

## PRIVACY NOTICE REGARDING ADVERTISING

By granting consent, the data subject can choose to receive from Magyar Posta Zrt. offers, advertisements and information concerning the products or services of Magyar Posta and its contractual partners, but in particular concerning the products and services of Magyar Posta.

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### 1. WHO PROCESSES THE DATA?

Magyar Posta Zrt. (registered office: 1138 Budapest, Dunavirág utca 2-6, company registration number: 01-10-042463, tax number: 10901232-2-44; postal address: 1540 Budapest, website: [www.posta.hu](http://www.posta.hu)), as the data controller.

Data protection officer's contact details: [adatvedelem@posta.hu](mailto:adatvedelem@posta.hu)

### 2. ON WHAT GROUNDS IS MAGYAR POSTA ENTITLED TO PROCESS THE DATA?

On the voluntary consent of the data subject, which is given by marking the relevant checkbox on the registration interface and registering, or given voluntarily on the interface of the application after registration. (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))

### 3. WHAT TYPE OF DATA DOES MAGYAR POSTA PROCESS?

Data provided during registration:

- e-mail address provided during registration

Data provided while using the service:

- e-mail address
- telephone number
- name
- address
- identification number (LUA) on the back of the MyPost Card

Data subjects should note that, if they have consented to the processing of their data for direct marketing purposes in the MyPost (ÉnPostám) Loyalty Programme and have given their LUA ID in the iCsekk application, Magyar Posta Zrt. will also process their data in accordance with the privacy notice governing the MyPost Loyalty Programme, which is available on Magyar Posta Zrt.'s website under "Privacy Notice" in the menu. ([https://www.posta.hu/adatkezelesi\\_tajekoztato](https://www.posta.hu/adatkezelesi_tajekoztato))

#### **4. FOR WHAT PURPOSE DOES MAGYAR POSTA PROCESS DATA?**

Magyar Posta Zrt. processes the data subject's data to establish contact with the data subject and to send its own offers, advertisements and information and those of its contractual partners to the data subject by e-mail, post, phone or SMS text message.

If the data subject has granted consent in the MyPost Loyalty Programme for the processing of personal data for direct marketing purposes and has entered the LUA ID in the iCsekk application, the data provided on the MyPost card application form and, from the beginning of participation in the MyPost Loyalty Programme, the data provided to Magyar Posta during purchases and using services (type of, fee for and amount of product or service; date and time, place, frequency of use; beneficiary/recipient; purpose and object of using the product or service (e.g. payment of common charges)), as well as the conclusions that can be drawn from these (purchasing power, financial situation, range of offers likely to attract interest) will be processed for the purposes below.

- To enable Magyar Posta Zrt. to contact the data subject with its own advertisements and offers as well as those of its contractual partners by e-mail, telephone, SMS text message or post (direct marketing);
- to analyse data on purchases and the use of services, purchasing habits, purchasing power, financial situation and the range of offers likely to attract interest (profiling) in order 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.

The privacy notice governing the MyPost Loyalty Programme is available on Magyar Posta Zrt.'s website under "Privacy Notice" in the menu ([https://www.posta.hu/adatkezesesi\\_tajekoztato](https://www.posta.hu/adatkezesesi_tajekoztato)).

#### **5. HOW LONG DOES MAGYAR POSTA PROCESS DATA?**

Magyar Posta Zrt. processes data until consent is withdrawn but at the latest until the registration of the iCsekk application is terminated.

#### **6. WHERE CAN CONSENT BE WITHDRAWN?**

The data subject can withdraw consent at any time without restriction and free of charge on the Settings interface of the iCsekk mobile application or by giving the necessary identification data (name, e-mail address)

- by post: to the address of the Customer Service Directorate (Ügyfélszolgálati Igazgatóság): 3512 Miskolc,
- by faxing (+36) 46-320-136,
- by e-mail at [ugyfelszolgalat@posta.hu](mailto:ugyfelszolgalat@posta.hu),
- by phoning (+36) 1-767-8282,
- in person: at Magyar Posta Zrt., Budapest, District X, Üllői út 114-116, and at Magyar Posta's permanent postal outlets,
- data protection officer's contact details: [adatvedelem@posta.hu](mailto:adatvedelem@posta.hu)

If the data subject notifies Magyar Posta of the withdrawal of consent for data processing or the modification of his or her data, the notification will be fulfilled within 3 working days of its receipt. Withdrawal of consent, however, does not affect the lawfulness of processing carried out based on consent before its withdrawal.

#### **7. WHO MAY ACCESS THE DATA?**

The data may only be accessed by the appointed employees who have the task of managing the database in order to send offers, advertisements and information using the contact details (e-mail address, postal address or telephone number) of recipients selected from the database according to name and means of sending. Magyar Posta Zrt.'s employees managing complaints made by the data subject also have access to these data.

There are special units dedicated to regularly checking Magyar Posta'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 officers) have access to these data provided this is essential for carrying out their duties.

#### **8. WHO DO WE TRANSFER YOUR DATA TO? (WHO ARE THE RECIPIENTS OF YOUR DATA?)**

The declaration of consent is made by marking the checkbox on the registration interface of Magyar Posta's iCsekk application and by finalising the registration. To operate the interface and register the

data of the persons who have given their consent, Magyar Posta Zrt. uses the services of Díjbeszedő Informatikai Korlátolt Felelősségű Társaság as a data processor (registered office 1117 Budapest, Budafoki út 107-109, Company registration number: 01-09-173831; e-mail: dbdt@dbdt.hu, website: <https://www.dbdt.hu>).

Magyar Posta Zrt. uses the e-mail sending services of Díjbeszedő Informatikai Korlátolt Felelősségű Társaság for the production of newsletters and information materials for personalised e-mail communications.

## **9. WHAT RIGHTS DO YOU HAVE?**

You can submit your request concerning personal data using the contact details set out in point 6.

Magyar Posta Zrt. must reply to the data subject's request without unjustified delay but within 1 month of the submission of the request at the latest. If the request is very complex or a large number of requests are submitted, Magyar Posta Zrt. is entitled to extend this deadline by 2 months but the data subject will be informed of this within 1 month.

If for any reason we are unable to fulfil the data subject's request, we will likewise inform the data subject of the reasons for this within 1 month of the submission of the request.

Data subjects should note that, in the event of unjustified requests or regularly repeated, excessive requests for the same data, a fee for fulfilling their request may be charged or the request may be refused.

Magyar Posta Zrt. informs data subjects that, if they indicate in their request for erasure, correction or restriction of data processing their wish for Magyar Posta Zrt. to inform them of the persons who processed their data or to whom their data have been transferred, Magyar Posta Zrt. will inform data subjects of these persons in its reply to their request.

## **10. REQUEST FOR ACCESS (INFORMATION):**

Data subjects may request information at any time regarding whether Magyar Posta Zrt. is processing their data, and if so, they may be granted access to these.

In the absence of an exact requirement of what in particular data subjects are interested in with regard to data processing, in addition to their data, we will provide information about the following:

- 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 grounds entitling Magyar Posta to process the 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,
- the persons Magyar Posta has disclosed or will disclose the data to,
- the rights of data subjects in relation to processing their data,
- if Magyar Posta transfers the data subjects' data outside the EEA member states (European Union member states and Norway, Lichtenstein and Iceland) or to an international organisation, the guarantee of appropriate data processing in such cases.

### **10.1. Request to rectify (change) data**

Data subjects may request that their data be rectified. If the data subject's data that Magyar Posta processes are erroneous or untrue, the data subject may request that they are changed for the correct, true data.

The data subject must provide proof of 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 assess whether the new data are true and, if they are, whether the old data can be changed.

If it is unclear whether the data processed are correct or accurate, Magyar Posta will not rectify the data, only restrict them until the accuracy of the data has been checked.

### **10.2. Request to erase data**

Data subjects may request that their data be erased.

For data processing based on the data subject's consent, Magyar Posta Zrt. will regard a request for erasure as the withdrawal of consent and thus will erase the personal data. Data will not be erased if processing of the data is required

- for the performance of a contract to which the data subject is a party or in order to take action requested by the data subject prior to entering into the contract, or
- for compliance with a legal obligation or the performance of a task carried out in the public interest, or
- to protect the vital interests of the data subject or others, or
- for the purposes of the legitimate interests pursued by Magyar Posta Zrt. or a third party.

#### 10.3. Request to restrict processing

Data subjects may request Magyar Posta to restrict the processing of their data. In this case Magyar Posta will not use the data subject's data, only store them. Magyar Posta will restrict the processing of a data subject's data if the data subject

- contests the accuracy of the data processed by Magyar Posta Zrt. but the accuracy of the data subject's data still needs to be verified,
- opposes the erasure of the data by Magyar Posta Zrt. and asks for them to be kept,
- requests Magyar Posta to keep his or her data in order to exercise a legal claim (e.g. to bring legal action) using them.

Magyar Posta will inform data subjects of the lifting of the restriction in advance.

#### 10.4. Request for data portability

Data subjects may request Magyar Posta to issue in an electronic format the data given by the data subject to Magyar Posta and processed in an IT system in order to be able to transfer them to another data controller.

In response to the request, Magyar Posta Zrt. issues the data in .xml or .csv format, depending on the functionality of the data processing system.

If the data subject requests Magyar Posta to transfer his or her data directly to another data controller, Magyar Posta will examine whether or not it has a suitable data connection which allows the safe and lawful transmission of the data and, provided it does, it will transfer the data directly.

### **11. WHERE CAN YOU TURN TO PROTECT YOUR RIGHTS?**

If you think that the way Magyar Posta Zrt. processes your personal data infringes your rights, we suggest you first contact Magyar Posta Zrt. with your complaint. Your complaint will be investigated in every case and we will do our utmost to address it. You can submit your complaint concerning personal data using the contact details set out in point 6.

If, despite having made a complaint, you continue to find that the way Magyar Posta processes your data is injurious, or you do not wish to make a complaint but wish to turn to the authorities directly, you can make a report to the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, address: 1055 Budapest, Falk Miksa utca 9-11, postal address: 1363 Budapest, Pf. 9, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.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>.