

Privacy Notice

Providing visitor access to the MOL Campus using the TDS visitor management service

Effective: 6 April 2023

Name and purpose of the processing	Legal basis for processing	Scope and source of the data processed	Duration of processing	Data transfers to third parties	Data processing and related activities
<p>Providing visitor access to the MOL Campus Visitor Center and SkyDeck by using the Linistry visitor management service.</p> <p>Customers purchasing ticket for visiting the SkyDeck, receive a QR code in the confirmation e-mail entitling for a one-time visit. Once the visitor arrives to the MOL Campus Visitor Center, she/he can use the QR code to pass through the security gate in the Visitor Center, which leads to the elevator to the SkyDeck.</p> <p>Data on the visit can also help to manage any incidents. For example to investigate</p>	<p>Section 6 (1) f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by MOL Campus Kft. and MOL Nyrt. (collectively "MOL"). The legitimate interest is: to ensure faster and more efficient access for persons not performing duties at MOL Campus.</p> <p>If the individual provides MOL with special categories of personal data in connection with her or his visit (e.g. health data), the processing is further subject to the explicit consent of the visitor pursuant to</p>	<ul style="list-style-type: none"> • Full name • Email address • Visitor ID (this is the unique reference number generated by MOL and included in the QR code). • Start and end of visit • Footage from the security camera system on the MOL Campus. The related privacy notice is available here: https:// 	<p>MOL will delete the data related to the visit within one month after the visit unless the data is necessary for the purpose of a possible legal claim.</p> <p>In this case, the time limits set out under the processing purpose "<i>Enforcement of legal claims by the individuals or MOL</i>" shall apply.</p> <p>MOL makes anonymised statistics from the personal data</p>	<p>No personal data is transferred to a third party data controller.</p>	<p>MOL IT & Digital GBS Kft. - operation of IT systems and provision of IT services.</p> <p>Linistry Zrt. - operating the visitor management software.</p> <p>MOL Campus Kft. - checking visitors and their identity documents, ensuring that the MOL</p>

<p>example, to investigate a breach of the rules on visits or to evacuate the building in the event of an emergency.</p> <p>Visitors can receive email notifications about their visit. Examples of such notifications include confirmation of the visit and the booked timeslot.</p> <p>If the visitor does not wish to use the Ministry visitor management service, she/he will not have the possibility to enter the SkyDeck, only the area of the Visitor Center is available for visit.</p>	<p>visitor pursuant to Article 9 (2) a) of the GDPR. If the visitor provides special categories of personal data on the web interface, MOL will consider that the visitor has consented to the processing of the data.</p> <p>Consent may be withdrawn at any time, but this does not affect the lawfulness of the previous processing, and MOL cannot fulfil the visitor's specific requests without the special categories of personal data.</p>	<p>mol.hu/hu/adatvedelem</p> <p>Upon entry, MOL will also check that the visitor's identity document (e.g. ID card, driving licence, passport, student card, etc.) does indeed contain the visitor's name and photograph and that the document is still valid and based on the date of birth included in it, visitor is entitled to use discounted tickets. MOL does not store this data.</p>	<p>from the personal data to assess the utilisation of SkyDeck .</p> <p>If the visitor fails to appear within the time limit set in advance by MOL, her/his access right will be terminated; in case of violation of the access rules, MOL is entitled to terminate the access right temporarily or permanently.</p>		<p>that the MOL Campus Visitor Center and SkyDeck is in order, assisting with visitor processes, assisting with access in the event of a Ministry service interruption, for example by manual data entry.</p>
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Prevention, detection and investigation of possible abuses related to the visit.

The MOL Group Code of Ethics and Business Conduct, Business Partner Code of Ethics, Ethics Council Code of Conduct ("Code of Ethics"), which can be found at <https://mol.hu/hu/molrol/etika-es-megfeleles/etika/>, are the guiding documents for the prevention and investigation of potential misconduct.

For more information on the Ethics Board's data processing activities, please see the link below:

<https://molgroup.info/en/speak-up>

The related privacy notice is available here:

https://molgroup.info/storage/documents/sustainability/mol_etikai_bejelentes_adatkezelesi_tajekoztato.pdf

<p>Enforcement of legal claims by the individuals or MOL.</p> <p>This may include, for example, the handling of disputes that visitors may have initiated in relation to damage to the MOL Campus Visitor Center and SkyDeck and its facilities, or the handling of complaints about the access (or suspension of access) of individuals.</p>	<p>Article 6(1)(f) GDPR (processing is necessary for the purposes of the legitimate interests pursued by MOL).</p> <p>MOL's legitimate interest: enforcement of legal rights by MOL, to assist the individual in enforcing the legal rights by providing personal data, and to successfully defend any legal or administrative proceedings that the individual may initiate.</p>	<p>All the data specified in the previous purposes of data processing, in particular the range of data necessary for the exercise of legal claims or the defence of a particular case (including typically the name of the individual, the identification of the time of her or his visit and data relating to a claim against or by her or him).</p> <p>Data source: depending on the circumstances of the case, the relevant person, a third party or MOL.</p>	<p>MOL will process the data until the preparation of any legal action and the actual enforcement of the claim.</p> <p>If official proceedings or legal proceedings are instituted in the course of enforcing a legal claim, MOL will process the personal data until the final conclusion of the proceedings.</p> <p>The official documents generated will be kept by MOL in accordance with the rules on the preservation of the document.</p>	<p>If the investigation in relation to the legal claims concerns another MOL Group member and that company actually pursues a legal claim as a result of the investigation, the Legal departments of that company and MOL's legal department will have access to the data.</p>	<p>MOL IT & Digital GBS Kft. - operation of IT systems and provision of IT services</p>
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The data controller and the data processors: the privacy notice and the legitimate interest assessments (also known as legitimate interest balancing tests) are available at the access points and at <https://mol.hu/hu/adatvedelem>, and MOL will also make them available to the individuals upon their request.

The name, registered seat, telephone number, website (where the privacy notice is available) and e-mail address of the data controller and other possible contact details:

MOL Nyrt. (registered seat: HU-1117 Budapest, Dombóvári út 28., telephone number: +36-1-886-5000, website: www.mol.hu, e-mail address: ugyfelszolgalat@mol.hu)

MOL Campus Kft. (registered seat: 1117 Budapest, Dombóvári út 28., telephone number: +36-1-886-5000, website: www.molcampus.hu, e-mail address: campusvisitorcenter@mol.hu)

The data controllers are considered as joint controllers. In practice, it means that they jointly determine the purposes and means of the processing. The essence of the joint controllership agreement shall be made available to the individuals. Irrespective of the terms of the joint controllership agreement, individuals may exercise their rights under the GDPR in respect of and against each of the data controllers. The data controllers have a joint privacy notice.

MOL Campus Kft. determines the visiting policy (e.g. the time at which visitors can be received), thus the conditions of the data processing, and prepares the privacy notice.

MOL Campus Kft. has signed a contract with Linistry Zrt.

Contact person(s) of the data controllers

MOL Nyrt. - e-mail: ugyfelszolgalat@mol.hu

MOL Campus Kft. - e-mail: campusvisitorcenter@mol.hu

Name and contact details of the Data Protection Officer(s) at the data controllers:

MOL Nyrt. - e-mail: dpo@mol.hu

MOL Campus Kft. - e-mail: dpo@mol.hu

The following people have the right to access data at the data controllers:

MOL Nyrt. – employee in MOL Campus, Reception service admin, personal assistant, security admin

Names, registered seat, telephone numbers, websites and e-mail addresses of the data processors and other data recipients:

MOL IT & Digital GBS Kft. – registered seat: 1117 Budapest Dombóvári út 28., e-mail address: itu@mol.hu

Linistry Zrt. – registered seat: 2234 Maglód, Gábor Áron utca 38., tel: +36(70)249-9060, web: <https://landing.linistry.com/hu>; email: info@linistry.com

MOL Biztonsági Szolgáltatások Kft. - registered seat: 1117 Budapest, Dombóvári út 28., telephone number: 36-1-886-5000, e-mail address: ugyfelszolgalat@mol.hu

Where MOL Nyrt. uses service providers acting as data processors, it will ensure that appropriate data processing agreements are in place in accordance with Article 28 of the GDPR. The purpose of such agreements is, inter alia, to ensure that the processing of personal data is carried out by the data processor on behalf of MOL Nyrt. and solely on the basis of instructions given by MOL Nyrt.

Processing of special personal data(s) for the purposes set out in this Privacy Notice: the individual may provide MOL with special categories of personal data (e.g. health data) in connection with her or his visit.

Data transfers to third countries: There will be no data transfers to third countries.

The fact of automated decision-making, including profiling, and, at least in these cases, the logic used and clear information on the significance of such processing and the likely consequences for the individual: Upon entry, MOL check that the visitor's identity document (e.g. ID card, driving licence, passport, student card, etc.) does indeed contain the visitor's name and photograph and that the document is still valid and based on the date of birth included in it, visitor is entitled to use discounted tickets. MOL does not store this data.

Data security measures:

Information security management system	Ensure the confidentiality, integrity and availability of organisational information by implementing policies, processes, process descriptions, organisational structures, software and hardware functions.
Physical access	Ensuring the protection of physical assets that contain data relating to the MOL Group.
Logical access	Ensuring that only approved and authorised users have access to data used by MOL Group companies.
Data access	Ensuring that only persons authorised to use the systems have access to MOL Group corporate data.
Data transmission / storage / destruction	To ensure that MOL Group company data cannot be transmitted, read, modified or deleted by unauthorised persons during transmission or storage. In addition, ensure the immediate deletion of MOL Group Corporate Data when the purpose of the processing ceases.

Confidentiality and integrity	To ensure that when processing MOL Group corporate data, the data is kept confidential and up to date and to preserve its integrity.
Contact	To ensure that MOL Group corporate data is protected against accidental destruction or loss and, in the event of an incident that causes such consequences, to provide timely access to and recovery of the affected MOL Group corporate data.
Data separation	Ensuring that data of MOL Group companies is treated separately from data of other customers.
Incident management	In the event of any breach of MOL Group corporate data, the impact of the breach should be minimised and the owners of MOL Group corporate data should be notified immediately.
Audit	Ensuring that the data controller regularly tests, reviews and evaluates the effectiveness of the technical and organisational measures outlined above.

Your rights regarding the data processing:

Your data protection rights and remedies and their limitations are set out in detail in the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You may at any time request information about, access to, rectification, erasure or restriction of the processing of your data and object to processing based on legitimate interests. The following is a summary of the main provisions concerning your data protection rights and remedies.

In particular, MOL draws your attention to the following in the information it provides: **you have the right to object to the processing of your personal data by MOL on grounds relating to your particular situation. In this case, MOL may no longer process the personal data, unless MOL can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. In practice, this means that if the visitor does not want to use the TDS visitor management service, she/he must discuss and organize the visit directly with the person who invited her/him.** In addition, in relation to personal data processed for the purposes of the legitimate interests pursued by MOL or a third party, the data subject has the right to request the so-called “legitimate interest assessment” (also known as legitimate interest balancing tests) under Article 6(1)(f) of the GDPR, which sets out in detail why the interests of MOL and the third party override your interests, rights and freedoms in the specific processing operation, and how and to what extent they are limited.

Right to information:

Where MOL processes personal data relating to you, MOL is obliged to provide you with information, even without your request, on the main features of the processing, such as the purpose, legal basis, duration of the processing, the identity and contact details of MOL and its representative, the contact details of the Data Protection Officer, the recipients of the personal data (including, in the case of transfers to third countries, information on the existence of a European Commission decision), in the case of processing based on legitimate interests, the legitimate interests of MOL and/or third parties and your rights and remedies with regard to the processing (including the right to lodge a complaint with a supervisory authority), if you do not provide the data, the source of the personal data and the categories of personal data concerned, if you do not have this information. MOL will provide this information by sending this notice to you.

Right of access:

You have the right to receive feedback from MOL on whether your personal data are being processed and, if such processing is taking place, the right to access your personal data and certain information about the processing, including the purposes of the processing, the categories of personal data concerned, the recipients of the personal data, the (envisaged) duration of the processing, the rights and remedies of the data subject (including the right to lodge a complaint with a supervisory authority) and, if the data do not originate from you, information about their source.

Upon your request, MOL will provide you with a copy of the personal data that is the subject of the processing. For additional copies requested by the data subject, MOL may charge a reasonable fee based on administrative costs. If the data subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the data subject requests otherwise. The right to request a copy must not adversely affect the rights and freedoms of others.

Users can see their visit data on the web interface accessible when accepting the invitation.

MOL will provide you with information about the possibility of obtaining a copy, how to do so, the possible costs and other details at your request.

Right to rectification:

You have the right to have inaccurate personal data concerning you corrected by MOL without undue delay upon your request. Taking into account the purpose of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

Right to erasure:

You have the right to request MOL to delete personal data concerning you without undue delay, and MOL is obliged to delete personal data concerning you without undue delay if certain conditions are met. MOL is obliged to delete your personal data at your request, inter alia, if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; if you withdraw your consent on which the processing is based and there is no other legal basis for the processing; if the personal data have been unlawfully processed; if you object to the processing and there is no overriding legitimate ground for the processing; or if the personal data must be deleted in order to comply with a legal obligation under Union or Member State law applicable to MOL.

The above does not apply if:

- processing is necessary for the exercise of the right to freedom of expression and information;
- the processing is necessary for compliance with an obligation under Union or Member State law that requires the processing of personal data that is applicable to MOL;
- the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where the right of erasure would be likely to render such processing impossible or seriously jeopardise it;
- processing is necessary for the establishment, exercise or defence of legal claims.

The right to restriction of processing:

You have the right to have MOL restrict the processing of your data at your request if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction applies for the period of time that allows the controller to verify the accuracy of the personal data;
- the processing is unlawful and you object to the deletion of the data and instead request the restriction of their use;
- MOL no longer needs the personal data for the purposes of processing, but you require it for the establishment, exercise or defence of legal claims; or
- You have objected to the processing; in this case, the restriction applies for the period until it is determined whether MOL's legitimate grounds prevail over your legitimate grounds.

If processing is restricted on the basis of the above, such personal data, except for storage, may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

If you have requested that the processing of your data be restricted, MOL will inform you in advance if the restriction is lifted.

Right to object:

As already stated above, you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data on the basis of MOL's legitimate interest. In such a case, MOL may no longer process the personal data unless MOL can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Framework for the exercise of rights

MOL will inform you without undue delay, and in any event within one month of receipt of the request, of the action taken in response to the request concerning your rights listed above. If necessary, and taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. MOL will inform you of the extension, stating the reasons for the delay, within one month of receipt of the request. If you have submitted your request electronically, the information will be provided electronically where possible, unless you request otherwise.

The above information shall be provided to MOL in writing or by other means, including, where applicable, by electronic means. Oral information may be provided at your request, provided that you have otherwise verified your identity.

Without prejudice to other administrative or legal remedies, you have the right to file a complaint with an authority - in particular the responsibility based on your habitual judicial residence, place of work or suspected infringement - if, in your opinion, the processing of your personal data violates the GDPR its provisions. The contact details of supervisory authorities within the EU can be found here: https://edpb.europa.eu/about-edpb/about-edpb/members_en. In Hungary, the competent supervisory authority is the National Data Protection and Freedom of Information Authority ("NAIH"). The contact details of the NAIH (address: 1055 Budapest Falk Miksa u. 9-11., postal address: 1363 Budapest, Pf.: 9., tel: +36 1 391 1400, fax: +36-1-391-1410, email: ugyfelszolgalat@naih.hu, website: <http://naih.hu/>).

Without prejudice to any administrative or non-judicial remedies available to you, including the right to lodge a complaint with a supervisory authority, you have the right to an effective judicial remedy if you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in a way that does not comply with the GDPR. Proceedings against MOL or its controller or processor partner must be brought before the courts of the Member State in which MOL or the controller or processor is established. Such proceedings may also be brought before the courts of the Member State where you are habitually resident.

In Hungary, such proceedings fall within the jurisdiction of the courts. For information on the jurisdiction and contact details of the courts, please visit the following website: <https://birosag.hu/en>