

PRIVACY STATEMENT



8 July 2016

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Magyar Posta Zrt. (hereinafter referred to as “Magyar Posta”) is committed to protecting the data of data subjects who contact Magyar Posta and to duly informing them about the processing of their personal data.

This information on data processing explains

- the grounds entitling Magyar Posta to process data (the 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),
- whether data processors are involved,
- 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 dependent on the purpose the data subject gave the data for. A large organisation 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 every time they arrange a specific postal affair or use a postal service, in this document **the relevant information for each service or area used is provided under separate headings** to make it easier for customers to find out which data are processed on each occasion.

We wish to inform data subjects that advice about specific data processing carried out by Magyar Posta is given 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 in the list of data processings recorded in the data processing register accessible on the website www.posta.hu.

We believe it is important to point out to persons providing data to Magyar Posta (data suppliers) that, if data suppliers supply personal data other than their own, they are obliged to obtain the consent of the data subject.

1. Data controller

Magyar Posta is the data controller with regard to all data processing described in this document.

Contact us:

- by post: Ügyfélszolgálati Igazgatóság (Customer Service Directorate), 3512 Miskolc,
- by fax: (+36) 46-320-136,
- by e-mail: ugyfelszolgalat@posta.hu,
- by phone: (+36) 1-767-8282 giving your name and address,
- in person: Magyar Posta Zrt., Budapest, District X, Üllői út 114-116.

This privacy statement is available online on the website www.posta.hu under Privacy Statement in the menu.

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

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

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

- the consent of data subjects which is evident in that they give their own personal data to Magyar Posta or to the sender in order to be sent something by post (Act CXII of 2011 on the right of informational self-determination and on freedom of information (hereinafter referred to as the “Info Act”), Section 5(1)(a))

and

- 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

- Act CLIX of 2012 on postal services (hereinafter referred to as the “Postal Services Act”)

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

- Government Decree 335/2012 of 4 December 2012 on the detailed rules for the provision of postal services and the 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 referred to as the “Gov. Dec.”)
- the Universal Postal Public Service Contract.

Magyar Posta 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 for this 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. For this reason, Section 54(4) of the Postal Services Act, unlike the provisions of the Information Act, permits the transfer of personal data necessary to perform postal services irrespective of whether or not an adequate level of protection is provided for the transferred personal data during data processing in the third country.

2.2. What data do we process?

data	Why?
sender’s and addressee’s names (Gov. Dec., Sections 4 and 7)	<ul style="list-style-type: none"> – to deliver mail – when an agreed delivery time is arranged, we process the addressee’s name also for the purpose of recording the delivery time.
sender’s and addressee’s addresses (Gov. Dec., Sections 4 and 7)	<ul style="list-style-type: none"> – to deliver mail – when an agreed delivery time is arranged, we process the addressee’s address also for the purpose of recording the delivery time.

number of the recipient's identity document (Postal Services Act, Section 41(10))	to prove the identity of the person receiving the item delivered in person
type of the recipient's identity document (Postal Services Act, Section 41(10))	to prove the identity of the person receiving the item delivered 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 of registered 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 (Gov. Dec., Section 25)	to inform the sender
entitlement to receive mail (Gov. Dec., Section 22(5))	to record the recipient's entitlement to receive mail
if authorised by the addressee: "mh" mark	to record the recipient's entitlement to receive mail
for an alternative or occasional recipient, data concerning the relationship between the recipient and the addressee	to record the recipient's entitlement to receive mail
spouse, lineal relative; adoptive, step or foster child; adoptive, step or foster parent; 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 mail
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", "accommodation provider"	to record the recipient's entitlement to receive mail

employee not authorised to represent an organisation, as an occasional recipient (Gov. Dec., Section 15(4)), in this capacity: “employee”	to record the recipient’s entitlement to receive mail
neighbour, as an occasional recipient (Gov. Dec., Section 16(4)), in this capacity: “neighbour”	to record the recipient’s entitlement to receive mail
adult witness in this capacity: “witness” (Gov. Dec., Section 26(1))	to record the recipient’s entitlement to receive mail

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 an item is unavoidable. These are if:

- a. the contents of an item pose a threat (for example, it contains an explosive, flammable or infectious substance) which must be eliminated
- b. the packaging of an item is damaged to the extent that it is necessary to repack to prevent damage to the contents or other mail items
- c. an item cannot be returned to the sender for some reason and
 - the contents of the 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 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 items include postcards and picture postcards.

Under the legislation affecting companies engaged in economic activities at airports (NAVSEC programme, Regulation (EC) 300/2008, Commission Regulation (EU) 2015/1998, Government Decree 169/2010 of 11 May 2010), and thus Magyar Posta as well, in the case of transport by air the contents of export (outbound) mail are subject to aviation security controls. 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. Why are the data processed?

- 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 at a PO Box services, a notification of the delivery of an 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 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 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 in secret or to obtain confidential data. The specific conditions under which this may happen are laid down in Government Decree 9/2005 of 19 January 2005 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 data for?

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 2015, Magyar

Posta would process the data related to its dispatch and delivery until 31 December 2016. However, the sender may request that we process the data related to him or her for longer, as may the addressee.

2.5. Do we involve 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 applying the rules laid down by Magyar Posta. Accordingly, postal contractors are Magyar Posta's data processors. A list of postal contractors is available on our website www.posta.hu.

International mail 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 referred to as the "IPC") (Belgium 1130 Brussels, Avenue du Bourget 44, cape.helpdesk@ipc.be, <https://www.ipc.be>) and the Universal Postal Union (POB 312 3000 BERNE 15 Switzerland, ptc.support@upu.int, 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 manages personal data allowing access only to those who need them to carry out the service you require. Thus staff involved in forwarding mail (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'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. 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.

Our company is under a legal obligation (Postal Services Act, Section 53) to supply data upon request to and to allow access to data by the National Media and Infocommunications Authority, the courts, the Hungarian National Authority for Data Protection and Freedom of Information, and other organisations authorised by law. 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 9/2005 of 19 January 2005)

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 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 item) and to the postal operator in the transit country (the country to which the 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 payment service provider

Magyar Posta comes into contact with its customers not only as a postal service provider but also as a provider of payment services governed by certain rules applicable to this area. Data subjects can pay the two types of bill payment forms (“yellow” and “white” forms) at post offices, or using our iCsekk application or the bill payment terminals operated by Magyar Posta, and domestic postal money orders (“pink” postal orders) 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 grounds is Magyar Posta entitled to process data?

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

- the consent of the data subjects which is evident in that they give their personal data
 - to Magyar Posta (for example, when paying a yellow bill payment form), or
 - to another person to make payment for them at Magyar Posta following their instructions (for example, a wife paying her husband’s phone bill made out in his name on the yellow payment form), or
 - to the sender so that the sender can send money to the data subject using Magyar Posta’s services (for example, giving his or her name and address to the sender of a pink domestic postal order)

and

- Act LXXXV of 2009 on the provision of payment services (hereinafter referred to as the “Payment Act”).

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

- Decree 18/2009 of 6 August 2009 of the Governor of the National Bank of Hungary on payment services activities (hereinafter referred to as the “Payment Dec.”)
- Government Decree 335/2012 of 4 December 2012 on the detailed rules for the provision of postal services and the 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 referred to as the “Gov. Dec.”)

These regulations provide the framework for sending money to the payee using the bill payment form (yellow form), the postal bill payment form (white form), the domestic postal money order (pink form), 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 (EC) No 1781/2006 of 15 November 2006 on information on the payer accompanying transfers of funds (hereinafter referred to as “(EC) 1781/2006”)¹

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 transmitted 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 CXXXVI of 2007 on the prevention and combating of money laundering and terrorist financing (hereinafter referred to as the “AML Act”)

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.

¹ From 26 June 2017 replaced by Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006

- Act CXXXIX of 2013 on the Magyar Nemzeti Bank (hereinafter referred to as the “MNB Act”), Section 24

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

- MNB Decree 11/2011 of 6 September 2011 on the processing and distribution of banknotes and on technical tasks relating to the protection of banknotes against counterfeiting, Sections 14 to 16 and Annex 4
- MNB Decree 12/2011 of 6 September 2011 on the processing and distribution of coins and on technical tasks relating to the protection of coins against counterfeiting, Sections 6 to 8 and Annex 2

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 referred to as the “Accounting Act”)

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

3.2. What data do we process?

3.2.1. Bill payment form (yellow) or postal bill payment form (white)

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

data	Why?
payer’s name and address (Payment Act, Section 49; Payment Dec., Section 43; (EC) 1781/2006, Article 4; AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to make the payment – 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
payee’s name (Payment Dec., Section 43) and address	<ul style="list-style-type: none"> – to make the payment – to identify the person authorised

payee's bank account number (Payment Dec., Section 43)	to make the payment
information in the notes section marked by the service providers or payers (Payment Dec., Section 43)	to communicate information considered important by the payee and/or the payer (not compulsory)
amount (Payment Act, Payment Dec.)	to make the payment
payer's identifier (the identification used by the service providers and marked on the payment form) (Payment Dec., Section 43)	reference identifying the payer for the payee (not compulsory)
date of bill (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"> – as proof of payment, – to track payment
place of payment (name of PO, number of terminal, iCsekk application)	<ul style="list-style-type: none"> – as proof of payment, – to track payment
identification number of payment ((EC) 1781/2006)	to identify payment and trace it back to the payer
nationality (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
place and date of birth (AML Act, Section 7)	to prevent money laundering and terrorist financing
mother's name (AML Act, Section 7)	to prevent money laundering and terrorist financing
type of identity document (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
the letters of the alphanumerical code of the document proving identity (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
the number from the alphanumerical code of the document proving identity (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
document type – residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing

the letters of the alphanumerical code of the residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
the number of the alphanumerical code of the residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing

3.2.2. Domestic postal money order (pink form)

When using our domestic bill payment service (pink form), we may ask for the data below or link this information to the payments.

data	Why?
name and address of payee (Payment Dec., Section 47; Gov. Dec., Section 4)	<ul style="list-style-type: none"> – to make the payment – to identify the person authorised
name and address of payer (Payment Act, Section 49; (EC) 1781/2006, Article 4; AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – 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.)	to make the payment
due date	the payer's information about the date of the outpayment in order to inform the payee
date and time of payment (Payment Act, Section 10)	<ul style="list-style-type: none"> – as proof of payment, – to track payment
place of payment (name of PO)	<ul style="list-style-type: none"> – as proof of payment, – to track payment
telephone 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
signature of witness (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
nationality (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
date and place of birth (AML Act, Section 7)	to prevent money laundering and terrorist financing

mother's name (AML Act, Section 7)	to prevent money laundering and terrorist financing
type of identity document (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prove the identity of the recipient – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
type of identity document (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prove the identity of the recipient – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
the number from the alphanumerical code of the document proving identity (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prove the identity of the recipient – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
type of document – residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
the letters of the alphanumerical code of the residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
the number of the alphanumerical code of the residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
codes for reasons for returning mail (Gov. Dec., Section 25)	to inform the payer
legible name	to prove receipt
if the recipient is authorised by the payee: "mh" mark	to record the recipient's entitlement to receive
for an alternative recipient, data concerning the relationship between the payee 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;	to record the recipient's entitlement to receive
the landlord of the property at the address or the person providing accommodation to the recipient provided they are natural persons: "landlord", "accommodation	to record the recipient's entitlement to receive

	provider”	
	adult witness in this capacity: “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?
payee’s name (Payment Dec., Section 46; Gov. Dec., Section 4)	– to provide the service – to identify the person authorised
payer’s name and address (Payment Dec., Section 46; Gov. Dec., Section 7)	– to identify the payer – for the posting list acting as an accounting document
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 payee (not compulsory)
payee’s identifier	not compulsory; its purpose is to communicate information to the payee (e.g. reference number, contract number, etc.)
amount (Payment Act; Payment Dec.)	to make the payment
date and time of payment (Payment Act, Section 10)	– as proof of payment, – to track payment
payer’s bank account number	to identify the payment service provider and the payer
payee’s bank account number	if the payee requests payment to be made to a bank account
signature	as proof of the availability of the funds for payment and as proof of the receipt of the money
signature of witness	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	to prove the identity of the recipient
the letters of the alphanumeric code of the identity document	to prove the identity of the recipient
number of the identity document	to prove the identity of the recipient
if the recipient is authorised by the payee: “mh” mark	to record the recipient’s entitlement to receive
for an alternative recipient, data concerning the relationship between the payee and the	to record the recipient’s entitlement to receive

recipient		
	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 recipient provided they are natural persons: "landlord", "accommodation provider"	to record the recipient's entitlement to receive
	adult witness in this capacity: "witness"	to record the recipient's entitlement to receive

3.2.4. Pension order

Magyar Posta 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:

data	Why?
payee's name and address (Payment Dec., Section 46; 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 payee (not compulsory)
payee's identifier	not compulsory; its purpose is to communicate information to the payee (e.g. reference number, contract number, etc.)
amount (Payment Act; Payment Dec.)	to make the payment
due date	payer's information for the payee as to which month's pension is being paid out
payee's bank account number	to provide the service if the payee requests payment to be made to a bank account

signature	<ul style="list-style-type: none"> – as proof of the availability of the funds for payment and – as proof of the receipt of the money
signature of witness	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	to prove the identity of the recipient
the letters of the alphanumeric code of the identity document	to prove the identity of the recipient
number of the identity document	to prove the identity of the recipient
if the recipient is authorised by the payee: “mh” mark	to record the recipient’s entitlement to receive
for an alternative recipient, data concerning the relationship between the payee and the recipient	to record the recipient’s entitlement to receive
<div style="background-color: black; width: 100px; height: 100px; display: inline-block; vertical-align: middle;"></div> 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
<div style="background-color: black; width: 100px; height: 100px; display: inline-block; vertical-align: middle;"></div> adult witness in this capacity: “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
telephone/fax number	to contact the person/company instructing payment
bank account number	to identify the person/company instructing payment
signature (Payment Dec., Section 45(4))	<ul style="list-style-type: none"> – as proof of the account holder’s declaration related to payment – as proof of receipt of the amount
amount (Payment Dec., Section 45(3))	to specify the amount payable
name of the natural person authorised to withdraw cash (Payment Dec., Section 45(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 45(3))	to identify the person entitled to withdraw the money
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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 under the MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2.

data	Why?
name (MNB Act, Section 24, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to identify the person changing coins or paying in coins if counting is only done in that person's absence – to identify the person handing over or paying with suspected counterfeit coins
address (MNB Act, Section 24, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to identify the person changing coins or paying in coins if counting is only done in that person's absence – to identify the person handing over or paying with suspected counterfeit coins
type of identity document (MNB Act, Section 24, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to identify the person changing coins or paying in coins if counting is only done in that person's absence – to identify the person handing over or paying with suspected counterfeit coins
the letters of the alphanumeric code of the identity document (MNB Act, Section 24, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to identify the person changing coins or paying in coins if counting is only done in that person's absence – to identify the person handing over or paying with suspected counterfeit coins

number of the identity document (MNB Act, Section 24, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to identify the person changing coins or paying in coins if counting is only done in that person's absence – to identify the person handing over or paying with suspected counterfeit coins
signature	to confirm the undertaking

3.2.7. Payment Data Service (for example, if the receipt of a yellow form 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 payee.

data	Why?
payer's name and address	<ul style="list-style-type: none"> – to identify the person asking for financial data, – to identify the payment, – to send the financial data
the data in the "Payee" box (payee's name and address or account number)	<ul style="list-style-type: none"> – to identify the person asking for financial data, – to identify the payment, – to send the financial data
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. Payment 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 both the person entitled to ask for information and the requested information as accurately as possible, thus the data below are required:

data	Why?
payer's name and address (the payer's address is not required for pension orders)	<ul style="list-style-type: none"> – to identify the person asking for financial information, – to identify the payment, – to send the financial information
the data in the "Payee" box (payee's name and address or account number)	<ul style="list-style-type: none"> – to identify the person asking for financial information, – to identify the payment, – to send the financial information
amount	to identify the payment
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	<ul style="list-style-type: none"> – to identify the person asking for financial information, – to identify the payment
payer's identification number (only for yellow and white forms – if the data subject wishes to give it)	to identify the payment
e-mail address of the person asking for financial information	to communicate the information

3.3. Why are the data processed?

- to perform our payment 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 form the amount of the phone or water bill paid to the service provider and for a pink postal order the amount sent to the payee.

- to handle complaints about the services and claims for compensation,
- to deal with service-related inquiries made to the payment 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 data for?

As regards performing individual payment orders for payment 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.

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 instructing the payment. ((EC) 1781/2006, Article 5)

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 AML unit of tax office, the investigating authority, the public prosecutor's office and the courts, but for a maximum of 10 years. (AML Act, Sections 28 and 28/A)

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 instructing the payment. (MNB Decree 11/2011 of 6 September 2011, 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 bill payment form, 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 involve data processors?

Essentially, Magyar Posta provides its payment 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's data processor 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 application, and transfers the data of yellow and white bill payments 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. Accordingly, postal contractors are Magyar Posta's data processors. A list of postal contractors is available on our website www.posta.hu.

3.6. Who may access the data?

Magyar Posta manages 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. bill payments), 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'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.

The point of the yellow and white bill payment service is that the data subject pays cash into a bank account (payment account). Thus it is an indispensable precondition of providing the service that Magyar Posta transfers the data of the private individual as the payer to the bank where the payee holds the account for yellow bill payment forms and directly to the payee in the case of white bill payment forms so that the payment can be credited to the payee's account and the payee can identify who made the payment. Furthermore, if the amount on a pink postal order or an outpayment order is requested to be paid to the payee's bank account, the data of the payer must 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 Information Office of the Central Office of the National Tax and Customs Administration (Nemzeti Adó- és Vámhivatal Központi Hivatala Pénzmosás Elleni Információs Irodája; Address: 1033 Budapest, Huszti út 42; PO Box: 1300 Budapest, Pf.: 307.) (AML Act, Section (24)) Magyar Posta is also obliged to send such data upon request to the Magyar Nemzeti Bank or the investigating authority, the public

prosecutor's office or the court. So these entities may also access the data. (AML Act, Section 28/A)

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 this to the Magyar Nemzeti Bank's National Counterfeit Centre of the Cash Logistics Directorate (Magyar Nemzeti Bank Készpénzlogisztikai Igazgatóság, Készpénzszakértői és fejlesztési Főosztály; Address: 1054 Budapest, Szabadság tér 9).

Magyar Posta's payment services is supervised by the Magyar Nemzeti Bank (Address: 1054 Budapest, Szabadság tér 9; E-mail: ugyfelszolgalat@mnbn.hu) and Magyar Posta is obliged to provide data if so required by the Magyar Nemzeti Bank (MNB Act, Section 48(4)). The Magyar Nemzeti Bank settles disputes out of court via the Financial Arbitration Board (Pénzügyi Békéltető Testület; Address: 1013 Budapest, Krisztina krt. 39; Postal address: H-1525 Budapest Pf.: 172; Telephone: +36-40-203-776; E-mail: ugyfelszolgalat@mnbn.hu), thus this body may also have access to data in the event of proceedings before the Financial Arbitration Board. (MNB Act, Section 108)

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

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

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

- the consent of the data subject which is evident in that data subjects give their own personal data
 - as the payer to Magyar Posta, or
 - as the payee to the sender, to enable the sender to send money to them,

and

- 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, 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 (EC) No 1781/2006 of 15 November 2006 on information on the payer accompanying transfers of funds (hereinafter referred to as “(EC) 1781/2006”)²

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 CXXXVI of 2007 on the prevention and combating of money laundering and terrorist financing (hereinafter referred to as the “AML Act”)

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.

- Act CXXXIX of 2013 on the Magyar Nemzeti Bank (hereinafter referred to as the “MNB Act”), Section 24

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

- MNB Decree 11/2011 of 6 September 2011 on the processing and distribution of banknotes and on technical tasks relating to the protection of banknotes against counterfeiting, Sections 14 to 16 and Annex 4
- MNB Decree 12/2011 of 6 September 2011 on the processing and distribution of coins and on technical tasks relating to the protection of coins against counterfeiting, Sections 6 to 8 and Annex 2

These rules are intended to detect counterfeiters and to enable Hungary’s central bank, the Magyar Nemzeti Bank, to withdraw counterfeit money.

² From 26 June 2017 replaced by Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006

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 referred to as the “Accounting Act”)

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

4.2. What data do we process?

data	Why?
payee's name and address	<ul style="list-style-type: none"> – to identify the person authorised – to provide the service
payer's name and address ((EC) 1781/2006, Article 4; AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – 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 – to provide the service
date and time of payment	to prove receipt
place and date of dispatch (sending country)	as proof of payment
amount	to make the payment
password	if the payer makes payment conditional on providing a password
signature	to prove receipt
nationality (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
date and place of birth (AML Act, Section 7)	to prevent money laundering and terrorist financing
mother's name (AML Act, Section 7)	to prevent money laundering and terrorist financing
type of identity document (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prove the identity of the recipient with delivery in person – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins

the letters of the alphanumerical code of the document proving identity (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prove the identity of the recipient with delivery in person – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
the number from the alphanumerical code of the document proving identity (AML Act, Sections 7 and 11/A; MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	<ul style="list-style-type: none"> – to prove the identity of the recipient with delivery in person – to prevent money laundering and terrorist financing – to identify the payer with suspected counterfeit banknotes or coins
type of document – residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
the letters of the alphanumerical code of the residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
the number of the alphanumerical code of the residence card (AML Act, Sections 7 and 11/A)	to prevent money laundering and terrorist financing
legible name	to prove receipt
if the recipient is authorised by the payee: “mh” mark	to record the recipient’s entitlement to receive
for payees 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
payee’s bank account number	<ul style="list-style-type: none"> – if the payee requests payment to be made to a bank account – if the payer requests transfer to a bank account

4.3. Why are the data processed?

- to perform our international postal order or express order services, including handling complaints and claims for compensation related to the service, and to deal with service-related inquiries made to the payment information and data service
- 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 data for?

As regards 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.

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 instructing the payment. ((EC) 1781/2006, Article 5)

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 AML unit of tax office, the investigating authority, the public prosecutor's office and the courts, but for a maximum of 10 years. (AML Act, Sections 28 and 28/A)

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 instructing the payment. (MNB Decree 11/2011 of 6 September 2011, 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 involve 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. Accordingly, postal contractors are Magyar Posta's data processors. A list of postal contractors is available on our website www.posta.hu.

4.6. Who may access the data?

Magyar Posta manages 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'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.

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) using accounts held at the Bank.

To transfer money to the payee's country and to make payment to the payee, the payee's data must be transferred to the postal or bank service provider operating in the payee'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 Information Office of the Central Office of the National Tax and Customs Administration (Nemzeti Adó- és Vámhivatal Központi Hivatala Pénzmosás Elleni Információs Irodája; Address: 1033 Budapest, Huszti út 42; PO Box: 1300 Budapest, Pf.: 307). (AML Act, Section 24) Magyar Posta is also obliged to send such data upon request to the Magyar Nemzeti Bank or the investigating authority, the public prosecutor's office or the court. So these entities may also access the data. (AML Act, Section 28/A)

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 this to the Magyar Nemzeti Bank's National Counterfeit Centre of the Cash Logistics Directorate (Magyar Nemzeti Bank Készpénzlogisztikai Igazgatóság, Készpénzszakértői és fejlesztési Főosztály; Address: 1054 Budapest, Szabadság tér 9).

5. Newspaper and magazine subscriptions

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 grounds is Magyar Posta entitled to process data?

- the voluntary consent of the data subjects which is evident in that
 - they provide their personal data for the subscription
(Info Act, Section 5(1)(a))

and

- Act CVIII of 2001 on certain aspects of electronic commerce and information society services (hereinafter referred to as the "E-com Act")

Magyar Posta enables its customers to subscribe 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 details on this see section 11, Webshop.)

- Act C of 2000 on accounting (hereinafter referred to as the “Accounting Act”)

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

5.2. What data do we process?

data	Why?
customer code	to identify the customer in the subscription records system
name	to identify the customer
address	to identify the customer
title of the subscribed newspaper	to send customers the specific newspapers they ordered
telephone number (not compulsory)	to handle complaints related to subscription
e-mail address (not compulsory except if the subscriber has placed an order through the webshop; in this case it is indispensable due to the compulsory confirmation (E-com Act, Section 6(2))	<ul style="list-style-type: none"> – to handle complaints related to subscription – to confirm the subscription – to send notification about the expiry of the subscription
bank account number (not compulsory)	to settle the subscription fee if bank transfer or direct debit is chosen as the means of payment
account holding bank (not compulsory)	to settle the subscription fee if bank transfer or direct debit is chosen as the means of payment
name for delivery (not compulsory if it is identical with the name)	to enable delivery of the subscribed newspaper to the subscriber
address for delivery (not compulsory if it is identical with the address)	to enable delivery of the subscribed newspaper to the subscriber

5.3. Why are the data processed?

Magyar Posta uses the data to provide the service, that is to deliver the subscribed newspapers to the addressee. To do 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 data for?

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 any legal obligation related to the service (e.g. court proceedings), Magyar Posta processes the data while the legal obligation exists. (Info Act, Section 6(5)(a))

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 involve data processors?

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

A current list of other data processors used by Posta Kézbesítő Kft. and approved by Magyar Posta is available on the www.posta.hu website.

5.6. Who may access the data?

The data may be accessed by those 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'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.

As Magyar Posta could not provide the subscription service without the Publishers of newspapers, the Company transfers the data to the Publishers when this is

absolutely necessary to provide the service. In addition to this, Magyar Posta transfers subscribers' data when they have given their explicit consent. In this case the Publishers may also access the subscribers' data.

Many Publishers keep records of their own subscribers so Magyar Posta is obliged to transfer their subscribers' data to them.

With regard to the Publishers' data processing, we provide the following information:

Publisher	Data	Purpose
Nemzet Lap- és Könyvkiadó Kft. (postal address: 1089 Budapest, Üllői út 102, e-mail address: terjesztes@mno.hu)	customer code	<ul style="list-style-type: none"> – to communicate about the subscription – other purpose related to offers for subscribers or customers
	name	
	address	
	telephone number	
	e-mail address	
Magyar Hírlap Kiadói Kft. (postal address: 1145 Budapest, Thököly út 105-107, e-mail address: elofizetes@magyarhirlap.hu)	customer code	<ul style="list-style-type: none"> – to communicate about the subscription – other purpose related to offers for subscribers or customers
	name	
	address	
	telephone number	
	e-mail address	
Napi Gazdaság Kiadó Kft. (postal address: 1033 Budapest, Flórián tér 1, e-mail address: terjesztes@napi.hu)	customer code	<ul style="list-style-type: none"> – to communicate about the subscription – other purpose related to offers for subscribers or customers
	name	
	address	
	telephone number	
	e-mail address	
Artamondo Kft. (postal address: 1062 Budapest, Andrásy út 124, e-mail address: kiado@demokrata.hu)	customer code	<ul style="list-style-type: none"> – to communicate about the subscription – other purpose related to offers for subscribers or customers
	name	
	address	
	telephone number	
	e-mail address	
IQ Press Lapkiadó Kft. (postal address: 1036 Budapest, Lajos u. 74-76, e-mail address: iqterjesztes@iqpress.hu)	customer code	<ul style="list-style-type: none"> – to communicate about the subscription – other purpose related to offers for subscribers or customers
	name	
	address	
	telephone number	
	e-mail address	
Heti Válasz Lap- és Könyvkiadó Szolgáltató Kft. (postal address: 1027 Budapest, Horvát u. 14-24, e-mail address: informacio@hetivalasz.hu)	customer code	<ul style="list-style-type: none"> – to communicate about the subscription – other purpose related to offers for subscribers or customers
	name	
	address	
	telephone number	
	e-mail address	

	delivery address	
Centrál Média csoport Zrt.	customer code	<ul style="list-style-type: none"> – to communicate about the subscription – to make business decisions related to subscription sales of newspapers, – to develop business policy, – for market analysis
	name	
	address	
	telephone number	
	e-mail address	
	delivery address	
Hearts Centrál Kft.	customer code	<ul style="list-style-type: none"> – to communicate about the subscription – to make business decisions related to subscription sales of newspapers, – to develop business policy, – for market analysis
	name	
	address	
	telephone number	
	e-mail address	
	delivery address	

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 would transfer the subscribers' data to the Publisher. Considering that:

- subscribers gave their consent for their data to be processed in order to provide the subscription and
- without transferring the data to the Publisher the service could not be performed, and
- the data will be processed for the same reason as they have been until they were transferred,

the data transfer is proportionate to the protection of the data subjects' personal data. (Info Act, Section 6(5)(b))

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. Stamp orders

One of Magyar Posta's traditional services is issuing and circulating postage stamps. Magyar Posta only processes the data of customers purchasing stamps 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 grounds is Magyar Posta entitled to process data?

- the voluntary consent of the data subjects which is evident in that
 - they provide their personal data when placing an order (Info Act, Section 5(1)(a))

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 referred to as the “Accounting Act”)

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

6.2. What data do we process?

data	Why?
subscriber's name	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	to print on the stamp for the Your Own Stamp service

6.3. Why are the data processed?

Magyar Posta uses the data to perform the order, that is to deliver the ordered stamps to the addressee. To do 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 data for?

Magyar Posta 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 the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt. and the data subject in court within this period.

If data processing becomes necessary due to any legal obligation related to the service (e.g. court proceedings), Magyar Posta processes the data while the legal obligation exists. (Info Act, Section 6(5)(a))

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 involve data processors?

Magyar Posta 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 accepting orders, recording orders (philately sales staff), accounting (accounting staff), produce Your Own Stamps, package and address compiled stamp packages (stamp storage staff), take part in delivering the stamps to the addressees (mail processing and 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'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.

7. Telegram service

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

In the course of its activity of sending and delivering telegrams, Magyar Posta is entitled to process data on the following grounds:

- the consent of the data subject which is evident in that data subjects give their own personal data to Magyar Posta or to the sender to enable the sender to send them a telegram,

and

- Act C of 2003 on electronic communications, Section 125
This law requires that Magyar Posta provide the option of sending telegrams.

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

- Government Decree 236/2004 of 13 August 2004 on the detailed rules of providing the telegram service (hereinafter referred to as the “Telegram Dec.”)

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

7.2. What data do we process?

data	Why?
sender’s and addressee’s names (Telegram Dec., Sections 5(2) and 10(2))	to deliver the telegram
sender’s and addressee’s addresses (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
telephone/fax number (Telegram Dec., Section 15)	to deliver the telegram if the sender requests delivery over the phone or by fax
sender’s signature (Telegram Dec., Sections 5 and 1)	<ul style="list-style-type: none"> – 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 (Postal Services Act, Section 41(10); Telegram Dec., Section 14(2))	to prove the identity of the person receiving the telegram with delivery in person

type of identification document (Postal Services Act, Section 41(10); Telegram Dec., Section 14(2))	to prove the identity of the person receiving the telegram with delivery in person
signature of witness (Gov. Dec., Section 26(1); 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))	to inform the sender
ground for receipt (Telegram Dec., Section 14(2))	to record the recipient's entitlement to receive
if the recipient is authorised by the payee: "mh" mark	to record the recipient's entitlement to receive
for an alternative recipient, data concerning the relationship between the payee 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 (Gov. Dec., Section 16(3)(a); 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 (Gov. Dec., Section 16(3)(b); Telegram Dec., Section 14(2)) "landlord", "accommodation provider"	to record the recipient's entitlement to receive
adult witness in this capacity: "witness" (Gov. Dec., Section 26(1); Telegram Dec., Section 14(2))	to record the recipient's entitlement to receive

7.3. Why are the data processed?

- 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 confirm to senders that their telegram 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 telegrams.

- 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 Telegram Dec., Section 18(2), 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 data for?

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

7.5. Do we involve 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. Accordingly, postal contractors are Magyar Posta's data processors. A list of postal contractors is available on our website www.posta.hu.

7.6. Who may access the data?

Magyar Posta processes telegram data abiding by the confidentiality rules. (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'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.

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 obtain confidential data. 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. Posta Loyalty Card Scheme

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

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

- the consent of the data subject which is evident in that data subjects give their own personal data to Magyar Posta when
 - applying for a Posta Loyalty Card and completing and signing the application form (Info Act, Section 5(1)(a))
 - using the Posta Loyalty Card to collect or redeem points at a post office in the course of using services (Info Act, Section 5(1)(a))
 - indicating that they wish to receive special offers and advertising from Magyar Posta and its contracted partners, and authorise Magyar Posta to process and analyse data for this (Act XLVIII of 2008 on basic requirements and certain restrictions on commercial advertising activities, Section 6(1), and Act CXIX of 1995 on the use of name and address information for the purposes of research and direct marketing)

8.2. What data do we process?

Magyar Posta processes the following personal data under the Posta Loyalty Card scheme:

data	Why?
name	<ul style="list-style-type: none"> – to identify the customer – to issue a card in the individual's name – to identify the insured in the case of group accident insurance
place and date of birth	<ul style="list-style-type: none"> – to identify the customer – to identify the insured in the case of group accident

	insurance
mother's name	<ul style="list-style-type: none"> – to identify the customer – to identify the insured in the case of group accident insurance
nationality	to identify the customer
sex	<ul style="list-style-type: none"> – to develop products – to identify target groups for market research, advertising and offers
address	<ul style="list-style-type: none"> – to identify the customer – to deliver the Posta Loyalty Card – to deliver information about the service, advertisements and offers
postal address	<ul style="list-style-type: none"> – to deliver the Posta Loyalty Card – to contact the insured in the case of group accident insurance – to deliver information about the service, advertisements and offers
e-mail address	to deliver information about the service, advertisements and offers
telephone number	to deliver information about the service, advertisements and offers
transaction data of products purchased and services used	<ul style="list-style-type: none"> – to collect, redeem and account points – to develop products – to identify target groups for market research, advertising and offers
level of education	to identify target groups for market research, advertising and offers
data relating to the composition of household	to identify interest in market research, advertising and offers
services intended to be used in the future, goals	to identify interest in market research, advertising and offers
customer identification number	to identify the customer
signature of customer	to confirm use of service and consent
Posta Loyalty Card number	to identify the Posta Loyalty Card

8.3. Why are the data processed?

- to provide the Posta Loyalty Card service
 - to issue a card in the individual's name,
 - to identify the customer,

The Posta Loyalty Card serves to identify the person using certain services available at the post office and on the Internet. If the data subject registers the Posta Loyalty Card in the 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 Posta Loyalty Card will be recorded in the data subject's account and they can be replaced or deleted except for the most important personal information which is checked by Magyar Posta when meeting in person.

 - to collect and account points,
 - to handle customer requests and complaints about the service,
- to develop products,
- to provide group accident insurance related to the Posta Loyalty Card,
- for market research, marketing and direct marketing, i.e. forwarding information about the offers and advertisements of Magyar Posta and its contracted partners

8.4. How long do we process data for?

Magyar Posta processes the data for the purpose of providing the Posta Loyalty Card service, issuing a card in the individual's name, identifying the customer, collecting and redeeming points, handling customer requests and complaints about the service, developing products and providing group accident insurance related to the Posta Loyalty Card for 5 years after the termination of the Posta Loyalty Card service.

Magyar Posta processes the data for the purpose of market research, marketing and direct marketing, i.e. forwarding information about the offers and advertisements of Magyar Posta and its contracted partners, until the data subject withdraws consent.

8.5. Do we involve data processors?

In the course of using the Posta Loyalty Card service, Magyar Posta uses Magyar Posta Kártyaközpont Zártkörűen Működő Részvénytársaság (Address: 1133 Budapest, Váci út 110. B. ép. 201; Company registration number: 01 10 047918; Tax number: 24748007-2-41) as the data processor, which, as a further data processor, uses Magyar Kártya Szolgáltató Zártkörűen Működő Részvénytársaság (Address: 1082 Budapest, Üllői út 48; Company registration number: 01 10 047947; Tax number: 24778839-2-42) to provide the technical background. Magyar Kártya Zrt.'s further data processor 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 the point collection and accounting.

For data processing conducted for the purpose of market research, marketing and direct marketing, i.e. forwarding information about the offers and advertisements of Magyar Posta and its contracted partners by post, e-mail, telephone or SMS text message, Magyar Posta uses the services of EPDB Nyomtatási Központ Zártkörűen Működő Részvénytársaság (Address: 1117 Budapest, Budafoki út 107-109; Company registration number: 01 10 048079; Tax number: 24924243-2-43) for printing and sending e-mails, and Next Wave Europe Kft. (Address: 1122 Budapest, Csaba utca 24, A. ép.; Company registration number: 01-09-909776; Tax number: 14567339-2-41, www.nextwaveeurope.com, bruno.bitter@nextwave.hu) for sending e-mails.

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 Posta Loyalty 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'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.

In view of the fact that Magyar Posta provides group accident insurance to all Posta Loyalty Card holders, the data are also accessible to the staff of Magyar Posta Biztosító Zrt. (Company registration number: 01-10-044751; Registered office: 1022 Budapest, Bég utca 3-5; Postal address: Posta Biztosító 1535, Budapest, Pf. 952, <https://www.postabiztosito.hu/>, info@mpb.hu) handling group accident insurance. Magyar Posta Zrt. transmits the data of insured persons 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. Bill Checker service

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

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

- the voluntary consent of the data subjects which is evident in that they
 - register with the Bill Checker service and accept its general terms and conditions (Info Act, Section 5(1)(a), and Act CVIII of 2001 on certain aspects of electronic commerce and information society services (hereinafter referred to as the “E-com Act”), Section 13/A)

- use the Posta Loyalty Card to pay “yellow” and “white” bill forms at post offices and decide during this whether or not to make the data of these appear on the Bill Checker interface (Info Act, Section 5(1)(a), and E-com Act, Section 13/A)
- indicate that they wish to receive special offers and advertising from Magyar Posta and its contracted partners, and authorise Magyar Posta to process and analyse data for this (E-com Act, Section 13/A, and Act XLVIII of 2008 on the basic requirements of and certain restrictions on commercial advertising activity, Section 6(1), and Act CXIX of 1995 on the use of name and address information for the purposes of research and direct marketing)

9.2. What data do we process?

data	Why?	
name	to identify the customer using the service	
address	to deliver advertisements (see point 13)	
e-mail address	to deliver advertisements (see point 13)	
telephone number	to deliver advertisements (see point 13)	
date of birth	to deliver advertisements (see point 13)	
IP address	to present advertisements on the interface for the user (see point 13)	
the data of bills paid using the Posta Loyalty Card (yellow and white forms)	to provide the service, i.e. to allow paid bills to be reviewed	
	payer’s name and address	to present payment data
	payee’s name and address	– to present payment data – to automatically categorise the payment
	payee’s bank account number	– to present payment data – to automatically categorise the payment
	information in the notes section marked by service providers or payers	to present payment data
	amount	to present payment data
	payer’s identifier (the identification used by service providers and marked on the payment form)	to present payment data
	date and time of payment	to present payment data
	place of payment	to present payment data

the income, expenditure and spending data of the data subject and their categories	to provide the service, i.e. to review and sort income, spending and expenditure
customer identification number	<ul style="list-style-type: none"> – to identify the customer using the service – to link payments to the customer's electronic account

9.3. Why are the data processed?

- to provide the Bill Checker service
 - to identify the customer registering to use the service,
 - to inform the customer using the Posta Loyalty Card of payments made at post offices, at bill payment terminals and with the iCsekk application,
 - to inform customers of income and expenses they have entered themselves in the Bill Checker system,
 - to enable these data to be sorted, analysed and reviewed according to the criteria entered and recorded in the Bill Checker by the customer using the service,
 - to handle customer requests and complaints about the service.

9.4. How long do we process data for?

Magyar Posta processes the data of the data subject given for registration and identification for five (5) years after using the Bill Checker service because the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt. and the data subject in court within this period.

If data processing becomes necessary due to any legal obligation related to the service (e.g. court proceedings), Magyar Posta processes the data while the legal obligation exists. (Info Act, Section 6(5)(a))

Under the Bill Checker service, Magyar Posta ensures that the image of paid bills can be viewed for 6 months after payment and the data of the bill payments may be requested for 5 years.

If the contract for the Bill Checker service between Magyar Posta and the data subject is cancelled, the data shown in the Bill Checker system will be deleted.

9.5. Do we involve data processors?

If

- the data subject wishes to use the Bill Checker service with Magyar Posta only, i.e. registers on the interface accessible on Magyar Posta's website and wishes to see postal payments and

- does not register with another service provider linked to the Bill Checker service and
- does not interconnect his or her data,

GS3 Service Zártkörűen Működő Részvénytársaság (Registered office: 3526 Miskolc, Arany János tér 1.C lház 2. em. 5; Company registration number: 05-10-000536; Telephone: +3614289066; E-mail: magyarpostazrt@gs3.hu), as Magyar Posta's data processor, performs the technical transactions required to categorise and present the user's data. This means that the data processor uses IT solutions to categorise and present the data on the data subject's own interface where the data subject can delete or change the categorisation of the data at any time.

Magyar Posta transfers the following data to the data processor:

the data of bills paid using the Posta Loyalty Card (yellow and white forms)	
	payer's name and address
	payee's name and address
	payee's bank account number
	information in the notes section marked by service providers or payers
	amount
	payer's identifier (the identification used by service providers and marked on the payment form)
	date and time of payment
	place of payment
customer identification number	

If within the Bill Checker service the data subject

- registers with another service provider linked to the Bill Checker service and
- interconnects his or her data,

GS3 Service Zártkörűen Működő Részvénytársaság (Registered office: 3526 Miskolc, Arany János tér 1.C lház 2. em. 5; Company registration number: 05-10-000536; Telephone: +3614289066; E-mail: magyarpostazrt@gs3.hu) acts as the data controller with regard to the data.

An essential requirement for interconnection is for Magyar Posta to transfer data to GS3 Service Zártkörűen Működő Részvénytársaság, thus the user explicitly consents to this by interconnecting.

The privacy statement of GS3 Service Zártkörűen Működő Részvénytársaság, the receiver of the data, can be accessed on http://gs3.hu/adatkezelesi_tajekoztato/.

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 you require. Staff operating the IT system recording the registration and transferring data to GS3 Zrt., as well as those involved in examining complaints and checking the performance of the service 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.

At GS3 Zrt. the operations performed with the data are totally automated and occur without human intervention. In consequence of this, the employees of GS3 Service Zártkörűen Működő Részvénytársaság (Registered office: 3526 Miskolc, Arany János tér 1.C Iház 2. em. 5; Company registration number: 05-10-000536; Telephone: +3614289066; E-mail: magyarpostazrt@gs3.hu) only access data in specific cases when absolutely necessary to rectify a fault in the IT solutions used.

The processes have been developed to ensure that GS3 Zrt. staff do not have access to the images of yellow and white bill forms that have been paid. These are stored at Magyar Posta and, if an image is requested, this appears only on the interface used by the data subject.

10. MyPost

MyPost is an interface on Magyar Posta's website where the data subject can, after registration, access the services Magyar Posta provides online. The data subject registers once in MyPost and then has to choose which of the services available online after entering he or she wishes to use. The services are arranged in a way which ensures that the data subject can always control the use of data and the purpose of the use of data within the process. This is achieved by deciding whether or not to provide the data, being able to state separately whether or not data may be processed for specific purposes, and having a free choice of which individual service to use or register for from the services available after registering in MyPost.

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

- the voluntary consent of the data subjects which is evident in that
 - they register on the MyPost interface and provide data, and accept the general terms and conditions (Info Act, Section 5(1)(a), and Act CVIII of 2001 on certain aspects of electronic commerce and information society services (hereinafter referred as the "E-com Act"), Section 13/A).

Persons acting as an administrator for an economic operator (company, authority, etc.) may also register on the MyPost interface. The situation may arise here that

someone is made to register by their employer, i.e. they do not give data voluntarily. In this case Magyar Posta receives and processes the data based on the legitimate interests of the employer. The fact that someone is instructed to give their personal data does not exclude providing the service to an economic operator. (Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data)

10.2. What data do we process?

When registering, the customer completes an online form, which Magyar Posta records. The customer receives confirmation of registration by e-mail, which contains a link to click on to activate the registration. Registration requires giving the following data:

data	Why?
name	to identify the customer
user name	to identify the customer
e-mail address	to send confirmation of registration
telephone number	to contact the customer
password	to identify the customer

On the online interface Magyar Posta asks for the data which are needed to use the e-services available there. A few services (at the moment these are checking the point balance and the history of the point account on the Posta Loyalty Card, and the Bill Checker service) may only be used by the customer when a higher level of identification is used. The reason for this is to provide greater protection for customer data processed for these services. Magyar Posta believes that, in order to protect data, it is important that these data are not accessible by simple registration but should only be accessible by someone providing evidence of identity to Magyar Posta. To this end, identification occurs with the aid of the Posta Loyalty Card, thus the data subject may register the Posta Loyalty Card to his or her MyPost account upon registration or at any time thereafter. To do this, two pieces of data are required:

data	Why?
Loyalty Card number	to identify the customer
Month/day of birth	to increase customer safety (if a card gets into the possession of a person other than the holder, the card cannot be used for unauthorised purposes without knowing this information)

10.3. Why are the data processed?

We process data for the purpose of carrying out registration and providing continuous access based on that. In this context the person entering the site is identified by user name and password, and for some services the data of the Posta Loyalty Card, and whether or not they are registered are checked.

10.4. How long do we process data for?

Magyar Posta processes the data of the data subject provided for registration and identification for five (5) years after registration because the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt. and the data subject in court within this period.

If data processing becomes necessary due to any legal obligation related to the service (e.g. court proceedings), Magyar Posta processes the data while the legal obligation exists. (Info Act, Section 6(5)(a))

10.5. Do we involve data processors?

Magyar Posta does not use data processors for registration with MyPost.

10.6. Who may access the data?

Data may be accessed by Magyar Posta's staff who operate the registration process and maintain registrations (deletion, solving entry problems, etc.). Personnel managing complaints related to registration and the services available through this 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'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.

11. 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.

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

- the voluntary consent of the data subjects which is evident in that
 - they provide their personal data when placing an order

- by approving the name, e-mail address and telephone number given on registration, they add the delivery address and/or billing address, or
- they give another name, address, e-mail address and telephone number directly in the webshop (Info Act, Section 5(1)(a))

and

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

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 referred to as the “Accounting Act”)

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

11.2. What data do we process?

data	Why?
name	<ul style="list-style-type: none"> – to identify the customer – to create a contract – to deliver orders – to issue an invoice
e-mail address (E-com Act, Section 6(2))	to send confirmation of the order
telephone number	to contact the customer
delivery address	<ul style="list-style-type: none"> – to deliver orders – to conclude a contract
billing address	to issue an invoice
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

11.3. Why are the data processed?

- to enter into a contract to fulfil the order
A contract is entered into by 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 person placing the order 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

11.4. How long do we process data for?

Magyar Posta processes customer data for five (5) years after registration because the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt. and the data subject in court within this period.

If data processing becomes necessary due to any legal obligation related to the service (e.g. court proceedings), Magyar Posta processes the data while the legal obligation exists. (Info Act, Section 6(5)(a))

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.

11.5. Do we involve data processors?

Magyar Posta does not use data processors.

11.6. Who may access the data?

Magyar Posta's personnel who are involved in recording and billing orders, and packaging, 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'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.

12. 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.

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

- Act CXXXIX of 2013 on the Magyar Nemzeti Bank (hereinafter referred to as the “MNB Act”), Section 24
- Under the cited law, the following documents also include provisions related to data processing:
 - MNB Decree 11/2011 of 6 September 2011 on the processing and distribution of banknotes and on technical tasks relating to the protection of banknotes against counterfeiting, Sections 14 to 16 and Annex 4,
 - MNB Decree 12/2011 of 6 September 2011 on the processing and distribution of coins and on technical tasks relating to the protection of coins against counterfeiting, Sections 6 to 8 and Annex 2,

These legal 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.

12.2. What data do we process?

data	Why?
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	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 identity document (MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	to identify the payer with suspected counterfeit banknotes or coins

the letters of the alphanumerical code of the document proving identity (MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	to identify the payer with suspected counterfeit banknotes or coins
the number from the alphanumerical code of the document proving identity (MNB Act, Section 24; MNB Decree 11/2011 of 6 September 2011, Sections 14 to 16 and Annex 4, and MNB Decree 12/2011 of 6 September 2011, Sections 6 to 8 and Annex 2)	to identify the payer with suspected counterfeit banknotes or coins

12.3. Why are the data processed?

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.

12.4. How long do we process data for?

Magyar Posta must keep the data for 8 weeks from the date of payment. (MNB Decree 11/2011 of 6 September 2011, Section 14(4))

12.5. Do we involve data processors?

Magyar Posta uses MPT Security Zrt. (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.

12.6. Who may access the data?

Magyar Posta's staff who handle the payment 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 by 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 (Magyar Nemzeti Bank Kézpénzlogisztikai Igazgatóság, Kézpénzszakértői és fejlesztési Főosztálya; 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'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.

13. 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 transmit them to the authorities. If the data subject does not give the data, Magyar Posta must refuse to provide the service.

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

- Act CXXXVI of 2007 on the prevention and combating of money laundering and terrorist financing (hereinafter referred to as the "AML Act")

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

13.2. What data do we process?

data	Why?
name and surname (name at birth) (AML Act, Section 7(2)(aa))	for identification required to prevent money laundering and terrorist financing
address (AML Act, Section 7(2)(ab))	for identification required to prevent money laundering and terrorist financing

nationality (AML Act, Section 7(2)(ac))	for identification required to prevent money laundering and terrorist financing
type of identity document (AML Act, Section 7(2)(ad))	for identification required to prevent money laundering and terrorist financing
the letters of the alphanumerical code of the document proving identity (AML Act, Section 7(2)(ad))	for identification required to prevent money laundering and terrorist financing
the number from the alphanumerical code of the document proving identity (AML Act, Section 7(2)(ad))	for identification required to prevent money laundering and terrorist financing
place of stay in Hungary for foreign nationals (AML Act, Section 7(2)(ae))	for identification required to prevent money laundering and terrorist financing
place and date of birth (AML Act, Section 7(3)(aa))	for identification required to prevent money laundering and terrorist financing
mother's name (AML Act, Section 7(3)(ab))	for identification required to prevent money laundering and terrorist financing
politically exposed person status for individuals with foreign domicile (AML Act, Section 16(1)) These are persons who are entrusted or who have been entrusted with prominent public functions within 1 year or have such family members or are close associates of such persons. For example, a politically exposed person is a woman living in Austria whose husband is the Austrian head of state.	for identification required to prevent money laundering and terrorist financing if the data subject is resident abroad
type and subject of transaction (AML Act, Section 11/A)	for analysing payments required to prevent money laundering and terrorist financing, and adding together payments
amount of transaction (AML Act, Sections 6 and 11/A)	for analysing payments required to prevent money laundering and terrorist financing, and adding together payments
duration of the transaction (AML Act, Section 6)	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, 23 and 24)	to report the flow of funds and suspected persons to the tax authority in order to prevent money laundering or terrorist financing

13.3. Why are the data processed?

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

- to identify data subjects using payment services and the international postal order service
- to report to the Anti-money Laundering Information Office of the Central Office of the National Tax and Customs Administration in the event of suspicion
- to examine transactions and payments that are connected
- to monitor the flow of funds in business relations with the data subject

13.4. How long do we process data for?

Magyar Posta is obliged to process data for 8 years. (AML Act, Section 28)

Certain data may have to be kept by Magyar Posta for longer but a maximum of 10 years. This situation arises if the Magyar Nemzeti Bank, the Anti-money Laundering Information 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 to retain the data for a specified period longer than 8 years, which may not be more than 10 years.

13.5. Do we involve data processors?

Magyar Posta does not use data processors for these data.

13.6. Who may access the data?

Magyar Posta requires strict authorisation for allowing access to such data. The data subject's data are accessible to employees accepting the money or sales representatives 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 Information Office of the Central Office of the National Tax and Customs Administration have access to the data. Magyar Posta inspects the fulfilment of measures and tasks in order to prevent money laundering and terrorist financing every year. Thus the data of data subjects are also accessible to employees engaged in such controls (internal auditors, security and protection staff, data protection officers) inasmuch as this is essential to carry out the controls (for example, inspecting the proper completion of identification data sheets).

Magyar Posta is also obliged to send such data upon request to the Magyar Nemzeti Bank, the Anti-money Laundering Information Office of the Central Office of the National Tax and Customs Administration (Nemzeti Adó- és Vámhivatal Központi

Hivatala Pénzmosás Elleni Információs Irodája; Address: 1033 Budapest, Huszti út 42, PO Box: 1300 Budapest, Pf.: 307) or to the investigating authority, the public prosecutor's office or the courts. So these entities may also access the data. (AML Act, Sections 24 and 28/A)

13.7. 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 instituted against him or her. (AML Act, Section 27)

14. Magyar Posta as the carrier

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

14.1. On what grounds 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 grounds:

- the consent of the data subject which is evident in that data subjects give their own personal data to Magyar Posta or to the sender to enable the sender to send them a mail item,

and

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

Magyar Posta, 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 documents necessary for providing the service pursuant to the rules of the cited law.

14.2. What data do we process?

data	Why?
sender's and addressee's names (Civil Code, Sections 6:257 and 6:258)	to deliver mail
sender's and addressee's addresses (Civil Code, Sections 6:257 and 6:258)	to deliver mail

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
sender's signature (Civil Code, Section 6:258)	as proof of dispatch on the consignment note
place and date of receiving the mail item (Civil Code, Section 6:258)	<ul style="list-style-type: none"> – as proof of dispatch on the delivery note – as proof of receipt to the recipient
recipient's signature	to prove receipt
legible name of recipient	to prove receipt 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 (Civil Code, Section 6:264)	to inform the sender in order to obtain instructions
ground for receipt	to record the recipient's entitlement to receive
if the recipient is authorised by the payee: "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	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", "accommodation provider"	to record the recipient's entitlement to receive

	employee not authorised to represent an organisation, as an occasional recipient, in this capacity: “employee”	to record the recipient’s entitlement to receive
	neighbour, as an occasional recipient, in this capacity: “neighbour”	to record the recipient’s entitlement to receive
	adult witness in this capacity: “witness”	to record the recipient’s entitlement to receive

14.3. Why are the data processed?

We process data in order to deliver mail items to the 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 confirm to senders that their 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.

14.4. How long do we process data for?

Magyar Posta 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 the data subject may enforce any legal dispute that may arise between Magyar Posta Zrt. and the data subject in court within this period.

14.5. Do we involve data processors?

Magyar Posta uses subcontractors for its carriage activity, who take part in the forwarding and delivery of mail to the addressees, and, to do this, they process data that are essential for this. A list of the subcontractors used is available on our website www.posta.hu.

14.6. 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 (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’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. In addition, the personnel involved by Magyar

Posta’s subcontractors as data processors in carrying out the activity may also access the data.

15. Processing video data (CCTV)

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

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

- the consent of the data subjects which is evident in that they enter the area observed by a video camera (Info Act, Section 5(1)(a))

When using cameras, Magyar Posta acts in accordance with the provisions of Act CXXXIII of 2005 on the protection of persons and property and the activities of private investigators (hereinafter referred to as the “Property Act”), Sections 30 to 31.

15.2. What data do we process?

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

15.3. Why are the data processed?

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

15.4. How long do we process data for?

Magyar Posta abides by the deadlines of Section 31 of the aforementioned Property Act also when processing video footage. As post offices also offer services related to securities, financial services and insurance, video footage is retained for a maximum of 60 days. However, this does not mean that Magyar Posta 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 deleted.

15.5. Do we involve data processors?

Magyar Posta does not use data processors for operating cameras, but performs the operation itself.

15.6. Who may access the data?

Video footage is only accessed in justified cases by colleagues with duties involving the protection of life and property. Footage is not transferred to other organisations or persons, except the courts and the authorities provided the court or the authority requests this by the deadline specified in the Property Act for processing video footage.

16. Data processing related to physical access control

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

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

Magyar Posta processes the data based on the voluntary consent of the data subject which is evident in that data subjects can decide freely whether to give their data and enter the building. The data are provided to Magyar Posta by the data subject.

When using the physical access control system, Magyar Posta acts in compliance with the provisions of Act CXXXIII of 2005 on the protection of persons and property and the activities of private investigators (hereinafter referred to as the "Property Act"), Section 32.

16.2. What data do we process?

data	Why?
name	to identify the person entering and check authorisation
identifier of entry badge	to identify the person entering and check authorisation
document identifier	to identify the person entering and check authorisation

16.2.1. What can the reception staff member or the security guard ask?

Data subjects should be aware that employees and security guards 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

- to explain the purpose of their stay in the building used by Magyar Posta
- 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.

16.3. Why are the data processed?

Magyar Posta processes the 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.

16.4. How long do we process data for?

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.

16.5. Do we involve 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. To provide the security service, Magyar Posta uses Pajzs 07 Biztonságvédelmi és Magánnyomozó Zártkörűen Működő Részvénytársaság (Company registration number: 01-10-045764; Registered office: 1149 Budapest, Angol utca 77) and CIVIL Biztonsági Szolgálat Zártkörűen Működő Részvénytársaság (Company registration number: 01-10-044642; Registered office: 1149 Budapest, Angol utca 77). Magyar Posta displays information about this in the guarded buildings.

16.6. Who may access the data?

In the case of electronic entry systems, postal staff designated to operate these have access to the data, and in paper-based systems the security guards and postal personnel performing the reception service 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'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.

17. Magyar Posta'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's products and services provided they explicitly consent to this, but Magyar Posta may also contact them with the offers of its contractual partners.

17.1. What range of data processing does this cover?

Data processing	Data protection registration number
Magyar Posta sends its own advertisements and offers and those of its contractual partners by e-mail, telephone, text message or post to Magyar Posta's customers	NAIH-70129/2013 00127-0034
Lifestyle database Data subjects who consent <ul style="list-style-type: none"> – are contacted by Magyar Posta with its own advertisements and offers as well as those of its contractual partners by e-mail, telephone or post – have their consumption patterns surveyed and analysed to enable Magyar Posta to 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. 	00127-0018
Based on the consent given when requesting the Posta Loyalty Card service, data subjects <ul style="list-style-type: none"> – 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 – 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 	NAIH-76272/2014

contractual partners and to define their target groups.	
To send customers registering for Magyar Posta's electronic services Magyar Posta's own advertisements and offers as well as those of its contractual partners by e-mail, telephone or post (MyPost)	NAIH-77767/2014
Philatelic marketing – to keep in contact with data subjects about philatelic products, and 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)	NAIH-76175/2014
Magyar Posta – Sales assistance <ul style="list-style-type: none"> – 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 – establishing contact with interested customers to discuss offers and arrange an appointment in person, in writing, over the phone or in an e-mail	NAIH-40795/2012
Based on consent granted when using the Bill Checker service, data subjects <ul style="list-style-type: none"> – are directly contacted by Magyar Posta with its own offers and information as well as those of its contractual partners by both electronic (e.g. e-mail, telephone, web interfaces) and paper-based (e.g. mail item, direct mail) channels; – analysing, identifying and expanding Magyar Posta's potential clientele and markets considering the habits of the data subjects using the service; – developing Magyar Posta's products and services considering the habits of the data subjects using the service 	NAIH-89452/2015

Magyar Posta advises data subjects of these data processings before they give their consent. Information about these data processings is given together in this section in a transparent manner.

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

For all data processing

- the voluntary consent of the data subjects (Info Act, Section 5(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.

17.3. Why are data processed and what data are processed?

Data protection registration number	Purpose of data processing	Data									
NAIH-70129/2013	Magyar Posta sends its own advertisements and offers and those of its contractual partners by e-mail, telephone, text message or post to Magyar Posta's customers	<table border="1"> <tr><td data-bbox="847 1111 1401 1151">name</td></tr> <tr><td data-bbox="847 1151 1401 1227">permanent address (only if no postal address is given)</td></tr> <tr><td data-bbox="847 1227 1401 1267">postal address</td></tr> <tr><td data-bbox="847 1267 1401 1308">date of birth</td></tr> <tr><td data-bbox="847 1308 1401 1348">telephone number</td></tr> <tr><td data-bbox="847 1348 1401 1388">e-mail address</td></tr> <tr><td data-bbox="847 1388 1401 1464">level of education (8 years primary, secondary, tertiary)</td></tr> <tr><td data-bbox="847 1464 1401 1630">household status (single, multiperson (no children, one child, two, three or more children under 18))</td></tr> <tr><td data-bbox="847 1630 1401 1946">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)</td></tr> </table>	name	permanent address (only if no postal address is given)	postal address	date of birth	telephone number	e-mail address	level of education (8 years primary, secondary, tertiary)	household status (single, multiperson (no children, one child, two, three or more children under 18))	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)
name											
permanent address (only if no postal address is given)											
postal address											
date of birth											
telephone number											
e-mail address											
level of education (8 years primary, secondary, tertiary)											
household status (single, multiperson (no children, one child, two, three or more children under 18))											
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)											

00127-0034		<p>services used or intended to be used (Government bonds, Term deposit, Savings deposit, Savings combined with insurance, Life insurance, Property insurance (house, contents, motor), Travel insurance, Banking services (account keeping, loans), Home savings, Regular parcel dispatch, courier service, Other postal service)</p>
		<p>data of purchased products (amount, product, name, code)</p>
00127-0018	<p>Lifestyle database Data subjects who consent</p> <ul style="list-style-type: none"> – are contacted by Magyar Posta with its own advertisements and offers as well as those of its contractual partners by e-mail, telephone or post – have their consumption patterns surveyed and analysed to enable Magyar Posta to 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 	<p>name</p> <p>postal address</p> <p>fixed line phone number</p> <p>mobile phone number</p> <p>e-mail address</p> <p>sex</p> <p>marital status</p> <p>date of birth</p> <p>total number of people living in household</p> <p>year of birth and sex of children living in household</p> <p>your highest level of education</p> <p>What is your job?</p> <p>What line of business are you working in; what area of work interests you?</p> <p>Roughly what is the net monthly income of your household?</p> <p>Who owns your house?</p> <p>Do you intend to move in the near future?</p> <p>What type of home do you live in or do you intend to purchase?</p> <p>What do you intend to renovate in the near future?</p> <p>What sort of heating do you have and what type do you intend to have?</p> <p>Would you change service providers in order to make savings?</p> <p>What kind of pet do you have?</p>

		What electronics do you have in your household and what type do you intend to obtain?
		Which is your landline telephone provider?
		Which mobile operator do you have a pre-paid or post-paid contract with?
		What sort of Internet connection do you have at home and what type do you intend to have in the near future?
		Which company is your Internet service provider?
		Do you make purchases on the Internet?
		Where would you collect your parcel if you were not at home during the day?
		Do you make purchases or order services on foreign websites?
		Do you order products from a catalogue store?
		Roughly how much do you spend on everyday items each month?
		How do you usually pay your household bills (electricity, water, television, telephone, common charges)?
		Do you usually eat at the places below?
		Where do you bank?
		Which services do you use and which do you intend to use?
		What charitable causes do you give to?
		Which voluntary pension fund are you a member of?
		What insurance policies do you have and which do you intend to take out in the near future?
		Which insurance companies are you a customer of? Which types of insurance do you hold with them?

		How many cars maintained by you do you have in your household?
		Year of production of the car(s)
		What make and type of car(s) do you own?
		When do you intend to buy a car?
		Do you intend to buy a new or used car?
		What car would you buy?
		Where do you usually take petrol?
		What motorcycle do you have and what type do you intend to buy in the near future?
		Do you usually spend 1 week or longer on holiday?
		Do you have long weekends away?
		Are you interested in any of the journeys below?
		What mode of transport do you prefer?
		What type of accommodation do you usually stay at when travelling?
		How do you usually book accommodation, travel and board?
		Typically, what do you use travel agents for?
		Which foreign languages do you speak?
		Which language would you learn in the near future and which would you take a language exam in?
		Which method would you use to learn a foreign language?
		What language course would you attend?
		What topics interest you?
		When entering a prize draw, what prize motivates you most?
		What sports do you do?
		Which dailies do you read?
		What type of periodicals do you read?
		Do you have a daily paper or periodical subscription?

		What price category are the cosmetics and hygiene products you usually purchased in?
		Do you smoke?
		Would you like to give up smoking?
		Do you use any of the following therapeutic aids?
		Where did you hear about the questionnaire?
NAIH-76272/2014	<p>Based on the consent given when requesting the Posta Loyalty Card service, data subjects are contacted</p> <ul style="list-style-type: none"> – by Magyar Posta with its own advertisements and offers and those of its contractual partners by e-mail, telephone or post, and – 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 	<p>name</p> <p>date of birth</p> <p>sex</p> <p>permanent address</p> <p>postal address</p> <p>e-mail address</p> <p>telephone number</p> <p>data of purchased products or services used (amount, product name, code)</p> <p>level of education (8 years primary, secondary, tertiary)</p> <p>data related to household status (single, multiperson (no children, one child, two, three or more children under 18))</p> <p>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)</p>

		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)
NAIH-77767/2014	To send customers registering for Magyar Posta's electronic services Magyar Posta's own advertisements and offers as well as those of its contractual partners by e-mail, telephone or post (MyPost)	name
		e-mail address
		telephone number
NAIH-76175/2014	Philatelic marketing – to keep in contact with data subjects about philatelic products, and to send them offers, information about products and services, and advertisements by post, e-mail, telephone and other electronic channels (e.g. in a Facebook message or Instagram post)	name
		address
		e-mail address
		telephone number
NAIH-40795/2012	Magyar Posta – Sales assistance <ul style="list-style-type: none"> – 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 – establishing contact with interested customers to discuss offers and arrange an appointment in person, in writing, over the phone or in an e-mail 	name
		address
		telephone number
		e-mail address
		data related to planning wealth creation
		planning further study for a child
		data related to planning home maintenance, insurance
		data related to planning buying a car
		data related to savings objectives
		data related to holiday plans
data related to planning pensions		
data related to planning changes in living conditions		

		data related to health
		data related to planning pensions
		data related to home security and maintenance
NAIH-89452/2015	<p>Based on consent granted when using the Bill Checker service, data subjects</p> <ul style="list-style-type: none"> – are directly contacted by Magyar Posta with its own offers and information as well as those of its contractual partners by both electronic (e.g. e-mail, telephone, web interfaces) and paper-based (e.g. mail item, direct mail) channels; – analysing, identifying and expanding Magyar Posta’s potential clientele and markets considering the habits of the data subjects using the service; – developing Magyar Posta’s products and services considering the habits of the data subjects using the service 	name
		address
		e-mail address
		telephone number
		date of birth
		IP address
		<p>the data of bills paid using the Posta Loyalty Card (yellow and white forms)</p> <ul style="list-style-type: none"> – payer’s name and address – payee’s name and address – payee’s bank account number – information in the notes section marked by service providers or payers – amount – payer’s identifier (the identification used by service providers and marked on the payment form)
		date and time of payment
		place of payment
		the income, expenditure and spending data of the data subject and their categories
		customer identification number

17.4. How long do we process data for?

Magyar Posta processes data for the data processing presented above – with the exception of “Magyar Posta – Sales assistance” – until consent is withdrawn. As regards “Magyar Posta – Sales assistance”, Magyar Posta processes data for 30 working days following the date of recording the data. Naturally, the data subject may withdraw consent or request his or her data to be deleted during this period of time as well, and Magyar Posta will comply with the request.

17.5. Do we involve data processors?

To contact individuals by e-mail or post, for producing leaflets, newsletters, informative materials and forms, Magyar Posta uses EPDB Nyomtatási Központ Zártkörűen Működő Részvénytársaság (Address: 1117 Budapest, Budafoki út 107-109; Company registration number: 01 10 048079; Tax number: 24924243-2-43) for printing and sending e-mails, and Next Wave Europe Kft. (Address: 1122 Budapest, Csaba utca 24, A. ép.; Company registration number: 01-09-909776; Tax number: 14567339-2-41; www.nextwaveeurope.com; bruno.bitter@nextwave.hu) for sending e-mails.

17.6. Who may access the data?

Magyar Posta stores and processes the data of the presented 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 persons addressing the advertisements to be sent (EPDB Zrt. Next Wave Europe Kft.) or contacting the addressee of the advertisement (Magyar Posta's customer service line staff) as well as employees dealing with complaints submitted by the addressee of the advertisement.

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.

18. 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.

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

Magyar Posta 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's current prize competition.

18.2. What data do we process?

data	Why?
name	<ul style="list-style-type: none"> – to identify the person of the entrant – to pay the tax on the winner's prize if Magyar Posta undertakes to do so
address	<ul style="list-style-type: none"> – to identify the person of the entrant – to contact and notify the winner
telephone number	to contact and notify the winner
e-mail address	to contact and notify the winner
date of birth	<ul style="list-style-type: none"> – to check eligibility if there is such a condition to take part in the competition – to pay the tax on the winner's prize if Magyar Posta undertakes to do so
photographs	<ul style="list-style-type: none"> – to take photographs of accepting the prize, – to use for providing information about the prize competition
place of birth	<ul style="list-style-type: none"> – to check eligibility if there is such a condition to take part in the competition – to pay the tax on the winner's prize if Magyar Posta undertakes to do so
mother's name	to pay the tax on the winner's prize if Magyar Posta undertakes to do so
tax identification number	to pay the tax on the winner's prize if Magyar Posta undertakes to do so
identifier (e.g. Facebook identifier, Loyalty Card identifier, etc.)	<ul style="list-style-type: none"> – 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 the relevant data from those winners who accept the prizes.

18.3. Why are the data processed?

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 photographs of the prize being awarded and featuring this in information about the prize competition provided the winner consents to having photographs taken when accepting the prize.

18.4. How long do we process data for?

Magyar Posta processes the data of the entrants until the draw and then deletes them. Thereafter, Magyar Posta only processes the data of the winners until the prizes are awarded and, if Magyar Posta has assumed payment of the tax obligation, it processes the data processed in connection with taxation listed under point 18.2 for 5 years after the year of the tax return (Act XCII of 2003 on the rules of taxation, Section 164). 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 will delete the data. The entrant whose data Magyar Posta deleted at his or her request before the draw cannot take part in the prize draw and consequently cannot be a winner, and, if the winner requests his or her data to be deleted before receiving the prize, that person cannot then accept the prize.

18.5. Do we involve data processors?

Magyar Posta uses a data processor to conduct some prize competitions. Preliminary information is provided about this in every case in the rules for the competition.

18.6. Who may access the data?

The data may be accessed by Magyar Posta'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, by 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 needed in order to advise them 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 photographs of the prize being awarded and to these being used for information about the prize competition, the photographs will be published.

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.

19. Customer Service

Magyar Posta 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 has organised its customer service to ensure that any data subject who wishes to contact Magyar Posta to make a complaint, enquire about a service or exercise a right related to their personal data (requests to delete, block or correct data, or raise an objection) can contact Magyar Posta through it.

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

- the consent of the data subjects which is evident in that they give their data when contacting Magyar Posta's customer service either in person or by phone, e-mail or through the website www.posta.hu (Info Act, Section 5(1)(a))

and

- Act CLIX of 2012 on postal services, Section 57

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.

- Act CLV of 1997 on consumer protection (hereinafter referred to as the "Consumer Act"), Sections 17/A to 17/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 a sound recording of complaints reported over the phone stating the deadline for storing these.

19.2. What data do we process?

data	Why?
consumer's name (Consumer Act, Section 17/A(5)(a))	<ul style="list-style-type: none"> – to identify the consumer – to be kept in the record about the complaint
consumer's place and date of birth	to identify the consumer
consumer's mother's name	to identify the consumer
consumer's address (Consumer Act, Section 17/A(5)(a))	<ul style="list-style-type: none"> – to send the reply to the consumer – to be given in the report made about the complaint
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 appearing in documents 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"> – to prove that the complaint or request originates from the consumer – to be kept in the record about the complaint
individual identification number for the complaint (Consumer Act, Sections 17/A(4) and (5)(g), and 17/B(3))	<ul style="list-style-type: none"> – to identify, record and trace sound recordings made of a complaint over the phone – to be kept in the record about the complaint
sound recording of the conversation made 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))	<ul style="list-style-type: none"> – to record the complaint, – to be kept in the record about the complaint
the place and date of making the record (Consumer Act, Section 17/A(5)(f))	to be kept in the record about the complaint

19.3. Why are the data processed?

Magyar Posta processes consumers' data for the purpose of

- fulfilling their requests,

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

19.4. How long do we process data for?

Magyar Posta must keep records of complaints and responses to them for 5 years.
(Consumer Act, Section 17/A(7))

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

19.5. Do we involve 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. Magyar Posta's contractors and agents are listed in the information for each service and on the www.posta.hu website.

19.6. Who may access the data?

The data are accessible to Magyar Posta'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) have access to the 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.

Dependent on the nature of each service, more than one authority may exercise control over Magyar Posta's customer service activity. For postal services this is the National Media and Infocommunications Authority (Nemzeti Média és Hírközlési Hatóság; Address: 1015 Budapest, Ostrom u. 23-25; Postal address: 1525 Budapest Pf. 75; Telephone: (+361) 457 7100; Fax: (+36 1) 356 5520; E-mail: info@nmhh.hu; Website: www.nmhh.hu), and for payment services the Magyar Nemzeti Bank (Address: 1054 Budapest, Szabadság tér 9; E-mail: ugyfelszolgalat@mnbb.hu). The Magyar Nemzeti Bank settles disputed matters out of court via the Financial Arbitration Board (Pénzügyi Békéltető Testület; Address: 1013 Budapest, Krisztina

krt. 39; Postal address: H-1525 Budapest Pf.:172; Telephone: +36-40-203-776; E-mail: ugyfelszolgalat@mnbb.hu).

Magyar Posta 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's activity related to consumers within its financial activity is supervised by the Magyar Nemzeti Bank, and Magyar Posta is obliged to supply data to the Magyar Nemzeti Bank 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).

19.7. Can I ask for a copy of the sound recording?

Yes. The consumer may be given a copy of the sound recording upon request which Magyar Posta will provide free of charge. (Consumer Act, Section 17/A(7)) In order to protect the data, Magyar Posta will save the sound 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 accept it. Magyar Posta will only forward a sound recording by e-mail at the consumer's explicit request made in the knowledge of the risks of sending material by e-mail.

20. Data processing to measure the quality of service

Magyar Posta 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.

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

Magyar Posta processes the data of data subjects based on their prior, voluntary consent in accordance with Act CXII of 2011 on informational self-determination and freedom of information, Section 5(1)(a).

Customers who give their data to Magyar Posta for the purpose of, for instance, sending test mail assist the Company in these quality measurements.

20.2. What data do we process?

data	Why?
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)
telephone number	to contact the person involved in the quality measurement (e.g. to check compliance with quality measurement requirements)

20.3. Why are the data processed?

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

20.4. How long do we process data for?

Magyar Posta processes data for 12 months after they have been recorded. Naturally, the data subject may withdraw his or her consent within this period, in which case Magyar Posta will delete the data.

20.5. Do we involve data processors?

Magyar Posta does not use data processors.

20.6. Who may access the data?

The data may be accessed by Magyar Posta's staff involved in measuring quality (quality measurement and analysis staff, and quality assurance officers). 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.

21. Labour market database

Magyar Posta offers the opportunity to people seeking employment at the Company of asking Magyar Posta to retain their application even if there is no post that can

currently be offered to them. 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.

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

Magyar Posta processes data based on the voluntary consent of the data subjects which is evident in that people interested in vacancies apply to Magyar Posta, forwarding their data, and ask to be entered in the labour market database containing people interested in job vacancies.

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 returns the data or, if the data subject so requests, destroys and deletes them.

21.2. What data do we process?

data	Why?
name	to identify, record and contact the person interested in vacancies
address for notifications	to contact the person interested in vacancies, to send notifications of vacancies
telephone 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 the 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 delete all other information such as information relating to the nature of their health impairment, medical treatment and illness.

21.3. Why are the data processed?

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.

21.4. How long do we process data for?

Magyar Posta processes the data of applicants to the labour market database for 1 year from the date of application and then deletes the data without notifying the applicant and destroys documents submitted or returns them to the applicant. Naturally, the data subject may withdraw his or her application (consent to data processing) within this period, in which case Magyar Posta will delete the data after the withdrawal of consent and destroy documents submitted or return them to the applicant.

The applicant may request data to be deleted and his or her consent to be withdrawn by writing to Magyar Posta Zrt. at 1540 Budapest or by sending an e-mail to toborzas@posta.hu.

21.5. Do we involve data processors?

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

21.6. Who may access the data?

The data may be accessed by personnel at Magyar Posta 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 does not disclose the data to other organisations or individuals.

22. Data security

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

22.1. Organisational measures

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

In implementing Magyar Posta'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 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 and developing our information technology systems, in particular breach management and change management, 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 when devising and when amending these.

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.

It is a requirement, 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 (clean desk policy).

22.2. Technical measures

Magyar Posta protects the buildings it operates or uses, the rooms within these buildings and thus the data processed and stored there through various means of protection (e.g. alarm, CCTV, access control, fire protection systems, etc.). Furthermore, Magyar Posta 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. In every case hardware firewalls (border protection devices) are installed at all entry points of public networks used.

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, 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 done by SCH Ózon Kft. (Company registration number: 01-09-912524; Registered office: 1215 Budapest, Duna utca 42), using a dual-compartment shredder and compactor complying with strict security requirements, regularly inspected by Magyar Posta.

23. What rights do I have related to my data? (data subject's rights)

The data subject's rights:

- to request information
- to request that data be corrected

- to request that data be deleted or blocked
- to object to data processing

23.1. Request for information

Data subjects may request information at any time about their data which are being processed, in particular

- 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 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 anyone can access the data and whether anyone has done anything illegal with the data (circumstances of a privacy incident), and, if yes,
 - what the effects of this were,
 - what Magyar Posta did in order to manage this situation and protect the data (measures taken to rectify the situation),
- whether Magyar Posta has transferred the data to anyone and, if yes,
 - on what grounds Magyar Posta did this (the legal basis for the data transfer) and
 - to whom the data were transferred (recipient of the data transfer).

Magyar Posta answers requests for information within 25 days at most.

In certain cases, such as the prevention of crime or for national security interests, Magyar Posta must refuse to supply information based on the provisions of the law. The legal provision of the Info Act based on which supplying information is refused is always indicated in the reply.

23.2. Request to correct (change) 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 Posta Loyalty Card wishes to give a new telephone number or postal address, he or she may request Magyar Posta to change the old one for the new.

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 unclear whether the data processed are correct or accurate, Magyar Posta does not alter the data, only notes that the data subject has objected but the correctness of the data is uncertain.

The data subject is advised of the correction or that a note has been made.

23.3. Request to delete or block data

The data subject may request that his or her data be deleted. This means that Magyar Posta may no longer process and keep records of the data affected by the request for deletion.

The data subject may also request that his or her data be neither used nor deleted. This is called blocking data.

However, Magyar Posta may not delete or block data whose processing is required by law. Magyar Posta must use and keep records of such data.

It may occur that the data subject requests Magyar Posta to delete data but it can be presumed that deleting them would put the data subject in a disadvantageous situation. In this case Magyar Posta blocks the data.

The data subject is informed of the deletion or blocking.

23.4. Objecting to data processing

The data subject may object to data processing related to him or her. If the objection is well-founded, Magyar Posta stops processing and blocks the data.

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 Posta Loyalty Card holder objects to his or her data being processed, by doing so he or she requests the deletion of the data, and the data must be deleted.

If exception is taken to or a complaint is made about data processing, this is deemed objection if Magyar Posta has used or transferred the data without having to ask for the data subject's prior consent. In this case the data subject can only indicate subsequently if he or she does not wish the data to be processed by Magyar Posta.

Such a case is 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 want 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.

Data whose processing is required by law cannot be deleted or blocked even if the data subject objects to the obligatory processing.

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.

Magyar Posta decides about objections within 15 days and informs the data subject of its decision.

If the data subject does not agree with Magyar Posta's decision, he or she may take legal action. The data subject may decide whether to bring an action before the court based on his or her place of residence (permanent address) or temporary residence (temporary address) (<http://birosag.hu/torvenyszekek>).

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

23.5. Where can I contact Magyar Posta in order to enforce my rights?

A request for information, correction, blocking or deletion related to personal data or an objection against data processing can be made at any time at the contact details given below:

- by post to the address of the Customer Service Directorate:
Ügyfélszolgálati Igazgatóság, 3512 Miskolc,
- by faxing (+36) 46-320-136,
- by sending an e-mail to ugyfelszolgalat@posta.hu,
- by phoning (+36) 1-767-8282 giving your name and address,
- in person at Magyar Posta Zrt., District X, Budapest, Üllői út 114-116.

Magyar Posta may provide different contact details in its preliminary information for 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.

24. Where can I turn to protect my rights?

If you think that the way Magyar Posta processes your 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 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: 1125 Budapest, Szilágyi Erzsébet fasor 22/c; Postal address: 1530 Budapest, Pf.: 5; E-mail: ugyfelszolgalat@naih.hu; 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>.