Privacy Notice
on data processing related to the use of the iCsekk application

Magyar Posta Zrt., as the operator of the iCsekk application, is committed to protecting the data of users of the iCsekk application and to providing them with appropriate information about the processing of their personal data.

In the iCsekk application, the data subjects can use the services of not only Magyar Posta Zrt. but also Díjnet Zrt., thus this notice covers all data management which the use of the iCsekk application involves.

Through the iCsekk application, the user can access the following payment services:
- Magyar Posta Zrt.'s bill payment (yellow form) and postal bill payment (white form) services, by scanning a QR code,
- Díjnet Zrt.'s payment or deferred payment service initiated by presenting a bill letter, by scanning the QR code, and
- Díjnet Zrt.'s mobile balance top-up service

In view of the fact that, when using the iCsekk application as a single platform for the payment or deferred payment service provided by Díjnet Zrt. initiated by presenting a bill letter and scanning the QR code or the mobile balance top-up service, the different phases, purposes and methods of data processing are so interdependent that – from the aspect of the results for the data subjects, such as the payment and mobile balance top-up – they rely on each other in the course of processing, Díjnet Zrt. and Magyar Posta Zrt. are joint data controllers as regards this data processing. Information on joint data management as controllers is provided in Chapter 2 of the Notice.

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1. Data processing by Magyar Posta Zrt.

1.1. Data controller

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)
Contact details of Magyar Posta Zrt.'s data protection officer: adatvedelem@posta.hu

1.2. Data processing related to downloading and registering in the iCsekk application and the use of the Application

1.2.1. On what grounds is Magyar Posta entitled to process the data?

By downloading the iCsekk application and registration, the user enters into a contract with Magyar Posta whereby Magyar Posta Zrt. ensures the use of the iCsekk application under the agreed conditions for the user and grants the right of use for this. Data processing is therefore necessary for the performance of the contract between the data subject and Magyar Posta. [General Data Protection Regulation (EU) 2016/679, Article 6(1)(b)]

1.2.2. What type of data does Magyar Posta process?

Data	Why?
e-mail address	for registration, confirmation of registration, user identification
password	for registration, checking access by authorised user
time of acceptance of the General Terms and Conditions and Privacy Notice	establishing and recording the conclusion of the contract with the user and the data processing relationship
type of mobile device	to ensure the operability of the application
type of operating system	to ensure the operability of the application
user log data generated while using the system (the fact, date and time of downloading, logging in, payment, attempted payment, rejection)	− to provide the services used, − to examine service-related events and user activities
data on the time and duration of the use of the service	to establish the expiry of registration without confirmation, the termination of the service and the duration of data processing

1.2.3. For what purposes are the data processed?

Magyar Posta processes the data
- to identify the user registered for the iCsekk application and to verify his/her authorisation,
- to identify and register the person authorised to use the iCsekk application,
- to operate the iCsekk application,
- to provide the technical conditions for data subjects to use the services available through the iCsekk application,

- to keep records of the data subject's activities for and make relevant data available to the data subject in accordance with the functionality of the iCsekk application, such as the management of paid and pending bills,
- fulfilling the conditions of service of the iCsekk application, taking steps related to the termination or discontinuation of the contract, such as contacting the registered user and providing information.

1.2.4. How long does Magyar Posta process the data for?

Magyar Posta Zrt. processes the data of unconfirmed registrations for 24 hours after registration and then erases the data. The data of confirmed registrations are processed until the user is deleted, but no later than 5 years after the last attempted payment transaction.

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 will process the data for the period necessary for the establishment, exercise or defence of the legal claims.

1.2.5. Who do we transfer your data to? (Who are the recipients of your data?)

Data processor: Díjbeszedő Informatikai Kft. (registered office: 1117 Budapest, Budafoki út 107-109, company registration number: 01-09-173831, e-mail: dbrt@dbrt.hu)

Its activities:
- providing and operating the IT infrastructure for the operation of the iCsekk application,
- forwarding customer requests and feedback sent to the e-mail address info@icsekk.hu to the customer service of Magyar Posta Zrt. or Díjnet Zrt., taking into account the subject of the requests.

Díjbeszedő Informatikai Kft. uses as further data processors Remedios Zrt. (registered office: 1063 Budapest, Bajnok u. 13, company registration number: 01 10 046850, tax number: 23037490-2-42, website: https://www.remedios.hu/ e-mail: info@remedios.hu) and Inter-Computer-Informatika Zrt. (registered office: 1118 Budapest, Gombocz Zoltán utca 12. fszt. 1, company registration number: 01 10 044769, tax number: 12857074-2-43, website: http://intercomputer.hu/, e-mail: info@intercomputer.hu) for operating the system.

Magyar Posta Zrt. transfers data about bank card payment transactions to OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság (registered office: 1143 Budapest, Hungária körút 17-19, company registration number: 01 09 174466, tax number: 24386106-2-42; the company's address for service: benyo.peter@otpmobil.hu, https://simplepay.hu/adatkezelesi-tajekoztatok/) for the purposes of carrying out the assessment of the transaction necessary for strong customer authentication and the transaction risk analysis to establish exemption, forwarding to the financial institutions performing authorisation tasks [OTP Bank Nyrt. (1051 Budapest, Nádor u. 16) and Borgun hf. Ármúli 30, 108 Reykjavik, Iceland)], the performance of the payment transaction authorisation by the financial institutions carrying out the authorisation, fraud monitoring and fraud prevention (transaction risk analysis), and arranging the bank card acceptance and the transaction risk analysis by the card issuing bank. This is necessary for the assertion of the legally recognised legitimate interest of the payment service providers affected by the bank card transactions in order to comply with the rules of strong customer authentication while ensuring the security of the payers' transactions and the

profitable operation of the services available on the online channel. [General Data Protection Regulation, Article 6(1)(f)]

This legitimate interest is founded on

- − Act LXXXV of 2009 on the provision of payment services, Section 55/C, which creates an obligation to perform strong customer authentication; and
- − Commission Delegated Regulation (EU) 2018/389 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards for strong customer authentication and common and secure open standards of communication, which, inter alia, regulates the risk analysis of transactions.

1.2.6. 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. Apart from the employees of the data processor and further data processors performing the operational tasks, Magyar Posta's employees involved in providing the services available through the iCsekk application (the product managers and service developers of online channels), as well as staff monitoring the performance of the service, and investigating and handling customer complaints may have access to personal 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.

1.2.7. Submission and processing of data subject requests

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, Magyar Posta Zrt. may charge a fee for fulfilling their request or may refuse the request.

Magyar Posta Zrt. informs data subjects that, if they indicate in their request for erasure, correction or restriction of data processing their wish for Díjnet 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.

Requests about rights concerning personal data may be submitted at any time using the following means of contact:

- − 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,
- − 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

1.3. Magyar Posta's bill payment (yellow form) and postal bill payment (white form) services

The processing of personal data in the provision of Magyar Posta Zrt.'s **bill payment (yellow form) and postal bill payment (white form) services** is necessary for the performance of a task in the public interest because Magyar Posta Zrt., as the universal postal service provider, is obligated by the legislator to provide the

- bill payment ("yellow form"),
- postal bill payment ("white form")

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

Information on data processing can be found under "Privacy Notice" on Magyar Posta's website (https://www.posta.hu/adatkezelesi_tajekoztato).

1.4. Customer requests, feedback, complaint handling

Magyar Posta's processing of personal data for the purposes of handling **customer requests, feedback and complaints** related to the functioning of the iCsekk application is necessary to assert the legitimate interests of Magyar Posta, which is demonstrated by the fact that without the processing of such data customer requests could not be investigated, answers could not be given to data subjects and it would be impossible to process the observations of data subjects. This would infringe not only the interests of the data subject but also the legitimate economic interests of Magyar Posta Zrt. as this would lead to customer complaints, and it is Magyar Posta's socially recognised interest to protect and increase its good reputation and retain the satisfaction of its customers. [General Data Protection Regulation, Article 6(1)(f)]

Information on data processing can be found under "Privacy Notice" on Magyar Posta's website (https://www.posta.hu/adatkezelesi_tajekoztato).

2. Joint data management of Díjnet Zrt. and Magyar Posta Zrt. as controllers

2.1. Data controller

Díjnet Zrt. (registered office: 1117 Budapest, Budafoki út 107-109, company registration number: 01-10-045817, e-mail: info@dijnet.hu, website: www.dijnet.hu), as the service provider

Data protection officer's contact details: gdpr@dijnet.hu

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), as the operator of the iCsekk application, the joint platform

Magyar Posta Zrt.'s data protection officer's contact details: adatvedelem@posta.hu

2.2. On what grounds are Díjnet Zrt. and Magyar Posta entitled to process the data?

As regards the services of **Díjnet Zrt.**, the processing of data is necessary for the performance of the contract concluded between the customer and Díjnet Zrt. [General Data Protection Regulation (EU) 2016/679, Article 6(1)(b)]

In view of the fact that, when using the iCsekk application as a single platform for the payment or deferred payment service initiated by presenting a bill letter and scanning the QR code or the mobile balance top-up service, the different phases, purposes and methods of data processing are so interdependent that – from the aspect of the results for the data subjects, such as the payment and mobile balance top-up – they rely on each other in the course of processing, Díjnet Zrt. and Magyar Posta Zrt. are joint data controllers as regards this data processing.

Magyar Posta Zrt. processes the data based on the common legitimate interest of Díjnet Zrt. and Magyar Posta Zrt. to enable data subjects to access the services of Díjnet Zrt. on their mobile devices via the iCsekk application, thereby preserving and increasing in the future the number of registered customers of Magyar Posta Zrt.'s iCsekk application and the range of users of Díjnet Zrt.'s services providing the basis of its economic results and thus the effectiveness of the business operation. [General Data Protection Regulation (EU) 2016/679, Article 6(1)(f)]

The processing of personal data for the purposes of handling **customer requests, feedback and complaints** related to the Díjnet services available through the iCsekk application (payment or deferred payment initiated by presenting a bill letter and mobile balance top-up) is necessary to assert the legitimate interests of Díjnet Zrt., which is demonstrated by the fact that without the processing of such data customer requests could not be investigated, answers could not be given to data subjects and it would be impossible to process the observations of data subjects. This would infringe not only the interests of the data subject but also the legitimate economic interests of Díjnet Zrt. as this would lead to customer complaints, and it is Díjnet Zrt.'s socially recognised interest to protect and increase its good reputation and retain the satisfaction of its customers. [General Data Protection Regulation, Article 6(1)(f)]

2.3. What type of data do Díjnet Zrt. and Magyar Posta Zrt. process?

2.3.1. Mobile balance top-up service

Data	Why?
Phone number	to identify the phone to be topped up and to carry out the top-up
Mobile service provider	to identify the service provider of the phone to be topped up and to carry out the top-up
Top-up amount	to initiate the crediting of the top-up, to determine the amount to be paid

2.3.2. Payment or deferred payment service by presenting a bill letter

Data	Why?
Beneficiary's name and address	− to make the payment − to identify the entitled person
Beneficiary's bank account number	− to make the payment − to identify the entitled person

Amount paid	to make the payment
Bill identification number	to identify the bill paid
Date and time of payment	− as proof of payment − to track payment
Place of payment (online channel identifier)	− as proof of payment − to track payment
Payment ID number	− to identify the payment − as proof of payment − to track payment
E-mail address	− for notification related to payment, − to contact the data subject (customer requests, complaints)
Authorisation code	to approve the payment transaction
SimplePay ID number	− to identify the payment − as proof of payment − to track payment
Transaction ID number	− to identify the payment − as proof of payment − to track payment
the data entered for "Name given to card issuing bank"	− to make the payment − to identify the person making the payment
the data entered for "Address given to card issuing bank": country, postcode, city, county, street name and house number	− to make the payment − to identify the person making the payment
the data entered for "Phone number given to card issuing bank"	− to make the payment − to contact the payer
Log-in name and password given in the Díjnet system	to connect the Díjnet account to the iCsekk application
Issuer of bill	− to identify the bill to be paid − to display details of the bill to be paid
Date of bill	− to identify the bill to be paid − to display details of the bill to be paid
due date of bill, payment deadline	− to set up advance notification − to display details of the bill to be paid
bill identification number	− to identify the bill to be paid − to display details of the bill to be paid
quantity of the service consumed	to display details of the bill to be paid
place of consumption and use ID number	to display details of the bill to be paid
place of consumption	to display details of the bill to be paid
user name	to display details of the bill to be paid
user address	to display details of the bill to be paid
contractual current account number	to display details of the bill to be paid

2.4. For what purposes are the data processed?

Purpose of data processing
  − to provide the services of Díjnet through the iCsekk application, such as receiving, paying and accounting payments, mobile top-up orders, and bank card payments, and

− receiving, handling and responding to customer requests and complaints regarding the services

2.5. How long do the data controllers process the data for?

Transaction data necessary to provide the bill payment service and the mobile top-up service provided by Díjnet Zrt. are processed for 5 years from the date of the transaction.

Data related to requests from data subjects and customers are processed by Díjnet Zrt. for five (5) years from the date the request is submitted.

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

2.6. Who do we transfer your data to? (Who are the recipients of your data?)

Data processor: a Díjbeszedő Informatikai Kft. (registered office: 1117 Budapest, Budafoki út 107-109, company registration number: 01-09-173831; e-mail: dbrt@dbrt.hu)

Activity:
− providing and operating the IT infrastructure for the operation of the iCsekk application,
− forwarding customer requests and feedback sent to the e-mail address info@icsekk.hu to the customer service of Magyar Posta Zrt. or Díjnet Zrt., taking into account the subject of the requests.

Díjbeszedő Informatikai Kft. uses as further data processors Remedios Zrt. (registered office: 1063 Budapest, Bajnok u. 13, company registration number: 01 10 046850, tax number: 23037490-2-42, website: https://www.remedios.hu/ e-mail: info@remedios.hu) and Inter-Computer-Informatika Zrt. (registered office: 1118 Budapest, Gombocz Zoltán utca 12. fszt. 1, company registration number: 01 10 044769, tax number: 12857074-2-43, website: http://intercomputer.hu/, e-mail: info@intercomputer.hu) for operating the system.

Data about bank card payment transactions are transferred to OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság (registered office: 1143 Budapest, Hungária körút 17-19, company registration number: 01 09 174466, tax number: 24386106-2-42; the company's address for service: benyo.peter@otpmobil.hu, https://simplepay.hu/adatkezelesi-tajekoztatok/) for the purposes of carrying out the assessment of the transaction necessary for strong customer authentication and the transaction risk analysis to establish exemption, forwarding to the financial institutions performing authorisation tasks [OTP Bank Nyrt. (1051 Budapest, Nádor u. 16) and Borgun hf. Ármúli 30, 108 Reykjavik, Iceland)], the performance of the payment transaction authorisation by the financial institutions carrying out the authorisation, fraud monitoring and fraud prevention (transaction risk analysis), and arranging the bank card acceptance and the transaction risk analysis by the card issuing bank. This is necessary for the assertion of the legally recognised legitimate interest of the payment service providers affected by the bank card transactions in order to comply with the rules of strong customer authentication while ensuring the security of the payers' transactions and the profitable operation of the services available on the online channel. [General Data Protection Regulation, Article 6(1)(f)]

This legitimate interest is founded on

− Act LXXXV of 2009 on the provision of payment services, Section 55/C, which creates an obligation to perform strong customer authentication; and

– Commission Delegated Regulation (EU) 2018/389 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards for strong customer authentication and common and secure open standards of communication, which, inter alia, regulates the risk analysis of transactions.

2.7. Submission and processing of data subject requests

In view of the fact that the payment or deferred payment service initiated by presenting a bill letter or the mobile balance top-up service via the iCsekk application is a service of Díjnet Zrt., requests concerning data should be submitted to Díjnet Zrt. If the request is submitted to Magyar Posta Zrt., it will be forwarded by Magyar Posta to Díjnet Zrt.

Díjnet Zrt. will respond to the data subject's request without undue delay, but no later than 1 month from the date of submission of the request. If the request is very complex or a large number of requests are submitted, Díjnet 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 Díjnet Zrt. is unable to fulfil the data subject's request, it 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, Díjnet Zrt. may charge a fee for fulfilling their request or may refuse the request.

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

Requests concerning rights related to personal data may be communicated using the contact details below at any time:
- by post: 1117 Budapest, Budafoki út 107-109
- by e-mail to gdpr@dijnet.hu

3. What rights do you have?

a. Request for access (information):

Data subjects may request information at any time regarding whether the Data Controller(s) is/are processing their data, and if so, they may be granted access to these.
In the absence of an exact requirement in the data subjects' request of what in particular they are interested in with regard to their data being processed, in addition to their data, we will provide information about the following:
- what type of data do(es) the Data Controller(s) process?
- where these were obtained from (source of the data),
- for what purpose do(es) the Data Controller(s) process the data (purpose of data processing),
- the grounds entitling the Data Controller(s) to process the data (the legal basis),
- from when until when the Data Controller(s) process the data (duration),
- the persons the Data Controller(s) has/have disclosed or will disclose the data to,

− what rights the data subjects have in relation to processing their data

b. Request to rectify (change) data

Data subjects may request that their data be rectified. If the data subject's data that the Data Controller(s) process(es) 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 the Data Controller(s) assess whether the new data are true and, if they are, whether the old data can be amended.

If it is unclear whether the data processed are correct or accurate, the Data Controller(s) will not rectify the data, only restrict them until the correctness of the data has been checked.

If records about the data subject are incomplete, at the data subject's request, the data will be supplemented provided that such data are required for use.

c. Request to erase data

Data subjects may request that their data be erased.
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
− to exercise the legitimate interests pursued by the Data Controller(s) or a third party.

If the data subject requested the erasure of data whose processing is based on the legitimate interest of the Data Controller(s) or a third party [General Data Protection Regulation, Article 6(1)(f)], the Data Controller(s) will regard such a request for erasure as an objection to the processing. If the objection is well-founded (i.e. there is no reason why the data must be processed), the Data Controller(s) will erase the data.

If data processing is required in order to perform a contract or take action at the data subject's request prior to entering into the contract, or to comply with a legal obligation or for the protection of the vital interests (e.g. life) of the data subject or a third party, regardless of the request for erasure, the Data Controller(s) will only erase the data if the personal data are no longer required.

In other cases, the Data Controller(s) will erase the data if it is established that they have been processed unlawfully, or a Hungarian or European Union legal obligation stipulates their erasure.

The Data Controller(s) cannot erase data which must be processed by the Data Controller(s) as a legal obligation or due to a public duty or based on public interest in the field of public health (e.g. the prevention of an epidemic situation). Data that are processed for scientific research, archiving or statistical purposes, or are required for the establishment, exercise or defence of legal claims must also be kept.

d. Request to restrict processing

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

− contests the accuracy of the data processed by the Data Controller(s) but the accuracy of the data subject's data still needs to be verified,

- opposes the erasure of the data by the Data Controller(s) and asks for them to be kept,
- requests the Data Controller(s) to keep his or her data in order to exercise a legal claim (e.g. to bring legal action) using them,
- objected to the processing of the data and it still needs to be examined whether the data subject's objection is well-grounded.

The Data Controller(s) will inform data subjects of the lifting of the restriction in advance.

e. **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, the Data Controller(s) will stop processing the data and will erase the data.

The data subject may object if the data processing is based on the legitimate interest of the Data Controller(s) or a third party [General Data Protection Regulation, Article 6(1)(f)].

If data processing is required in order to perform a contract or take action at the data subject's request prior to entering into the contract, or to comply with a legal obligation or for the protection of the vital interests (e.g. life) of the data subject or a third party, regardless of the objection, the Data Controller(s) will only erase the data if the personal data are no longer required.

The Data Controller(s) cannot erase data which must be processed by the Data Controller(s) as a legal obligation or due to a public duty or based on public interest in the field of public health (an epidemic situation) or that are necessary for the establishment, exercise or defence of legal claims.

4. Where can you turn to protect your rights?

If you think that the way the Data Controller(s) process(es) your personal data infringes your rights, you should first make a complaint using the contact details given in points 1.2.7 and 2.7. 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 find that the way the Data Controller(s) process(es) 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, website: 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.