customs Administration and the Magyar Nemzeti Bank as supervisory bodies, and are interpreted by them in model regulations and recommendations, expressing the general provisions of the law as specific requirements.

#### 14.2. What type of data do we process?

data	Why?
first name and surname [AML Act, Sections 7 (2) aa); 8-9; 14 (3) and 14 (4)]	<ul style="list-style-type: none"> <li>– for identification required to prevent money laundering and terrorist financing</li> <li>– for the recording of the data</li> <li>– for the identification of the beneficial owner</li> </ul>
first name and surname at birth [AML Act, Sections 7 (2) ab); 8-9]	<ul style="list-style-type: none"> <li>– for identification required to prevent money laundering and terrorist financing</li> <li>– for the identification of the beneficial owner</li> </ul>
address, otherwise place of residence [AML Act, Sections 7 (2) af); 8-9]	<ul style="list-style-type: none"> <li>– for identification required to prevent money laundering and terrorist financing</li> <li>– for the identification of the beneficial owner</li> </ul>
citizenship [AML Act, Sections 7 (2) ac); 8-9]	<ul style="list-style-type: none"> <li>– for identification required to prevent money laundering and terrorist financing</li> <li>– for the identification of the beneficial owner</li> </ul>
type of identity and address or place of residence verifying document (AML Act, Section 7 (2) ag)]	for identification required to prevent money laundering and terrorist financing
letters of the alphanumeric code of the identity and address or place of residence verifying document (AML Act, Section 7 (2) ag)]	for identification required to prevent money laundering and terrorist financing
number of the identity and address or place of residence verifying document (AML Act, Section 7 (2) ag)]	for identification required to prevent money laundering and terrorist financing
date and place of birth [AML Act, Sections 7 (2) ad); 8-9; 14 (3) and 14 (4)]	<ul style="list-style-type: none"> <li>– for identification required to prevent money laundering and terrorist financing</li> <li>– for the recording of the data</li> <li>– for the identification of the beneficial owner</li> </ul>

mother's name [AML Act, Section 7 (2) ae)]	for identification required to prevent money laundering and terrorist financing
politically exposed status [AML Act, Section 19] These are persons who are or who have been entrusted with prominent public functions within 1 year or have such family members or are close associates of such persons. A politically exposed person for example is the prime minister of Hungary.	for identification required to prevent money laundering and terrorist financing
type and subject of the order [AML Act, Sections 10 and 14]	for analysing payments required to prevent money laundering and terrorist financing
amount of the order [AML Act, Sections 10 and 14]	for analysing payments required to prevent money laundering and terrorist financing
duration of the order [AML Act, Section 10]	for analysing payments required to prevent money laundering and terrorist financing, and monitoring business relations
the piece of data, fact or circumstance indicating money laundering or terrorist financing [AML Act, Sections 6, 30 and 31]	to report the flow of funds and suspected persons to the Tax Authority in order to prevent money laundering or terrorist financing
source of funds [AML Act, Sections 10 and 19]	for the carrying out of due diligence required to prevent money laundering and terrorist financing
the nature and extent of ownership interest [AML Act, Section 9]	for the identification of the beneficial owner
a copy of the documents presented for verification of identity [AML Act, Section 7 (2), (3) and (8)]	for the prevention and combating money laundering and terrorist financing, the purpose of appropriate compliance with the obligations set out in the AML Act, the full execution of customer due diligence obligations and for the effective implementation of supervisory activities

### 14.3. For what purpose do we process data?

Magyar Posta processes data based on its legal obligation for the following purposes:

- to identify data subjects using financial services and the international postal order service

- in case of suspicion, file a report with the Anti-money Laundering and Terrorist Financing Office of the Central Office of the National Tax and Customs Administration
- in the cases specified by law, investigate interrelated transactions and payments
- to monitor the flow of funds in business relations with the data subject

#### **14.4. How long do we process the data?**

Magyar Posta Zrt is obliged to process the data for 8 years. [AML Act, Section 56]

Certain data may have to be kept by Magyar Posta for longer but a maximum of 10 years. This obligation arises if the Magyar Nemzeti Bank, the Anti-money Laundering and Terrorist Financing Office of the Central Office of the National Tax and Customs Administration, the investigating authority, the public prosecutor's office or the courts request Magyar Posta Zrt to retain the data for a specified period longer than 8 years, not exceeding the beforementioned 10 years.

#### **14.5. Do we use data processors?**

Magyar Posta does not use data processors for these data.

#### **14.6. Who may access the data?**

Magyar Posta requires strict authorisation for allowing access to such data. The data subject's data is accessible to the employee accepting the money or the sales representative concluding a contract when recording the transaction. In addition to this, staff responsible for analysis and data services required to prevent money laundering and terrorist financing and designated employees forwarding reports to the Anti-money Laundering and Terrorist Financing Office of the Central Office of the National Tax and Customs Administration have access to the data. Magyar Posta Zrt inspects every year the fulfilment of measures and tasks in order to prevent money laundering and terrorist financing. Thus the data of data subjects are also accessible to employees engaged in such controls (internal auditors, security and protection staff, data protection officer) inasmuch as this is essential to carry out the controls (for example, inspecting the proper completion of identification data sheets).

Magyar Posta Zrt is also obliged to transfer such data upon request to the Magyar Nemzeti Bank, the Anti-money Laundering and Terrorist Financing Office of the Central Office of the National Tax and Customs Administration (Address: 1033 Budapest, Huszti út 42, P.O. Box: 1300 Budapest, P.O. Box: 307) or the investigating authority, prosecutors office or the court. Therefore these entities may also access the data. [AML Act, Sections 31 and 58 (1)]

**14.7. Can the data subject receive information about any data, fact or circumstance arising in connection with him or her with regard to money laundering or terrorist financing?**

Magyar Posta may not disclose any information if the data subject requests information about a report made in the event of any piece of data, fact or circumstance arising with regard to money laundering or terrorist financing, or about the suspension of the transaction or whether criminal proceedings have been initiated against them. [AML Act, Section 54]

**15. Magyar Posta, as carrier**

One of Magyar Posta Zrt's basic activities is to deliver mail items to addressees, which it also performs as a carrier.

**15.1. On what basis is Magyar Posta entitled to process data?**

During its activities related to carriage, i.e. forwarding and delivering mail items to the addressee, Magyar Posta is entitled to process data on the following basis:

- the processing of the sender's personal data is necessary for the conclusion and performance of the transport contract, which is concluded between the sender and Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) b)]
- while the processing of the personal data of addressees and recipients is necessary for the validation of the legitimate interest of the sender and Magyar Posta Zrt, which is demonstrated by the fact that without it, the performance and certification of the contract would not be possible under the statutory terms and conditions for the fulfilment of transport contract [General Data Protection Regulation, Article 6 (1) f)]

in addition, the following also has jurisdiction over the transport contract:

- Sections 6:257 to 6:271 of Act V of 2013 on the Civil Code (hereinafter: Civil Code)

Magyar Posta Zrt, as the carrier, processes the sender's and the addressee's data as well as information required for handling the mail item during carriage on the document necessary for providing the service pursuant to the rules of the cited law.

**15.2. What type of data do we process?**

<b>data</b>	<b>Why?</b>
names of the sender and addressee [Civil Code, Sections 6:257 and 6:258]	for the delivery of the mail item

addresses of the sender and addressee [Civil Code, Sections 6:257 and 6:258]	for the delivery of the mail item
e-mail address [Civil Code, Sections 6:264 and 6:265]	to communicate notifications about the mail item
telephone number [Civil Code, Sections 6:264 and 6:265]	to communicate notifications about the mail item
signature of the sender [Civil Code, Section 6:258]	proof of dispatch on the consignment note
place and date of receipt of the mail item [Civil Code, Section 6:258]	<ul style="list-style-type: none"> <li>– proof of dispatch on the consignment note</li> <li>– proof of handover to the recipient</li> </ul>
recipient's signature	to prove receipt
legible name of recipient	to prove handover and the identity of the recipient
number of the recipient's identity document	to prove the identity of the receiving person
type of the recipient's identity document	to prove the identity of the receiving person
signature of witness	to prove delivery of mail addressed to persons who are illiterate, have no knowledge of Roman script, are blind or are unable to write for other reasons
reason for non-delivery [Section 6:264]	to inform the sender in order to obtain instructions
ground for receipt	to record the recipient's entitlement to taking the parcel
in the case of an authorised representative: 'mh' mark	to record the recipient's entitlement
for an alternative or occasional recipient, data concerning the relationship between the recipient and the addressee	to record the recipient's entitlement to taking the parcel
spouse, lineal relative; adoptive, step or foster child; adoptive, step or foster parent; a brother or sister; domestic partner; the spouse of a lineal relative; the lineal relative and brother or sister of the spouse, or the spouse of a brother or sister	to record the recipient's entitlement to receive
the landlord of the property at the address or the person providing accommodation to the addressee provided they are natural persons: 'landlord', 'host'	to record the recipient's entitlement to receive



	employee not authorised to represent an organisation, in the capacity of an occasional recipient, indicating this capacity: 'employee'	to record the recipient's entitlement to receive
	neighbour, in the capacity of an occasional recipient, indicating this capacity: 'neighbour'	to record the recipient's entitlement to receive
	indicating capacity as an adult witness: 'witness'	to record the recipient's entitlement to receive

### **15.3. For what purpose do we process data?**

We process data in order to deliver mail items to their addressees in compliance with the rules that apply to us – set by the sender and the addressee, and defined by law.

The data are required to prove to senders that their mail item was delivered in accordance with their instructions and to ensure that everything occurred correctly. At the same time, it is important to be able to investigate complaints and claims for compensation, which we could not do without processing the data necessary to deliver the mail items.

### **15.4. How long do we process the data?**

Magyar Posta Zrt processes personal data for five (5) years after fulfilling the carriage contract, i.e. handing over the mail item to the recipient, in view of the fact that within this period may the data subject enforce any legal dispute that may arise between Magyar Posta Zrt and the data subject in court.

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the service (e.g. court proceedings), Magyar Posta Zrt processes the data for the period necessary for the establishment, exercise or defence of such legal claims.

### **15.5. Do we use data processors?**

Magyar Posta uses subcontractors for its carriage activity, who take part in the forwarding and delivery of mail items to the addressees, and, to do this, process data that are essential for this. If you would like to view the list of used subcontractors, you can access it on the [www.posta.hu](http://www.posta.hu) page under the Privacy Notice menu point.

### **15.6. Who may access the data?**

Magyar Posta processes personal data allowing access only to those who need them to carry out the service you require. Thus staff involved in forwarding mail items (post office clerks, sorting and delivery personnel) as well as those involved in checking the performance of the service, accounting and examining complaints have access to the

data of mail items. There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties. In addition, the personnel involved by Magyar Posta's subcontractors as data processors in carrying out the activity may also access data.

**16. Processing video data**

Magyar Posta operates video cameras in its properties. Information on each camera is available on the location where each camera operates. Here only the general rules which govern the operation of Magyar Posta Zrt's cameras are summarised.

**16.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

- The personal data processed during camera surveillance operation is based on the legally and socially accepted legitimate interest of Magyar Posta Zrt, to protect the property of persons residing in buildings, Magyar Posta Zrt’s assets and the data and valuables processed by and entrusted to it, for which it is necessary for it to be able to observe events taking place in the building through image registering equipment. [General Data Protection Regulation, Article 6 (1) f)]

When using cameras, Magyar Posta Zrt acts in accordance with the provisions of Sections 30 to 31 of Act CXXXIII of 2005 on the Protection of Persons and Property and the Activities of Private Investigators (hereinafter: Property Act).

**16.2. What type of data do we process?**

data	Why?
image(s) of the data subject	to protect the data subject and the property brought into and present in buildings operated or used by Magyar Posta

**16.3. For what purpose we process data?**

Magyar Posta Zrt processes video footage in order to prevent crimes being committed and protect the life and property of people entering or working at the post office, their payment, bank, insurance and securities secrets, as well as Magyar Posta Zrt's property, and to ensure that any potential crime threatening the beforementioned can be detected.

**16.4. How long do we process the data?**

Magyar Posta Zrt abides by the deadlines of Section 31 of the aforementioned Property Act when processing video footage. As post offices also offer services related to stocks, financial services and insurance, video footage is retained for a maximum of 60 days. However, this does not mean that Magyar Posta Zrt is obliged to keep video footage for 60 days in every case. If a camera is operated at a place where no financial, investment or insurance service is available but money is handled, the footage is retained for a maximum of 30 days. In every other case the footage is kept for 3 working days, after which it is erased.

#### **16.5. Do we use data processors?**

Magyar Posta does not generally use data processors for operating cameras, but performs the operation itself. In certain priority postal facilities, live camera images are monitored by security guards (security officer) providing the reception service. Magyar Posta Zrt employs Pajzs 07 Biztonságvédelmi és Magánnyomozó Zártkörűen Működő Részvénytársaságtól (Company registration no.: 01-10-045764, Registered office: 1149 Budapest, Angol utca 77) and CIVIL Biztonsági Szolgálat Zártkörűen Működő Részvénytársaságtól (Company registration no.: 01-10-044642, Registered office: 1149 Budapest, Angol utca 77) for the provision of security guard services, regarding which Magyar Posta Zrt has displayed notifications in the guarded buildings.

#### **16.6. Who may access the data?**

Video footage is only accessed in justified cases by colleagues whose duties involve the protection of life and property.

The recorded images may be viewed/accessed by the court or authority authorized by law, as well as those, whose rights and legitimate interest are affected by the recording of images.

Those individuals whose right or legitimate interest is affected by the footage recorded by the cameras or any other recording of their personal data during the storing period of the data, may, with the verification of their right and legitimate interest, request Magyar Posta Zrt not to destroy or erase the footage. (non-destruction request)

Only if a court or other authority request is received shall Magyar Posta Zrt make the recording available to the requesting court or authority. If, within thirty days of receiving the non-destruction request of a court or another authority, no further request for the footage is received, Magyar Posta Zrt shall erase or destroy the recording, unless the storage deadline specified in this Notice has not yet expired.

### **17. Data processing related to entry**

Magyar Posta Zrt protects many of its buildings, its employees, assets kept in the buildings and data stored there by an entry system and reception service in order to prevent unauthorised entry.

**17.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

The personal data processed is based on the legally and socially accepted legitimate interest of Magyar Posta Zrt, to protect the lives and property of persons residing in buildings, Magyar Posta Zrt's assets and the data processed by it, for which it is necessary to be able to determine the identity and entry authorisation of persons entering the buildings. [pursuant to the General Data Protection Regulation, Article 6 (1) f)]

**17.2. What type of data do we process?**

data	Why?
name	identification of the individual authorised to enter and the verification of their right to enter
place of birth	identification of the individual authorised to enter and the verification of their right to enter
date of birth	identification of the individual authorised to enter and the verification of their right to enter
mother's name	identification of the individual authorised to enter and the verification of their right to enter
workplace/organisational unit	verification of their right to enter
purpose of entry	verification of their right to enter
license plate number	identification of the vehicle of the individual authorized to enter

Personal data will be collected directly from the data subject, unless the entry is necessary for work done in the name of the authorized person's respective employer in which case the personal data is transmitted by the employer.

**17.2.1. What can the doorman or the security officer request?**

Data subjects should be aware that employees and security officers working at the reception and in postal buildings are entitled to ask them when entering a building and while staying in a building:

- to identify themselves by presenting their documents and
- to explain the purpose of their stay in the building used by Magyar Posta Zrt.

- to show their bags and their delivery documents.

Furthermore, they may ask data subjects to show the contents of their bags, vehicle and consignment if it is likely that these contain an article that is prohibited from entering or leaving (probably originating from a crime or offence) and the data subject fails to hand them over when instructed and a measure needs to be taken to prevent or hinder an infringement of the law. For example, if suspicion arises that the data subject wishes to remove a stolen laptop or a mobile phone from the building in his or her bag, an employee working at the reception or the security guard may ask the data subject to open his or her bag to show the contents.

### **17.3. For what purpose do we process data?**

Magyar Posta processes data for the purpose of identifying the persons entering its buildings, checking whether or not they are authorised to enter the building and protecting the Company's property and the data processed by it.

### **17.4. How long do we process the data?**

Magyar Posta processes the data of persons entering on an occasional basis for 24 hours and the data of persons having a permanent right of entry until their authorisation expires but at most for 6 months.

### **17.5. Do we use data processors?**

Magyar Posta operates its electronic entry systems itself and does not use data processors for this. However, entry is recorded not only by electronic systems but also manually by reception services. In this case the security guards performing the reception service record the data and check authorisation to enter the building. Magyar Posta Zrt employs Pajzs 07 Biztonságvédelmi és Magánnyomozó Zártkörűen Működő Részvénytársaságtól (Company registration no.: 01-10-045764, Registered office: 1149 Budapest, Angol utca 77) and CIVIL Biztonsági Szolgálat Zártkörűen Működő Részvénytársaságtól (Company registration no.: 01-10-044642, Registered office: 1149 Budapest, Angol utca 77) for the provision of security guard services, regarding which Magyar Posta Zrt has displayed notifications in the guarded buildings.

### **17.6. Who may access the data?**

In the case of electronic entry systems, postal staff designated to operate the entry system have access to the data while with paper-based systems the security guards and postal personnel performing the reception service, the personnel authorized to issuing admittance documents (cards) as well as the designated contact person(s) defined/appointed in connection with the performance of a contract requiring entry may access the data.

Security guards and postal personnel performing the reception service may access data while checking bags, delivery documents, vehicles and consignments.

Magyar Posta Zrt's security staff check that entry procedures are followed correctly and inspect records related to entry, thus the personnel involved in this may have access to the data of data subjects insofar as this is essential to carry out their activities.

Magyar Posta Zrt does not transfer data, unless the transfer of data is specifically necessary due to fulfilment of data transfer requirements specified by law, for conducting a legal procedure on behalf of an authority or court.

## **18. Magyar Posta Zrt's data processing for direct marketing (advertising) purposes**

Magyar Posta processes several types of data for the purpose of forwarding advertising, offers and newsletters to data subjects and to expand the range of its customers, bearing in mind the needs of data subjects and the services they use at Magyar Posta. Data subjects may receive advertisements about Magyar Posta Zrt's products and services provided they explicitly consent to this, but Magyar Posta Zrt may also contact them with the offers of its contractual partners.

### **18.1. Which data processing activities are included and what is their purpose?**

<b>Data processing</b>	<b>The purpose of data processing</b>
Lifestyle database	<p>to send out promotions and advertisements of Magyar Posta Zrt or those of other entities assuming them for this purpose</p> <ul style="list-style-type: none"> <li>– to select the data subject from the addressee group of the specific promotion or advertisement pursuant to the answers indicated by the data subject and the conditions defined by Magyar Posta Zrt or the entity assuming them (profiling) and</li> <li>– based on this, to send promotions and advertisements to the data subject that are in line with their interests (tailor-made) via e-mail, telephone, text message or by post (direct business acquisition).</li> </ul> <p>Profiling is done by Magyar Posta Zrt or the entity assuming them, by determining who they wish to send advertising to (e.g.: individuals aged between 25 and 40). According to this criteria of the target group the identification codes of the files matching the criteria are retrieved. Following this, the name, address or e-mail address etc. of the individuals who match the criteria based on the identification data are added to the list. The list is then used for the sending out of advertising messages. The only consequence of this</p>

	for the data subject is that they receive a more tailor-made offer.
MyPost Card marketing	<p>Based on the consent given when requesting the MyPost Card service, the data subjects</p> <ul style="list-style-type: none"> <li>– are contacted by Magyar Posta with its own advertisements and offers as well as those of its contractual partners by e-mail, telephone, text message or post, or</li> <li>– have their purchasing habits analysed to enable Magyar Posta to develop its services and research its markets, and to use the results of this research to send its own advertisements and offers as well as those of its contractual partners and to define their target groups (profiling)</li> </ul> <p>Profiling is done by Magyar Posta Zrt or the entity assuming them, by determining who they wish to forward advertising to (e.g.: to individuals who plan to use home saving services). According to this criteria of the target group the identification codes of the files matching the criteria are retrieved. When the data subject next uses their MyPost Card, the postal employee serving them is notified by the system of the customer's needs, based on which the employee can give more personalised offers. The only consequence of this for the data subject is that they receive offers in line with their interests.</p>
MyPost marketing	To send customers registering for Magyar Posta Zrt's electronic services Magyar Posta Zrt's own advertisements and offers as well as those of its contractual partners by e-mail, telephone or post
Philatelic (stamp) marketing	<ul style="list-style-type: none"> <li>– to keep in contact with data subjects regarding philatelic (stamp) products</li> <li>– to send them offers, information about products and services, and advertisements by post, e-mail, telephone and other electronic channels (e.g. as a Facebook message or Instagram post)</li> </ul>
Sales assistance	<ul style="list-style-type: none"> <li>– for customers going to a post office to enquire in person, making an offer tailored to their needs, providing information about available products or services</li> <li>– for establishing contact with interested customers to discuss offers and arrange an appointment</li> </ul> <p>in person, in writing, over the phone or in an e-mail</p>
Advertisements sent to mailbox renters	for sending data subjects offers and information about products, services and advertisements by post or telephone

Magyar Posta Zrt informs data subjects of these types of data processing activities prior to them giving their consent. We shall provide Information about these types of

data processing activities in this section, in a single location and in a transparent manner.

## 18.2. On what legal basis is Magyar Posta Zrt entitled to process data?

For all types of data processing

- the voluntary consent of the data subjects [General Data Protection Regulation, Article 6. (1) a)]

Magyar Posta ensures that data subjects can make specific and explicit declarations about whether or not they wish Magyar Posta to send them advertisements, offers and newsletters and whether or not the Company may use the data they give for this.

When processing data, Magyar Posta considers the provisions of

- Act CVIII of 2001 on Certain Aspects of Electronic Commerce and Information Society Services, Section 13/A,
- Act XLVIII of 2008 on the Basic Requirements of and Certain Restrictions on Commercial Advertising Activity, Section 6,
- and Act CXIX of 1995 on the Use of Name and Address Information for the Purposes of Research and Direct Marketing.

## 18.3. The type of data we process

Data processing	Data
Lifestyle database	name
	postal address
	date of birth
	land line telephone number
	mobile phone number
	e-mail address
	number of the MyPost Card
	Gender
	Family status
	Total number of people living in household
	Year of birth and sex of children under the age of 14 living in household
	Highest education
	Highest education of spouse/partner
	Occupation
	Occupation of spouse/partner
	What field do they work in?
Who owns your home?	



	Type of their present home
	What kind of pet do you have?
	Which mobile operator do you have a pre-paid or post-paid contract with?
	Your internet service provider/TV operator
	Do you make purchases on the Internet?
	Which bank(s)/financial institutions are you a customer of?
	Which banking services do you use?
	Have you ever donated to an organisation?
	Which voluntary pension fund are they a member of?
	Which health and mutual funds are you a member of?
	What type of insurance do you have?
	Which insurance companies are you a customer of?
	Which is the category and age of the cars you own?
	Do you take vacations?
	What types of trips would you like to take?
	What topics interest you? (interests, based on a list)
	How do you normally read the news? (printed press or online)
	Which of these describes the financial situation of your household? (based on a subjective income status list)
	Roughly what is the net monthly income of your household?
MyPost Card marketing	name
	date of birth
	No
	address:
	citizenship (Hungarian or foreign national)
	postal address
	e-mail address
	phone number
	customer identification number (LUA identifier)
	purchase data of obtained goods and used services (type of good or service, its price, total amount, date and time and location of use)
	level of education (8 years primary, secondary, tertiary)
	data related to household status (single, multiperson (no children, one child, two, three or more children under 18))
	services intended to be used in the future (Government bonds, Bank deposit, Prize Draw deposit, investment fund units, Savings combined with insurance, Banking services (account keeping, loans), Life insurance, Property insurance (house, contents, motor), Travel insurance, Home savings, Regular parcel dispatch, courier service, Other postal service)
	purchasing objectives (immoveable property (purchase, exchange, building, renovation, etc.), Travel, Car purchase, Purchase of other consumer durables, Saving for health purposes, Financial reserves, Solutions for home and other property security)
	MyPost marketing
e-mail address	
phone number	

Philatelic (stamp) marketing	name
	address
	e-mail address
	phone number
Sales assistance	name
	phone number
	e-mail address
	agreed date of notification
	are you planning to purchase or renovate a property in the future, and if so, approximately when
	are you planning a vacation, vehicle purchase or refurbishment in the future, and if so, approximately when
	are you planning a vehicle purchase or refurbishment in the future, and if so, approximately when
	are you planning to purchase consumer durables in the future, and if so, approximately when
	are you planning to increase your savings in the future, and if so, approximately when
are you planning to insure your home or assets in the future, and if so, approximately when	
Advertisements sent to mailbox renters	name
	address
	phone number
	number and post code of the P.O. Box

#### 18.4. How long do we process the data?

Data processing	Duration of data processing
Lifestyle database	until the consent is withdrawn, but no later than 5 years following the date on which the data of the questionnaire is entered into the database
MyPost Card marketing	until the consent is withdrawn, but no later than 2 years following the date on which the card is last active.
MyPost marketing	until the consent is withdrawn
Philatelic (stamp) marketing	until the consent is withdrawn, but no later than 5 years following the receipt of the statement of consent
Sales assistance	until the consent is withdrawn, but no later than 30 years following the registration of the data
Advertisements sent to mailbox renters	Until their consent is withdrawn, or, in the absence thereof, no later than the date on which the rental contract for the P.O. Box expires.

The data subject may at any time withdraw their consent, however such withdrawal shall not affect the lawfulness of data processing activities based on consent before its withdrawal.

#### **18.5. Do we use data processors?**

Magyar Posta Zrt uses EPDB Nyomtatási Központ Zártkörűen Működő Részvénytársaság (1117 Budapest, Budafoki út 107-109, Company registration no: 01 10 048079, Tax number: 24924243-2-43) to contact individuals by e-mail or post and to produce leaflets, newsletters, informative materials and forms with the use of its printing and e-mailing services as well as the e-mailing services of Magyar Posta Zrt's current creative agency. The data of the current creative agency of Magyar Posta Zrt can be found on the [www.posta.h](http://www.posta.h) website under the Privacy Notice menu point.

In the case of MyPost marketing and MyPost Card marketing related data processing, the statement of consent is provided through Magyar Posta Zrt's MyPost interface. For the management of the interface, Magyar Posta Zrt employs

- Dorsum Informatikai Fejlesztő és Szolgáltató Zrt (Company registration no.: 01-10-044594; Tax number: 12657496-2-41; Registered office: 1012 Budapest, Logodi utca 5-7, Floor 3 Apartment 18; [www.dorsum.eu](http://www.dorsum.eu)) to operate the electronic posting list application's online interface,
- Microsoft Ireland Operations Limited (Customer Care Centre, Atrium Building Block B, Carmanhall Road, Sandyford Industrial Estate, Dublin 18, Ireland) to provide Azure services, which provide the necessary servers and storage space for the operation of the application, as data processors.

During the use of the data processors Magyar Posta Zrt does not transfer data to countries outside of EEA Member States (European Union Member States and Norway, Lichtenstein and Iceland). If for any reason the data is required to be forwarded to data processors in countries outside of EEA Member States (European Union Member States and Norway, Lichtenstein and Iceland), Microsoft Ireland Operation Limited shall adhere to the contractual terms and conditions published in the annex of European Commission Decision no. 2010/87/EU (5 February 2010) on Standard Contractual Clauses for the Transfer of Personal Data to Processors Established in Third Countries under Directive no. 95/46/EC of the European Parliament and of the Council.

In the case of data processing related to the marketing of the MyPost Card, Magyar Posta Zrt employs Microsegment Consulting Partners Zrt-t (2234 Maglód Rudolf utca 11, Company registration no.: 13-10-040952) as a processor, to analyse the services used by the data subject and the personal characteristics and preferences provided by the data subject, through which it classifies the customers into customer groups by processing these data.

#### **18.6. Who may access the data?**

Magyar Posta stores and processes the data of the presented types of data processing in separate databases. In order to protect and safeguard data, the persons authorised to access them are appointed in different departments. There are no persons who have access to all data. The data stored in the separate databases may only be accessed by the appointed employees who have the task of analysing the data in order to define the target group of the advertisement to be sent. Apart from these, the contact data (postal address or e-mail or telephone number) of addressees selected based on the analysis of the database according to name and the means of sending the advertisement are only accessed by individuals who address the advertisements to be sent or contact the addressee of the advertisement, or are the employees handling the complaints of advertisement addressees.

There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

## 19. Conducting prize competitions

As part of the promotion of its products and services, Magyar Posta organises prize competitions and draws during which the data of the entrants are processed in order to select the winners and give the winners their prizes.

### 19.1. On what legal basis is Magyar Posta Zrt entitled to process data?

Magyar Posta Zrt processes the data of the entrants based on their voluntary consent which is evident in that the data subjects give their data voluntarily in the knowledge of the contents of the privacy statement featured in the competition rules in order to participate in Magyar Posta Zrt's current prize competition. [based on the General Data Protection Regulation, Article 6 (1) a)]

### 19.2. What type of data do we process?

data	Why?
name	<ul style="list-style-type: none"> <li>– to identify the person of the entrant</li> <li>– to pay the tax on the winner's prize if Magyar Posta undertakes to do so</li> </ul>
address:	<ul style="list-style-type: none"> <li>– to identify the person of the entrant</li> <li>– to contact and notify the winner</li> </ul>
phone number	to contact and notify the winner

e-mail address	to contact and notify the winner
date of birth	– to check eligibility if there is such a condition to take part in the competition
photograph	– to take a photograph of accepting the prize, – to use for information about the prize competition
tax identification number	to pay the tax on the winner's prize if Magyar Posta undertakes to do so
ID (e.g. Facebook ID, MyPost Card ID, mail item identifier etc.)	– to identify the person of the entrant – to check eligibility if there is such a condition to take part in the competition

Depending on the conditions of the prize competition, Magyar Posta only asks for some of the data listed here, only requesting those which are essential for conducting the competition as and when necessary. The rules of the current competition contain information about this. For example, due to assuming payment of the tax obligation on the prize, Magyar Posta only asks those winners who accept the prizes for the relevant data.

### **19.3. For what purpose we process data?**

Magyar Posta may only process data for the purpose of

- being able to conduct prize competitions and drawing winners of the prizes from the entrants,
- contacting winners and giving them their prizes,
- paying the tax obligation on the prize if Magyar Posta assumes this,
- taking a photograph of the prize being awarded and featuring this in information about the prize competition provided the winner consents to having a photograph taken when accepting the prize.

### **19.4. How long do we process the data?**

Magyar Posta Zrt processes the data of the entrants until the draw and then erases them. Thereafter, Magyar Posta Zrt only processes the data of the winners until the prizes are awarded and, if Magyar Posta Zrt has assumed payment of the tax obligation, it processes the data processed in connection with taxation listed under point 19.2 for 5 years after the year of the tax return [Section 202 of Act CL of 2017

on the Rules of Taxation]. Naturally, the data subject may withdraw consent to his or her data being processed at any time during the prize competition, in which case Magyar Posta shall erase the data. The entrant whose data Magyar Posta Zrt erased at their request before the draw cannot take part in the prize draw and consequently cannot be a winner, and if the winner requests their data to be erased before receiving the prize, that person cannot then accept the prize. The data subject may at any time withdraw their consent, however such withdrawal shall not affect the lawfulness of data processing activities based on consent prior to the withdrawal.

#### **19.5. Do we use data processors?**

Magyar Posta Zrt uses a data processor to conduct some prize competitions and it provides preliminary information about this in every case in the rules for the competition.

#### **19.6. Who may access the data?**

The data may be accessed by Magyar Posta Zrt's communication staff appointed to conduct the competition and the prize draw (campaign managers and communication staff) and, if the prize is awarded at a post office, the postal employees working at the post office in question. If Magyar Posta assumes paying the tax obligation on the prize instead of the winner, the data related to the fulfilment of the tax obligation may also be accessed by staff involved in tasks connected with tax returns.

The data of winners which are necessary to advise the winners will be published by Magyar Posta in accordance with the competition rules and thus they may be accessed by anyone.

If the winner agrees to Magyar Posta taking a photograph of the prize being awarded and this being used for information about the prize competition, the photographs will be published.

There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

## **20. Customer Service**

Magyar Posta Zrt is obliged to operate a customer service to enable its customers to make complaints and submit claims for compensation verbally, in writing and through the Internet at a central customer service point as well as at post offices. [Postal

Services Act, Section 57 (3) and Act CLV of 1997 on Consumer Protection, Section 17/B (1)]

Magyar Posta Zrt has organised its customer service to ensure that any data subject who wishes to contact Magyar Posta Zrt to make a complaint, enquire about a service or exercise a right related to their personal data (request erasure, restriction, rectification of or access to data, object, withdraw consent, enquire about data portability) can contact Magyar Posta Zrt through it.

#### **20.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

- the processing of personal data for the handling of customer claims relating to postal services is necessary for the validation of the legitimate interest if Magyar Posta Zrt, which is demonstrated by the fact that without the processing of the data the customer claims could not be investigated, answers could not be sent to the data subject and it would be impossible to process the indications of data subjects. This would not only violate the interests of the data subject, but also the lawful economic interests of Magyar Posta Zrt, as it may lead to customer complaints, and Magyar Posta Zrt has a socially recognised interest to preserve its reputation and customer satisfaction. [General Data Protection Regulation, Article 6 (1) f)]

and

- in relation to complaints, statements to be recorded as complaints and compensation claims, the legal obligations for data processing are provided by Section 57 of Act CLIX of 2012 on Postal Services [General Data Protection Regulation, Article 6 (1) c)]

This provision requires Magyar Posta to deal with complaints both at postal outlets and at a central customer service point, stipulating the length of time these can be made and the time limit for replying to them.

- in relation to the processing of data relating to complaints, the legal obligation is provided by Sections 17/A-17/C of Act CLV of 1997 on Consumer Protection (hereinafter: Consumer Act) [General Data Protection Regulation, Article 6 (1) c)]

This statute, in harmony with the Postal Services Act, also requires Magyar Posta to operate a customer service, stipulating the type of data Magyar Posta has to record about complaints, and to make an audio recording of complaints reported over the phone stating the deadline for storing these.

## 20.2. What type of data do we process?

data	Why?
consumer's name [Consumer Act, Section 17/A (5) a)]	<ul style="list-style-type: none"> <li>– to identify the consumer</li> <li>– to be kept in the record about the complaint</li> </ul>
consumer's place and date of birth	to identify the consumer
consumer's mother's name	to identify the consumer
consumer's address and correspondence address [Consumer Act, Section 17/A (5) a)]	<ul style="list-style-type: none"> <li>– to send the reply to the consumer</li> <li>– to be kept in the record about the complaint</li> </ul>
consumer's e-mail address	to send the reply to the consumer
consumer's telephone number	to call the consumer back if the consumer made contact by phone
personal data provided in the documents, written or verbal complaint or claim submitted by the consumer [Consumer Act, Section 17/A (5) c)]	to support or prove the consumer's request, to establish its justification
consumer's signature [Consumer Act, Section 17/A (5) e)]	<ul style="list-style-type: none"> <li>– to prove that the complaint or request originates from the consumer</li> <li>– to be kept in the record about the complaint</li> </ul>
unique identification number of complaint [Consumer Act, Section 17/A (4) and (5) (g), and Section 17/B (3)]	<ul style="list-style-type: none"> <li>– to identify, record and trace audio recordings made of a complaint received over the phone</li> <li>– to be kept in the record about the complaint</li> </ul>
audio recording, caller ID and start and end of the conversation conducted with the consumer [Consumer Act, Section 17/B (3)]	to document the consumer's request and prove its content
the place, date and means of submitting the complaint [Consumer Act, Section 17/A (5) b)] the place, date and means of submitting the consumer needs	<ul style="list-style-type: none"> <li>– to record the complaint,</li> <li>– to be listed in the record of the complaint</li> <li>– record of consumer needs</li> </ul>
the registration place and date of the record [Consumer Act, Section 17/A (5) f)]	to be listed in the record of the complaint
transaction type	to investigate, support, prove and determine the legitimacy of the consumer's request
personal data (the scope of the data is listed with the individual services) processed during the performance of the concerned	to investigate, support, prove and determine the legitimacy of the consumer's request



service based on transaction type, for example: name of the subscriber, mail item identifier	
amount of compensation or indemnification	for the payment of the compensation or indemnification due to the consumer
bank account number	for the payment of the compensation or indemnification due to the consumer
customer identification number	to identify the consumer
agreement identifier	for the identification of the service used by the consumer

### **20.3. For what purpose we process data?**

Magyar Posta processes consumers' data for the purpose of

- fulfilling their requests,
- checking the contents of their queries and complaints,
- responding to them,
- keep a record of them for the period of time specified by law,
- credibly proving their contents.

### **20.4. How long do we process the data?**

Magyar Posta Zrt processes the consumer data relating to their request for five (5) years following the submission of their request, because within this period the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt and the data subject in court.

Magyar Posta Zrt must keep records of complaints and their responses for 5 years. [Consumer Act, Section 17/A (7)]

Magyar Posta Zrt must keep audio recordings for 5 years. [Consumer Act, Section 17/B (3)]

If data processing becomes necessary due to the establishment, exercise or defence of any legal claim related to the request of the consumer (e.g. court proceedings), Magyar Posta Zrt processes the data for the period necessary for the establishment, exercise or defence of the legal claims.

### **20.5. Do we use data processors?**

For performing its customer service activity, Magyar Posta uses its contractors and agents in providing the service if this is essential. Such a case is when, for example, a complaint or customer request is received by Magyar Posta related to a service

which Magyar Posta performed through a contractor, or when a contractor or agent registers a data subject's request on behalf of Magyar Posta. The data of Magyar Posta Zrt's contributors and agents can be found in the information relating to individual services or on the [www.posta.h](http://www.posta.h) website under the Privacy Notice menu point.

#### **20.6. Who may access the data?**

The data are accessible to Magyar Posta Zrt's employees involved in providing the customer service activity and dealing with the investigation of complaints, thus staff receiving phone calls and e-mails (contact centre operators) and colleagues responsible for keeping in contact with consumers (customer correspondence staff).

There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

Depending on the nature of each service, more than one authority may exercise control over Magyar Posta Zrt's customer service activity. In the case of postal services the National Media and Infocommunication Authority [Address: 1015 Budapest, Ostrom u. 23-25, Correspondence address: 1525 Budapest P.O. Box: 75, Telephone: (+36 1) 457 7100 Fax: (+36 1) 356 5520 E-mail: [info@nmhh.hu](mailto:info@nmhh.hu) Website: [www.nmhh.hu](http://www.nmhh.hu)], and in the case of financial services Magyar Nemzeti Bank [Address: 1054 Budapest, Szabadság tér 9, E-mail: [ugyfelszolgalat@mnbb.hu](mailto:ugyfelszolgalat@mnbb.hu)]. Furthermore, the Magyar Nemzeti Bank settles disputed matters out of court via the Financial Arbitration Board [Address: 1013 Budapest, Krisztina krt. 39 Correspondence address: H-1525 Budapest P.O. Box.: 172 Phone: +36-40-203-776 E-mail: [ugyfelszolgalat@mnbb.hu](mailto:ugyfelszolgalat@mnbb.hu)].

Magyar Posta Zrt is obliged to forward the data to the National Media and Infocommunications Authority if the complainant does not accept Magyar Posta's response to the complaint and initiates proceedings before the authority [Postal Services Act, Sections 57 (11) and 53]

Magyar Posta Zrt's activity related to consumers within its postal financial activity is supervised by the Magyar Nemzeti Bank and Magyar Posta Zrt is obliged to supply data to the MNB if so required [MNB Act, Section 48 (4)] Furthermore, the Magyar Nemzeti Bank settles disputed matters out of court via the Financial Arbitration Board, so in the event of proceedings before the Financial Arbitration Board the data may also be accessed by the Board (MNB Act, Section 108).

#### **20.7. Can I ask for a copy of the audio recording?**

Yes. The consumer may be given a copy of the audio recording upon request, which Magyar Posta Zrt will provide free of charge. [Consumer Act, Section 17/A (7)] In order to protect the data, Magyar Posta Zrt will save the audio recording onto a data carrier and hand it over to the data subject in person or send it in a way that only the addressee or an authorised representative may take possession of it. Magyar Posta Zrt will only forward an audio recording by e-mail at the consumer's explicit request made in the knowledge of the risks of sending material by e-mail.

## **21. Data processing to measure the quality of service**

Magyar Posta Zrt is committed to providing high-standard services. To this end, Magyar Posta regularly measures compliance with predetermined requirements and service levels by, for instance, sending test mail.

### **21.1. On what legal basis is Magyar Posta Zrt entitled to process data?**

Magyar Posta Zrt processes the data based on the prior and voluntary consent of the data subjects [General Data Protection Regulation, Article 6 (1) a)]. Customers who give their data to Magyar Posta Zrt for the purpose of, for instance, sending test mail, assist the Company in these quality assessments.

### **21.2. What type of data do we process?**

<b>data</b>	<b>Why?</b>
name	to contact the person involved in the quality measurement (e.g. to appear as the addressee on test mail)
postal address	to contact the person involved in the quality measurement (e.g. to deliver test mail)
e-mail address	to contact the person involved in the quality measurement (e.g. to check compliance with quality measurement requirements)
phone number	to contact the person involved in the quality measurement (e.g. to check compliance with quality measurement requirements)

### **21.3. For what purpose we process data?**

Magyar Posta processes data to be able to check and measure whether the performance of their services meet the relevant quality requirements, whether performance exceeds them and, if so, to what extent.

#### **21.4. How long do we process the data?**

Magyar Posta Zrt processes data for 12 months after they have been recorded. Naturally, the data subject may withdraw their consent prior to this at any time, in which case Magyar Posta Zrt will erase their data.

However such withdrawal shall not affect the lawfulness of data processing activities based on consent prior to the withdrawal.

#### **21.5. Do we use data processors?**

Magyar Posta Zrt does not use data processors.

#### **21.6. Who may access the data?**

The data may be accessed by Magyar Posta Zrt's employees involved in quality assessment. (quality assessment and analytical employees and quality control employees). If quality is measured by sending test mail, staff involved in performing the postal service (acceptance clerks, sorters and delivery personnel) have access to the name and address of the addressee of the test mail as the letter or parcel reaches the addressee as a result of their work.

### **22. Application for a position and the labour market database**

Magyar Posta Zrt processes the data of job applicants during its job advertisement or, if no advertisement is running, if there is a vacant or available position, according to the specifications detailed this section.

Additionally, Magyar Posta Zrt offers an opportunity to people seeking employment with them, to request Magyar Posta Zrt to retain their application even if there is no position that can currently be offered to them or they are not hired for the advertised position. The application of the data subject can be entered in a database created for this purpose, allowing Magyar Posta to contact him or her if a post that the data subject is qualified for and has the experience to fill becomes vacant.

#### **22.1. On what legal basis is Magyar Posta entitled to process data?**

Magyar Posta Zrt processes data based on the voluntary consent of the data subjects which is evident in the fact that people interested in vacancies apply to Magyar Posta Zrt by forwarding their own data. [General Data Protection Regulation, Article 6 (1) a)]

If there is no vacant or available position, then the voluntary consent of the data subject is also revealed by the fact that they specifically request to be included in the labour market database containing the data of individuals interested in job opportunities. [General Data Protection Regulation, Article 6 (1) a)]

If the data subject sends a curriculum vitae or an enquiry only, Magyar Posta draws attention to the opportunity of being entered in the labour market database and completing the necessary declaration for this database. If the data subject wishes to take advantage of this opportunity, Magyar Posta will record the sent data in the database. Otherwise, Magyar Posta Zrt returns the data or, if the data subject so requests, destroys or erases them.

## 22.2. What type of data do we process?

data	Why?
name	to identify, record and solicit the person interested in vacancies
address for notifications	to contact the person interested in vacancies, to send notifications of vacancies
phone number	to contact the person interested in vacancies, to send notifications of vacancies
e-mail address	to contact the person interested in vacancies, to send notifications of vacancies
other personal data sent voluntarily when enquiring about vacancies, in particular:	
where the data subject wishes to be posted (area of activity, professional field and/or geographical area)	to select the job vacancy
data given in the curriculum vitae (typically identification information such as place and date of birth, level of education, qualifications, vocational qualifications, professional experience, requirements related to the vacancy)	to assess suitability for the vacancy
information given in motivation letter (why the application was submitted to Magyar Posta)	to select the job vacancy
data appearing in documents proving qualifications (level of language skills, class of degree, grade of matura, etc.)	to assess suitability for the vacancy
data related to reduced capacity to work (a medical opinion issued by a specialist body of the change in capacity to work, state of health, degree of health impairment and disability status of the data subject) [Act CXCI of 2011, Section 23 (7)]	if the data subject requests Magyar Posta to consider this in assessing the job application

We point out to data subjects that, if they ask for their reduced capacity to work to be considered in seeking a vacancy and during employment in a job and for this they send a copy of the medical opinion issued by a specialist body, they should only leave data related to their identity and about their reduced capacity to work, state of health, degree of health impairment and disability status in the medical opinion and erase all other information such as information relating to the nature of their health impairment, medical treatment and illness.

### **22.3. For what purpose we process data?**

Magyar Posta processes data to select suitable applicants for jobs that become vacant from people who themselves wish to find a post at Magyar Posta.

### **22.4. How long do we process the data?**

For job advertisements or even if no advertisement is running, for the currently vacant or available position selection, the data is processed by Magyar Posta Zrt until the conclusion of the selection procedure, i.e. until the position is filled or until a decision is made to close the position due to the lack of a suitable candidate.

Magyar Posta Zrt processes the data of applicants in the labour market database for 1 year from the date of application and then erases the data without notifying the applicant and destroys documents submitted or returns them to the applicant.

Naturally, the data subject may withdraw their application (consent to data processing) within this period, in which case Magyar Posta Zrt shall erase the data after the withdrawal of consent and destroy documents submitted or return them to the applicant.

The applicant may request the erasure of their data and their consent to be withdrawn by writing to Magyar Posta Zrt at 1540 Budapest or by sending an e-mail to [toborzas@posta.hu](mailto:toborzas@posta.hu).

The withdrawal of consent shall not affect the lawfulness of data processing activities based on consent prior to the withdrawal.

### **22.5. Do we use data processors?**

Magyar Posta does not use data processors to process data in its labour market database.

### **22.6. Who may access the data?**

The data may be accessed by personnel at Magyar Posta Zrt involved in the recruitment and selection of labour, and the manager deciding about employing the

data subject for the vacancy (exercising employer's rights). Magyar Posta Zrt does not transfer the data to other organisations or individuals.

## 23. Document management of Magyar Posta Zrt

Magyar Posta Zrt, as a body performing public service functions, must adhere to strict rules on document management. As a result, it is obliged to keep a record of the received and sent documents, as well as the documents generated during its operation. Personal data shall also be processed during this activity.

### 23.1. On what legal basis is Magyar Posta entitled to process data?

Magyar Posta Zrt processes personal data

- pursuant to the provisions specified in Sections 4, 9 and 12 of Act LXVI of 1995 on Public Documents, Public Archives and Protection of Private Archive Materials, which creates a legal obligation for the processing of data [General Data Protection Regulation, Article 6 (1) c)]

Detailed rules regarding data processing are set out in the following legislation:

- Articles 14 and 39 of Government Decree No. 335/2005 on the General Requirements of the Filing System of Organs Performing Public Duties and
- the Decree of the Ministry of Interior No. 3/2018 (21 February) BM on the Requirements of Document Management Software Used by Organs Performing Public Duties.

### 23.2. What type of data do we process?

Data	Why?
name of the sender and addressee [Gov. Decree No. 335/2005, Article 39 (2) f) and g)]	necessary for the identification of the sender and addressee
address of the sender and addressee [Gov. Decree No. 335/2005, Article 39 (2) f) and g)]	necessary for communication
name of the administrator [Gov. Decree No. 335/2005, Article 39 (2) j)]	to identify the individual responsible for the transaction
name administrator's organisational unit [Gov. Decree No. 335/2005, Article 39 (2) j)]	to identify the individual responsible for the transaction

phone number	necessary for communication
e-mail address	necessary for communication
document ID, registration number [Gov. Decree No. 335/2005, Article 39 (2) a)]	necessary for the identification of the document
date and manner of receipt, receipt ID [Gov. Decree No. 335/2005, Article 39 (2) c)]	it is necessary to register and retrieve the document
date of issue [Gov. Decree No. 335/2005, Article 39 (2) b)]	it is necessary to register the document
date and manner of sending [Gov. Decree No. 335/2005, Article 39 (2) e)]	it is necessary to register the document
subject of the transaction document [Gov. Decree No. 335/2005, Article 39 (2) k)]	necessary for the identification of the transaction

### **23.3. For what purpose we process data?**

Magyar Posta Zrt processes the data for the registration of the documents and their senders, to fulfil the obligations set out for bodies with public service functions, i.e. to provide transparency in the operation and activity of bodies with public service functions and to preserve documents of lasting value for public interest archiving purposes.

### **23.4. How long do we process the data?**

In relation to the given documents, the document related data processing occurring during document management shall be carried out for the period specified in the Archive Plan approved by the National Archives of Hungary. The documents of lasting value shall be provided to the competent public archives by Magyar Posta Zrt for fifteen years following its calendar year of creation. [Act LXVI of 1995, Section 12]

### **23.5. Do we use data processors?**

Magyar Posta Zrt uses a data processor for data processing of archives (registering, storing, processing). The data processor is DocuTár Iratrendező és Tároló Szolgáltató Korlátolt Felelősségű Társaság (1093 Budapest, Czuczor utca 10 IV-V, Company registration no: 01 09 703896 Tax number: 12797138-2-43 docutar@docutar.hu), which performs the registration, storage and processing of the mandatory data content necessary for the archiving of paper-based documents.

### **23.6. Who may access the data?**



Access to the data is granted to persons who are required to process, transfer or file paper-based documents, and they are also granted access to the Electronic Filing System of Magyar Posta Zrt.

There are special units dedicated to regularly checking Magyar Posta Zrt's internal operations and the compliance of its activities with regulations, thus the staff engaged in such controls (operations inspectors, internal auditors, security and protection staff, data protection officer) have access to these data provided this is essential for carrying out their duties.

The rules of access to personal data contained in documents transferred to the National Archives of Hungary are contained within Sections 24 to 29 of Act LXVI of 1995 on Public Documents, Public Archives and Protection of Private Archive Materials.

## **24. Security of personal data**

Magyar Posta takes all the security, technical and organisational measures required to guarantee the security of data through its organisational units.

### **24.1. Organisational measures**

Within Magyar Posta the functions of operating and developing data protection, IT security, security and confidentiality, and information technology systems are organised separately and independently of each other.

In implementing Magyar Posta Zrt's IT developments, the opinion of the data protection officer and the information technology security department must be obtained in the planning stage to ensure that IT security and data protection aspects are taken into consideration. Magyar Posta Zrt classifies all its IT systems into security classes, for which information technology security requirements have been set. Developers and operators must comply with these requirements in developing and operating the system.

Magyar Posta allows access to its IT systems through personal authorisation. In allocating authorisations the principle of necessary and sufficient rights is applied, i.e. the Company's IT systems and services can only be used by all users to the extent necessary to fulfil their duties, with due authorisation and for the period of time required. Authorisation to use the IT systems and services is only given to persons who are not subject to restriction for security or other reasons (e.g. conflict of interests) and have the necessary professional, business and information security skills required for their safe use.

In operating our information technology systems, in particular breach management and change management, and developing these, internationally accepted methods and recommendations (e.g. ITIL) are taken into account.

Magyar Posta organises its internal operations through internal regulations as well. The prior opinion of the data protection officer must be sought about the internal regulation of processes affecting personal data both during their development and amendment.

All Magyar Posta employees make a written declaration undertaking to fulfil strict confidentiality rules upon entering into employment and must act in accordance with these confidentiality rules in the performance of their duties.

A requirement is not to leave documents containing personal data on the desks after finishing work; these must be locked away by employees in order to prevent unauthorised access. (so-called clean desk policy)

## **24.2. Technical measures**

Magyar Posta Zrt protects the buildings operated by it, their premises and therefore also the processed, handled and stored data within, with various security systems (e.g.: alarm, cameras, bars, authorisation checking entry systems, fire protection systems, etc.). Furthermore, Magyar Posta also uses time-lock safes as well.

Except for data stored by its data processors, Magyar Posta stores data on its own equipment in data centres. Magyar Posta keeps the information devices storing data in a separate, locked server room protected by a multi-level entry system linked to authorisation checks.

Magyar Posta protects its internal network with multi-layer firewall protection. A hardware firewall (border protection device) is installed everywhere at the entry points of public networks used in every case.

Magyar Posta uses redundancy to store data, i.e. stores data at several places, to protect them from destruction, loss or damage due to a device error, or illegal destruction.

Our internal networks are protected from external attacks through multi-level, active, complex protection against malicious codes (e.g. virus protection).

The indispensable external access to the IT systems and databases operated by Magyar Posta is realised through encrypted data connection (VPN).

We do our utmost to ensure that our information technology devices and software continuously comply with the generally accepted technological solutions used in market operation.

During developments we create systems which can be controlled through logging, and where transactions can be traced and the occurrence of privacy incidents, such as unauthorised access, can be detected.

Magyar Posta destroys paper-based data upon the expiry of the retention period in compliance with the prescribed data protection requirements. Destruction is carried out under strict security requirements by the data processors of Magyar Posta Zrt, with the use of shredding and compacting machines, which are regularly reassessed by Magyar Posta Zrt. The up-to-date list of data processors is available online on the [www.posta.hu](http://www.posta.hu) website, under the Privacy Notice menu point.

## **25. What rights do I have in relation to my data? (rights of the data subject)**

The data subject's rights:

- withdrawing consent
- requesting access (information)
- requesting rectification of the data
- requesting erasure of the data
- requesting restriction of processing
- objecting to data processing
- requesting human intervention in the case of automated decision-making
- requesting data portability

### **25.1. Withdrawing consent**

When Magyar Posta Zrt processes personal data on the basis of the consent of the data subject, the data subject has the right to withdraw their consent at any time without restriction. With this the data subject expresses that they no longer wish for Magyar Posta Zrt to process their data. This however shall not affect the lawfulness of data processing activities based on consent prior to the withdrawal.

As a consequence of the withdrawal of the consent, Magyar Posta Zrt shall erase the personal data processed on the basis of the consent. The data shall not be erased if there is a legitimate reason for their processing,

- for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- for the fulfilment of a legal obligation or a public interest task, or
- for the protection of the vital interests of the data subject or others, or
- for the enforcement of the legitimate interests of Magyar Posta Zrt or a third party.

### **25.2. Requesting access (information):**

The data subject may at any time request information regarding whether Magyar Posta Zrt is processing their data, and if so, be granted access to them.

If, in their request, the data subjects do not specify what information they require regarding the data processing related to them, then, in addition to their data, we provide information on the below:

- what data Magyar Posta processes,
- where these were obtained from (source of the data),
- why Magyar Posta processes the data (purpose of data processing),
- the basis entitling Magyar Posta to process data (the legal basis),
- from when until when Magyar Posta processes the data (duration),
- whether Magyar Posta involves a data processor in processing the data,
- if a data processor is involved,
  - who it is (the name of the data processor),
  - its address (the address of the data processor),
  - what it does with the data (its activity related to data processing),
- whether Magyar Posta Zrt has transferred their data to anyone and, if so, to whom (recipient of data transfer)
- what rights the data subjects have regarding the processing of their data.
- if Magyar Posta Zrt processes the data of the data subjects in such a way that based on their data, without human intervention, a consequence is incurred by or a decision is adopted relating to the data subjects, then regarding this fact, its manner and its implications for data subjects
- if the data subject's data are transferred to countries outside of EEA Member States (European Union Member States and Norway, Lichtenstein and Iceland) or to international organisations by Magyar Posta Zrt, then regarding the fact that in such cases it ensures appropriate data processing is carried out.

In certain cases, such as the prevention of crime or for national security interests, Magyar Posta must refuse to provide information based on the provisions of the law.

### **25.3. Requesting rectification (amendment) of the data**

The data subject may request that data be corrected. If the data subject's data that Magyar Posta processes are erroneous or untrue, the data subject may request that they be changed for correct, true data. For example, if a customer requesting the MyPost Card wishes to give a new telephone number or postal address, they may request Magyar Posta Zrt to amend their old details.

The data subject must support the authenticity of the new data and verify that he or she is entitled to request the change. Only in this way can Magyar Posta ascertain that the new data are true and, if they are, whether the old data can be amended.

If it is not clear whether the processed data is correct or accurate, Magyar Posta Zrt does not rectify the data, but instead restricts it until the accuracy of the data is verified.

#### **25.4. Requesting erasure of the data**

The data subject may request the erasure of their data.

In the case of an erasure request received in relation to data processing based on the consent of the data subject, Magyar Posta Zrt shall consider the request as a withdrawal of consent and erase the personal data. The data shall not be erased if there is a legitimate reason for their processing,

- for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- for the fulfilment of a legal obligation or a public interest task, or
- for the protection of the vital interests of the data subject or others, or
- for the enforcement of the legitimate interests of Magyar Posta Zrt or a third party.

However, in the case of data processing based on consent, erasure always takes place if Magyar Posta Zrt was to perform the collection of children's data in connection with the online services offered to children. Such a service is not provided by Magyar Posta Zrt.

If the data subject requested the erasure of their data in relation to a data processing activity which is necessary to carry out the public interest task of Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) e)] or is performed based on the legitimate interest of Magyar Posta Zrt or a third party [General Data Protection Regulation, Article 6 (1) f)], then Magyar Posta Zrt shall consider this erasure request to be an objection to the processing of data. If the objection is justified (there is no reason why the data should be processed) Magyar Posta Zrt shall erase the data.

If the data is required to be processed in order to fulfil a contract, to take the steps requested by the data subject prior to the conclusion of the contract, to comply with a legal obligation or to protect of the vital interests (e.g. life) of the data subject or third party, then, regardless of the erasure request, Magyar Posta Zrt shall only erase the data, if the personal data is no longer required.

In other cases, Magyar Posta Zrt erases the data if it is determined that they have been processed unlawfully or a Hungarian or European Union legal obligation stipulates their erasure.

Magyar Posta Zrt cannot erase data, the processing of which is a legal obligation of Magyar Posta Zrt or is required for the fulfilment of a public interest task or is based on the public interest of the public healthcare sector (e.g. the prevention of an epidemic situation). Data must also be preserved that are processed for scientific

research, for inventory archiving or statistical purposes, or are required for the presentation, enforcement or defence of legal claims.

### **25.5. Requesting restriction of processing**

The data subject may request Magyar Posta Zrt to restrict the processing of their data. In this case the data of the data subject shall not be used by Magyar Posta Zrt, only stored. Magyar Posta Zrt restricts the processing of the data subject's data, if the data subject

- disputed the accuracy of their data processed by Magyar Posta Zrt, but the accuracy of the data subject's data is yet to be verified,
- objects to the erasure of their data by Magyar Posta Zrt, and request their storage,
- request that their data is stored by Magyar Posta Zrt, as they intend to initiate a legal claim with them (e.g. file a lawsuit)
- objected to the processing of the data and the grounds of the data subject's objection are yet to be determined.

Magyar Posta Zrt informs the data subject prior to the lifting of the restriction.

### **25.6. Objecting to data processing**

The data subject may object to data processing related to him or her. If this objection is well-founded, i.e. there are no compelling reasons for the processing of the data, then Magyar Posta Zrt ceases the data processing activity and erases the data.

The data subject may object if the data processing activity is necessary to carry out the public interest task of Magyar Posta Zrt [General Data Protection Regulation, Article 6 (1) e)] or is performed based on the legitimate interest of Magyar Posta Zrt or a third party [General Data Protection Regulation, Article 6 (1) f)].

In many cases, for instance when Magyar Posta has recorded data with the data subject's voluntary consent, the data subject's objection is really a request for deletion expressed as an objection. For example, when a MyPost Card holder objects to their data being processed, by doing so they requests the erasure of their data, and their data must be erased.

Objection, for example, is a complaint of the data subject against data processing, when Magyar Posta sends an advertisement to a name and address that can be purchased from the personal data and address register but the data subject does not wish to receive advertisements. In this event the data subject expresses his or her objection and Magyar Posta puts the name and address onto a black list in order not to send advertisements to that address again.

If the data is required to be processed in order to fulfil a contract, to take the steps requested by the data subject prior to the conclusion of the contract, to comply with a

legal obligation or to protect of the vital interests (e.g. life) of the data subject or third party, then, regardless of the objection, Magyar Posta Zrt shall only erase the data, if the personal data is no longer required.

Magyar Posta Zrt cannot erase data, the processing of which is a legal obligation of Magyar Posta Zrt or is required for the fulfilment of a public interest task or according to the public interest relating to the field of public health (epidemic situation), or for the presentation, enforcement or defence of legal claims.

For instance, when a customer needs to be screened from the aspect of the prevention of money laundering and terrorist financing, no declaration of consent is requested for completing the screening data sheet but data are recorded based on the legal requirement and, upon request from the National Tax and Customs Administration or if the suspicion of money laundering arises, the data will be transferred to the tax authority. If the customer subsequently objects to Magyar Posta transferring his or her data to the tax authority, this has no bearing on the data transfer as it is a legal obligation.

#### **25.7. Requesting human intervention in the case of automated decision-making**

Data processing carried out with automated decision-making means that based on the data provided an automated result is generate for the data subject determining what shall happen to the them based on their data, with no part of the process being influenced by human intervention. For example, based on their data their job application may be automatically evaluated, and if it does not meet the predetermined criteria, they shall receive and automated rejection message.

In these cases the data subject may request for a person to review the decision, if

- the automated decision-making takes place according to their consent or if
- it is necessary for the conclusion of a contract with them or for the execution of a contract preceding step (e.g. for the assessment of a contract concluding application).

Where a law requires data processing with automated decision-making, no human intervention may be requested.

#### **25.8. Requesting data portability**

The data subject may request that the data provided by them and processed by the given IT system of Magyar Posta Zrt be made available to them by Magyar Posta Zrt in an electronic format in a way that allows for their transfer to another data controller.

The data subject may request the portability of data in the cases of data processing that are based on their consent [General Data Protection Regulation, Article 6 (1) a)], or when it is required for the fulfilment of a contract to which the data subject is a

party or, where it is necessary to take action at the request of the data subject prior to the conclusion of the contract [General Data Protection Regulation, Article 6 (1) b)].

The data shall be provided by Magyar Posta Zrt based on the request, in an .xml or .csv format depending on the functionality of the data processing system.

If the data subject requests the transfer of their data directly from Magyar Posta Zrt to another data controller, then Magyar Posta Zrt assesses whether it has a suitable data connection which would allow for the safe and lawful transfer of the data, and if so, it shall directly transfer the data.

### **25.9. Where can I contact Magyar Posta in order to enforce my rights?**

A request [withdrawing consent, requesting access (information), requesting rectification of the data, requesting erasure of the data, requesting restriction of processing, objecting to data processing, requesting data portability] can be made at any time at the contact details given below:

- by post: Addressed to the Customer Service Directorate: 3512 Miskolc,
- by fax: (+36) 46-320-136,
- by e-mail: on the [ugyfelszolgalat@posta.hu](mailto:ugyfelszolgalat@posta.hu) e-mail address,
- by phoning (+36) 1-767-8282,
- in person: at Magyar Posta Zrt, Budapest, District X, Üllői út 114-116., and stationary post offices operated by Magyar Posta,

Magyar Posta Zrt may provide different contact details in its preliminary information data processing for different purposes but, irrespective of this, for all data processing the Customer Service Directorate can be contacted by the above means with data subjects' requests and complaints.

Magyar Posta Zrt shall respond to the request of the data subject without any undue delay, or by no later than within 1 month of the submission of the request.. If the request is very complex or a large number of requests have been submitted, then Magyar Posta Zrt is entitled to extend the deadline by an additional 2 months, but the data subject shall be informed of this fact within 1 month.

If for any reason we are unable to fulfil the request of the data subject, the reason for this shall also be communicated to the data subject within the 1 month period following the submission of their request.

We inform the parties concerned that for unfounded or repetitive or excessive requests referring to the same data we may calculate a performance fee or the reject the request.

Magyar Posta Zrt informs the concerned parties that if, in their erasure, rectification or data processing restriction request, they indicate that they would like Magyar Posta Zrt to inform them about the parties who processed their data or to whom their



data was transferred, then Magyar Posta Zrt shall inform the data subjects of these parties in their response to the request.

## **26. Who can I turn to for the protection of my rights?**

If you think that the way Magyar Posta processes your personal data infringes your rights, we suggest you first contact Magyar Posta with your complaint. Your complaint will be investigated in every case and we will do our utmost to address it.

If, despite having made a complaint, you continue to feel that Magyar Posta Zrt is not processing your data appropriately, or you do not wish to make a complaint but wish to turn to the authorities directly, you can submit a report to the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, postal address: 1530 Budapest, P.O. Box.: 5, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)., website: [naih.hu](http://naih.hu)).

You also have the option of taking legal action in order to protect your data. In this case you may decide whether to bring an action before the court based on your place of residence (permanent address) or temporary residence (temporary address) (<http://birosag.hu/torvenyszekek>).

You can find the court based on your permanent or temporary place of residence on the website <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.