

Privacy Notice

This Privacy Notice has been prepared in line with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter as: GDPR), with due consideration of the provisions of Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter as: Information Act).

Name and contact details of the Data Controller:

Name / Company name:	HUPX Zrt. (hereinafter as “HUPX Zrt.” or “Data Controller”)
Registered seat:	1134 Budapest, Dévai utca 26-28.
Tax no.:	13967808-2-41
Company registration number:	01-10-045666
Name / address of the website:	www.hupx.hu
Availability of the Privacy Notice:	on the Data Controller’s website
E-mail:	info@hupx.hu
Phone:	06-1-304-1090

The Data Controller takes care to protect personal data, comply with mandatory legal provisions, and process data in a secure and fair manner in the course of its business and economic activities. HUPX Zrt. processes personal data in line with this Privacy Notice and the provisions of its Privacy Policy, and it takes all security, technical, and organisational measures to guarantee the security of data and compliance with provisions on data protection and data security.

The Data Controller considers it important to respect and enforce the rights of its partners, members, employees, and all natural person data subjects (hereinafter: Data Subject) pertaining to the processing of their data.

In the course of handling, recording, processing and transmitting the personal data of a Data Subject, the Data Controller proceeds in full compliance with the relevant provisions of the GDPR and the Information Act, as well as other pieces of applicable legislation.

1. Data processing principles

The Data Controller represents that it processes personal data in full compliance with this Privacy Notice and it complies with relevant statutory provisions, with special regard to the followings:

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

Personal data may be collected for specified, clear, and lawful purposes only.

The purpose of processing personal data shall be appropriate and relevant, and the processing shall not exceed the scope needed achieve that purpose.

The personal data shall be accurate and up-to-date. The Data Controller shall delete inaccurate personal data without delay, provided that it has credible information on their inaccuracy.

Personal data shall be stored in a form that allows for the identification of the Data Subjects for the necessary period only. Personal data may be stored for a longer period, if such data are stored for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Personal data shall be processed by the Data Controller in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Data Controller shall apply the principles of data protection to any information concerning any identified or identifiable natural person.

2. Important information on data processing

The legal basis of processing: the consent of the Data Subject and compliance with a legal obligation to which the Data Controller is subject. The Data Subjects include employees of the Data Controller, natural persons acting for and on behalf of its members and other contracted partners, and visitors of the website.

The period of data processing and the deletion of data: The period of data processing is always subject to the intended purpose, but the Data Controller deletes the data without delay if the original purpose has been achieved.

The Data Subject may withdraw his or her consent to the processing by sending an email to the contact email address. If deletion is permitted by law, the data will be deleted.

The data may be accessed by the Data Controller and the processors engaged by the Controller.

3. Rights of Data Subjects:

The Data Subject has the right to request from the Data Controller **access** to and **rectification** or **erasure** of personal data or **restriction of processing** concerning the data subject or to **object** to processing as well as the right to data portability.

Where processing is based on the consent of the Data Subject only, the consent to processing **may be withdrawn** at any time, but such withdrawal shall not affect the legality of processing carried out on the basis of consent prior to its withdrawal. If the data processing

The Data Subject has the **right to lodge a complaint** with a supervisory authority.

The Data Subject is **not obliged to provide personal data** and may not be subject to any detrimental consequence if he or she does not provide personal data.

The Data Subject has the **right to obtain from the Data Controller** without undue delay the **rectification or supplementation** of inaccurate personal data concerning him or her.

The Data Subject has the **right to obtain from the Data Controller** the **erasure** of inaccurate personal data concerning him or her without undue delay and the Data Controller has the obligation to erase personal data without undue delay where the processing does not have any other legal basis.

The modification or erasure of personal data may be requested via email or a letter sent to one of the above contact points.

4. Rights concerning data processing

Right to request information: the Data Subject may request information from us at the provided contact points concerning the personal data we process regarding him or her, the legal basis and purpose of processing, the source of the data, and the period of processing. We provide the requested data without delay but no later than 15 days.

Right to rectification: the Data Subject may request the rectification of his or her data by contacting us through the provided contact points. We arrange for the rectification without delay, but no later than 15 days, and send a notice to the provided email address.

Right to erasure: the Data Subject may request the erasure of his or her data by contacting us through the provided contact points. If possible, we erase the data without delay, but no later than 15 days, and send a notice to the provided email address.

Right to blocking: the Data Subject may request the blocking of his or her data by contacting us through the provided contact points. The data shall be blocked as long as necessitated by the reasons stated. We comply with the request without delay, but no later than 15 days, and send a notice to the provided email address.

Right to object: the Data Subject may object to the processing of his or her data by contacting us through the provided contact points. The objection is reviewed and a decision is made regarding the objection as soon as possible, but no later than 15 days, and the Data Subject is notified via email about the decision.

The enforcement of rights concerning data processing

If you suspect that your data are processed in an unlawful manner, help us restore the legality of the situation by notifying us. We will take all measures to resolve the detected problem. If you believe that the legality of the situation cannot be restored, inform the following authority at the following contact point:

Hungarian National Authority for Data Protection and Freedom of Information
Postal address: 1515 Budapest, Pf.: 5.
Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c
Phone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
E-mail: ugyfelszolgalat@naih.hu

5. The range of processed personal data, and the purpose, legal basis, and period of processing

The detailed description of the following data processing activities and a detailed list and description of the personal data processed is provided in the chapter on the registration of data processing activities forming part of the currently effective Privacy Policy of HUPX Zrt. The detailed description of data processing activities is recorded and described in the register by the following characteristics:

- what is the purpose of processing?
- what is the legal basis of processing?
- who are the data subjects (see: what are the categories of data subjects),
- which personal data are processed (see: the categories of personal data processed)
- time-limit for erasing data,
- the form of storing data, and the location of data storage.

5.1 Data processing concerning employment (employment relationship)

- data collected and processed through job applications,
- data collected and processed through the establishment of employment relationships,
- data processed during the period of employment (amendments to employment contracts),
- data processed in the course of termination of employment,
- processing of data relating to medical fitness,
- verification of fit-for-work conditions,
- decision-making on accidents at work,
- data processing for performance assessment,

- processing of other data in relation to employment: processing data of persons working under a mandate relationship, and processing data in relation to student work and traineeship,
- processing data in relation to on-boarding and headcount purposes.

5.2 Data processing concerning members and contracted partners:

- processing data for contact and communications purposes, client relations management, identification
- data pertaining to the operation of video surveillance / operation of a video surveillance system,
- processing data through sound recording
- processing data in relation to *ad hoc* visitors (visitors authorized to enter on an *ad hoc* basis),
- data processing in relation to cashdesk payments, banking transactions, vouchers, invoices.

5.3 Data processing in relation to the HUPX Zrt. website:

➤ **Cookies**

What is a cookie A cookie is a file containing various letters and numbers sent by a webserver and recorded and stored for a pre-determined period on the user's computer. Cookies allow our webserver to recognize the device you use to browse our website and your browsing history on our site. Cookies help us understand the habits and history of a user concerning the use of our website and the Internet in general. Cookies do not contain any data that could identify the visitors of the website, they are simply used to recognize the computer of a user.

Acceptance by visiting the website: When you visit our website, it collects data using cookies as explained above. When visiting our website, you as user may consent with a single click of the mouse to the use of cookies (which are not suitable for identifying any person) by the site in line with the notice.

As a user, you may delete or ban the use of cookies in the settings of your browser at any time.

If you delete or ban the acceptance of cookies in your browser, you limit the usability of the website (or some parts of the website), and the settings you provided earlier on the website may be lost.

Cookies used on our website:

Indispensable cookies: cookies controlling pop-up windows

Functional cookies: language cookie

Google Analytics cookies: yes

Social media: facebook, linkedin

The Data Subjects include visitors of the website.

The purpose of data processing is extra services, identification, visitor tracking.

Legal basis of processing. User consent is not required where the use of cookies is indispensable for the service provider.

Scope of data: unique identifier, date and time, settings.

Data Controllers entitled to access the data. The Data Controller does not process any personal data through the use of cookies.

Means of storage: electronic.

➤ **Google Analytics**

Our website uses Google Analytics. Google Analytics uses cookies to produce reports to its clients regarding user habits on a website.

As required by the website operator, Google uses this information to assess how users use a website. As an additional service, it also produces reports to website operators regarding website activity, with a view to enabling the operator to provide additional services.

Data is stored on Google's servers in an encoded format in order to prevent abuses concerning such data.

You can block Google Analytics as follows¹. *"Web site visitors who do not want Google Analytics JavaScript reporting their visit can install the Google Analytics opt-out browser extension. This plugin forbids Google Analytics JavaScript (ga.js, analytics.js, and dc.js) to send visiting information to Google Analytics. The browser extension is available for most newer browsers. The Google Analytics Disabling Browser Extension does not prevent the data being sent to the site itself and other Internet analytics services."*

Further information on the use and protection of data is available at the following links:
<https://policies.google.com/privacy?hl=hu> and
https://static.googleusercontent.com/media/www.google.com/en//intl/ru/policies/privacy/google_privacy_policy_hu.pdf

6. Data processors (persons with access to data, the transmission and processing of data)

Data Processors may not make decisions independently, and they shall act in compliance with their contract concluded with and the instructions received from the **Data Controller**. Data Processor record, manage, and **process personal** data transmitted to them by the **Data Controller** in line with the provisions of the GDPR.

The Data Processors may access and process personal data provided by the Data Subjects during the period specified in the Privacy Policy with regard to the individual purposes of data processing.

¹Quote from this page: <https://support.google.com/analytics/answer/6004245?hl=hu>

The **Data Controller** transmits data to the following companies and uses the following data processors.

Name and availability of Data Processors	Activity	Data processing operation
HUDEX Magyar Derivatív Energiatőzsde Zártkörűen Működő Részvénytársaság 1134 Bp., Dévai utca 26-28.	hosting server services operation of IT systems	recording, storage, sorting, querying, use, erasure
Karádi Rendszerház Informatikai Kft. 4400 Nyíregyháza, Dózsa György út . 1 st floor	Provision of document and process servers	storage
EPEX Spot SE, 5 boulevard Montmartre, 75002 Paris, France	provision of trading systems and market operation – operator activities	recording, storage, sorting, querying, use, erasure
Gas Management Services Limited Clarendon House, Clarendon Road, Cambridge, CB2 8FH	part-time market operation – operator activities	recording, storage, sorting, querying, use, erasure
Deutsche Börse AG 60485 Frankfurt am Main Deutschland	provision of trading systems	storage
BDO Magyarország Könyvelő és Bérszámfejtő Kft. 1103 Budapest, Kőér utca 2/a	accounting and payroll services concerning employees	recording, storage, sorting, querying, use, erasure
Invitech Megoldások Zrt., 2040 Budaörs, Edison utca 4.	Operation of a publication website (insideinformation.hu)	storage

The processed personal data may be accessed primarily by the Data Controller and the internal staff of the Data Controller; such data are not published or disclosed to any third party other than the data processors or other cooperating third-party service providers. With regard to operating the services and settling accounts, the Data Controller may use a data processor and may cooperate with third-party service providers.

7. The method and security of data processing

The Data Controller ensures the security of data, and it takes technical and organisational measures and implements procedural rules that are needed to enforce the provisions laid down in the Information Act and other rules relating to the protection of data and secrets. The Data Controller protects personal data against unauthorized access, unauthorized modification; unauthorized transmission; unauthorized publication; unauthorized or

accidental erasure and destruction; damages; becoming inaccessible due to changes in applied technologies.

The Data Controller strives to protect data files processed by electronic means in various registers, with a view to ensuring that data stored in different registers cannot be interconnected directly and associated with the Data Subject, unless permitted by law.

The Data Controller stores the personal data it processes on storage devices (both live and backup) located in data centres operated by its IT infrastructure provider. Entering such data centres is subject to prior permission and requires adequate identification. The computer rooms in data centres are fitted with fire alarm and automated fire extinguishing systems. Identification for entering is performed by human guards. Devices located in data centres may be accessed by pre-approved personnel only. Remote access to systems and stored data is secured by two-step encrypted authentication. Data security is also maintained by regular backups.

In the course of processing personal data by automated means, the Data Controller ensures

- the prevention of unauthorised data input;
- the prevention of unauthorized use of the systems;
- that potential or actual organisations that have received or may receive personal data using a transmission device can be verified and identified;
- the controllability and traceability of personal data input into the automated data processing systems (which data were entered, by whom and when);
- the recoverability of the installed systems in the event of system failure.

The Data Controller keeps a record of transmissions that can be used to verify the legality of any data transmission that may occur. Such records include the range of personal data transmitted, the date and time and legal basis of the transmission, the recipient of the data, and other data required by law.

If any data is lost due to the fault of the Data Controller, the Data Controller is to restore the data free of charge.

8. Miscellaneous provisions, entry into force

The Data Controller publishes on its website (<http://www.hupx.hu>) and may modify the current Privacy Notice unilaterally at any time.

Place and date: 5 July 2018

Effective: As of 5 July 2018

HUPX Zrt.

Annex 1:

The legal background of data processing

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- Act CXII of 2011 on Informational Self-determination and Freedom of Information.
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services.
- Act C of 2003 on Electronic Communications.



Annex 2:

Definitions

- the **GDPR** (General Data Protection Regulation) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC;
- **processing**: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **processor**: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller;
- **personal data**: means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **Data Controller**: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the Data Controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **consent of the data subject**: means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- **personal data breach**: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- **recipient**: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the

processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

- **third party:** a natural or legal person, public authority, agency or body other than the data subject, Data Controller, processor and persons who, under the direct authority of the Data Controller or processor, are authorised to process personal data;

