

PRIVACY POLICY

Please, revise carefully this Privacy Policy before the disclosure of your personal data. This Privacy Policy includes all information related to the data processing activity of MEGADRIVE Branch Office concerning the collection, use, storage, disclosure and erasure of data (with special attention to personal data), in line with Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: 'GDPR').

I. PREAMBLE

- 1.1. The Hungarian Branch Office of MEGADRIVE Autovermietung GmbH (hereinafter: 'Controller') is a company established, registered and operating in Hungary, the main activity of which is the rental of vehicles and the provision of related ancillary services (hereinafter: 'Service'). In the course of this activity, the users of the Service, i.e. our customers and other contributors (hereinafter referred to together as 'Data Subject') may disclose certain personal data to the Controller; hence, in order to ensure the compliance with the respective laws and regulations, the Controller has resolved on the formulation of this Privacy Policy concerning the external aspects of data processing.
- 1.2. For the purposes of this Privacy Policy, the terms 'we' or 'our' etc. shall mean the Controller.
- 1.3. This Privacy Policy requires the expressed consent hereto by the Data Subject; such consent may be withdrawn at any time.
- 1.4. The Controller is responsible for the conclusion, enforcement, updating and amending of this Privacy Policy. The Controller may amend this Privacy Policy unilaterally, at any time. Certain business processes and development require that the purposes of data processing are extended in the future. The Controller hereby undertakes to proceed in strict compliance with the provisions of the GDPR in any case that requires the processing of personal data. This Policy comes into effect upon its publication. The prevailing version of this Policy is available on the website: <http://buchbinder.hu/> (hereinafter: 'Website').
- 1.5. The Controller ensures that every Data Subject has the right to be informed, in particular, of the purposes for which the personal data are processed, the period for which the personal data are processed, the recipients of the personal data, the logic involved in any automated personal data processing, the possible consequences of such processing and the scope of information to which the Data Subject is entitled. This right should not adversely affect the rights or freedoms of others, including trade secrets or intellectual property and in particular the copyright protecting the software. However, these considerations should not lead the Controller to deny the Data Subject all information.
- 1.6. The expressed consent to this Privacy Policy given by electronic means shall be freely given, specific and informed; only such consent may serve as a basis of processing of the Data Subject's personal data. The consent shall be given by placing a tick into the square designated for such purpose on the Website of the Controller. The consent covers all processing activities carried out for the same purpose or purposes.
- 1.7. The Controller is committed to the protection of the Data Subject's personal data and puts special emphasis on the observance of informational self-determination rights; hence, it undertakes to handle the personal data of Data Subject confidentially and to take all safety, technical and organizational measures to ensure the security of data.
- 1.8. The Controller shall process the personal data lawfully, fairly and in a transparent manner; the collection of data is allowed only for specifically defined, unambiguous and lawful purposes and the scope of the collected data is limited to those suitable and relevant from the aspect of the purposes of data processing and necessary for the achievement thereof.
- 1.9. In the course of data processing, the Controller shall attempt to ensure the accuracy and up-to-date nature of the personal data; therefore, it shall take all necessary measures for the immediate erasure or rectification of the data that are inaccurate from the aspect of the purposes of the processing.

1.10. In view of the fact that the registered seat of the Controller is in Hungary, the provision of administrative protection in connection with the personal data processing defined in this Privacy Policy is the competence of Nemzeti Adatvédelmi és Információbiztonsági Hatóság (Hungarian National Authority for Data Protection and Freedom of Information, 'NAIH').

2. CONTROLLER'S DATA

Name of Controller	MEGADRIVE Autovermietung GmbH, Hungarian Branch
Registered seat of Controller	H-1139 Budapest, Váci út 99.
Establishment of the Controller	H-1185 Budapest, Budapest Liszt Ferenc Nemzetközi Repülőtér, T2 Terminál
The contact details of Controller, its e-mail address used for regular communication with Data Subjects	info@buchbinder.co.hu
Company reg. no.	01-17-000793
The company's tax number	24358606-2-41
The name of the registering authority	Budapest Capital Regional Court as Court of Registry
Phone number	(+36) 1 225 21 70
Website	http://buchbinder.hu
The language of the contract	Hungarian or English

3. APPLICABLE LAWS

The Controller hereby declares to process the personal data of data subjects who are not (yet) in contractual relationship with the Controller, as well as its contractual partners in compliance with the applicable laws and regulations, with special regard to the following:

- The related EU regulation: the General Data Protection Regulation of the European Union (Regulation 2016/679 (EU), the 'GDPR')
- Article VI of the Fundamental Law of Hungary
- Act CXII of 2011 on Informational Self-Determination and the Freedom of Information (Info tv.)
- Act V of 2013 on the Civil Code (Civil Code)
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (Electronic Commerce Act)
- Act CLV of 1997 on Consumer Protection (Consumer Protection Act)
- Act C of 2003 on Electronic Communications (Electronic Communications Act)
- Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (Security Services Act)

4. LEGAL GROUND FOR DATA PROCESSING

4.1. The legal ground for personal data processing is the voluntary consent of the Data Subject given thereto in knowledge of this information (Article 6 (1)(a) of the GDPR).

4.2. The Controller is entitled to process the Data Subject's data on the basis of the contract concluded by and between the Controller and the Data Subject, in line with the purpose of such contract, for the sake of contractual performance (Article 6(1)(b) of the GDPR).

4.3. The processing of the personal data may be required for the performance of the Controller's legal obligations, like auditing and accounting liabilities (Article 6(1)(c) of GDPR).

4.4. The processing of the personal data may be required for the enforcement of the legitimate interest of the Controller or a third party (Article 6(1)(f) of GDPR).

4.5. The legal basis may also be the data processing permit granted under Section 13/A of the Electronic Commerce Act, according to which the personal identification data (name, maiden name, mother's maiden name, place and date of birth) and the address of the Data Subject may be processed without the Data Subject's consent for the purposes of creating, defining the content of, amending, monitoring the performance of, and invoicing for the fees arising from, a contract for the provision of an information society service, and the enforcement of claims in connection therewith; furthermore, the personal identification data, the address and the data related to the date, duration and place of the use of the services may be processed for the purposes of invoicing of the fees arising from the contract for the provision of an information society service without the consent of the Data Subject thereto.

4.6. For the use of personal data for advertising purposes, the Data Subject shall give specific, explicit consent.

5. THE DATA PROCESSED BY THE CONTROLLER

5.1. In order to be able to use the Services, the Data Subject shall disclose certain personal information to the Controller either personally, or through electronically. Whenever the Controller requests the Data Subject to provide personal data, the Data Subject may reject to comply with such request; however, in this case, the Controller is entitled to lawfully reject the provision of Services, hence, the Data Subject may not be able to use such Services.

5.2. Within the scope of data processing, the Controller is entitled in particular to pursue the following activities: to collect, record, register, systematize, store and use the personal data for the purposes of data processing, to query, block, erase and destruct the data and to prevent the further use thereof

5.3. Mandatory data provision by Data Subjects

5.3.1. The Controller may process the following data provided by the Data Subjects. The disclosure of these data is necessary for the provision of the Services:

Data Subject	Data category	Legal basis	Purpose of Data Processing
Customer using the Service, by means of registration, booking	Name (first and last name)	4.1.	Conclusion, amendment and performance of the contract, Operation and development, identification of the Data Subject and ensuring the communication, Maintenance and development of Service Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud, Advertisement, marketing activities
	email address	4.1.	Conclusion, amendment and performance of the contract, Operation and development, identification of the Data Subject and ensuring the communication, Maintenance and development of service establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud, Advertisement, marketing activities, Sending newsletter Direct marketing via e-mail
	phone number	4.1.	Operation and development, identification of the Data Subject and ensuring the communication Advertisement, marketing activities, Direct marketing via phone or text message
	password	4.1.	Operation and development, identification of the Data Subject and ensuring the communication

Data Subject	Data category	Legal basis	Purpose of Data Processing
Complainer, applicant	Name (first and last name)	4.1. 4.3.	Carrying out and performing the complaint handling procedure; Identification of the Data Subject and ensuring the communication
	Email address	4.1. 4.3.	Carrying out and performing the complaint handling procedure; Identification of the Data Subject and ensuring the communication
	Phone number	4.1. 4.3.	Carrying out and performing the complaint handling procedure; Identification of the Data Subject and ensuring the communication
	Address	4.1. 4.3.	Carrying out and performing the complaint handling procedure; Identification of the Data Subject and ensuring the communication

5.4. Data optionally disclosed by Data Subjects

5.4.1. The Controller may process the following data provided by the Data Subjects. The disclosure of these data is not necessary for registration and booking, but the provision thereof is essential for the conclusion of a valid and binding contract.

Data Subject	Data category	Legal basis	Purpose of Data Processing
Customer contracted to use the service by online booking or paper order form http://buchbinder.hu/rentcar/reserve	Name	4.1.	Conclusion, amendment and performance of the contract, Operation and development, identification of the Data Subject and ensuring the communication, Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud, Advertisement, marketing activities, Information used by the payment system, invoicing of the service fee
	Place and date of birth	4.1.	Conclusion, amendment and performance of the contract, identification of the Data Subject and ensuring the communication, Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud,
	Mother's maiden name	4.1.	Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud
	Email address	4.1.	Conclusion, amendment and performance of the contract, Operation and development, identification of the Data Subject and ensuring the communication,

		<p>Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud, Advertisement, marketing activities, Sending newsletter Direct marketing via e-mail Information used by the payment system, invoicing of the service fee</p>
Phone number	4.1.	<p>Conclusion, amendment and performance of the contract, Operation and development, identification of the Data Subject and ensuring the communication Advertisement, marketing activities, Direct marketing via phone or text message</p>
Address	4.1.	<p>Conclusion, amendment and performance of the contract, Identification of the Data Subject and ensuring the communication Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud, Information used by the payment system, invoicing of the service fee</p>
The number and the date of expiry of personal identification certificate/passport	4.1.	<p>Conclusion, amendment and performance of the contract, Identification of the Data Subject Establishment and maintenance of a reliable and safe environment, Enforcement of claims and rights, Prevention and handling of fraud,</p>
The type, number, date of expiry of driver's license	4.1.	<p>Conclusion, amendment and performance of the contract, Identification of the Data Subject Establishment and maintenance of a reliable and safe environment, Enforcement of claims and rights, Prevention and handling of fraud,</p>
Bank or credit card details	4.1.	<p>Establishment and maintenance of a reliable and safe environment, Enforcement of claims and rights, Prevention and handling of fraud, Information used by the payment system, invoicing of the service fee</p>

5.4.2. The Data Subject may exercise his/her right to the restriction of data processing, to rectification or erasure of data and the right to object with respect to the data listed in Section 5.3.1 and 5.4.1. herein at any time, free of charge. For this purpose, the Controller shall ensure the possibility of electronic submission of the related requests to the following e-mail address: info@buchbinder.co.hu. If such a request is submitted, the Controller shall respond to the Data Subject without undue delay, but in any

case, within twenty-five (25) days from the receipt of the request. Should the Controller refuse to perform the request, it shall provide a proper justification of such refusal.

5.5. Automatic collection of data

5.5.1. If the Data Subject does not expressly provide the Controller with his/her personal data and information in line with the provisions of this Privacy Policy, the Controller may not collect or process any personal data of the Data Subject in a way that would allow the Data Subject to be personally identified.

5.5.2. The scope of data collected automatically by the Controller in relation to the services, that are necessary for the proper performance and development of the Services:

Data Subject	Data category	Legal basis	Purpose of Data Processing
Customer contracted to use the Service	GPS data	4.1.	Operation and development, identification of the Data Subject and ensuring the communication, Establishment and maintenance of a reliable and safe environment, Enforcement of claims and rights, Prevention and handling of fraud, Protection of life, persons and assets
Customer contracted to use the Service	Telematic data: (1) position, (2) information on collision and the related data, (3) reports on the vehicle's operation circumstances, mileage, diagnostic and performance-related data.	4.1.	Operation and development, identification of the Data Subject and ensuring the communication, Establishment and maintenance of a reliable and safe environment, Enforcement of claims and rights, Prevention and handling of fraud, Protection of life, persons and assets

5.5.3. Due to the nature of the Services, the Controller may collect the approximate or precise GPS data of the Data Subject and the vehicle telematics data during the use of the Service by means of built-in devices capable of recording and transmission of GPS coordinates and the above data. In case the Data Subject does not consent to the recording of these data, in order to prevent the misuse of the Services, no contract may be concluded with him/her.

5.6. Data collected by electronic surveillance system (camera)

5.6.1. In order to protect the life, physical integrity, personal freedom, to protect business, payment, banking and securities secrets and in order to protect its assets, Controller operates a camera system at its registered seat and its establishment, which continuously observes and records the events there in cinematic form (without sound). The sole purpose of such data processing by Controller is the protection of the legitimate interests of Controller (protection of property) and is not intended for any other purpose, in particular the further use by the Controller of the location data of the persons captured by the camera or their activities in relation to the Data Subjects.

5.6.2. The legal basis for this data processing is the freely given consent of the Data Subject. Information on the operation of the camera system is provided on the signs displayed by the Data Controller and the Electronic Surveillance System Policy available at the reception of Controller. Consent may also be given in the form of implicit conduct. Implicit conduct is, in particular, if the Data Subject enters or resides in units affected by the camera system.

5.6.3. Data subjects: any natural person entering or staying in the area monitored by the camera system.

5.6.4. Employees of the car rental company and other persons in a legal relationship with Controller for other work activities were provided with written information about the operation of the electronic surveillance

system and have signed the occurrence of this information. Consent to the use of the electronic surveillance system by persons who are not employees of Controller and are not in a legal relationship with Controller for other work activities is voluntary and is given through implicit conduct. The use of the electronic surveillance system shall be accompanied by a warning sign or description for third parties wishing to appear in the area in a clearly visible place, in a clearly legible manner, in a way that facilitates orientation.

5.6.5. Further regulations related to the electronic monitoring system are set out by Controller in the Electronic Surveillance System Policy.

5.7. Data collected from third parties

5.7.1. The Controller does not collect data from third parties. Should such data collection occur in the future, the provision of the data collected in this way relating to the Data Subject or the transfer of such data to the Data Controller requires the express consent of the Data Subject, which he/she can give directly to the third party in possession of all relevant information. Granting his/her consent shall be the responsibility of the Data Subject and is not supervised by any means by the Controller; furthermore, the Controller is not liable for the collection and processing of such data by third parties. The transfer of the collected data towards the Controller shall be expressly authorized by the Data Subject on the interfaces of the concerned third party.

5.7.2. The services of third parties: if the Data Subject uses the services of a third-party service provider (like Facebook) in relation to getting access to Controller's Services, the Controller shall be entitled to request from the concerned third party the data of the Data Subject that are essential to the provision of the Services. The privacy settings of the third party service provider apply to the provision or change of this data.

5.8. Cookies applied by the Controller

5.8.1. Cookies are short text files comprising of data related to the Data Subject, sent by the browser to the hard disc of the Data Subject's computer or mobile device. Such data are those of the Data Subject's computer or device, generated in the course of the use of the Website and recorded by the cookies automatically in the course of technical processes. The automatically recorded data are automatically logged by the system upon visiting or leaving an application, without any statement or action of the Data Subject.

5.8.2. By visiting the Website, the Data Subjects consent to the use of session-type cookies by the Controller in relation to the Website or the application, which are (in the sole consideration of the Controller) explicitly needed to browse through the Website and to use the functions thereof (e.g. recording of operations performed by visitor). The validity of such cookies is limited to the current visit of the Data Subject; such cookies are automatically deleted from the computer upon the end of the working session or by closing the browser.

5.8.3. The Controller uses only the cookies of third parties (e.g. Google).

5.8.4. The advertisements of the Controller are displayed on various websites on the Internet by external service providers (Google, Facebook). These external service providers (Google, Facebook) store the data of previous visits of the Data Subject on the Controller's Website by means of cookies, that allows them to display personalized advertisements for the Data Subject (so-called remarketing activity).

5.8.5. To the data processing activities of such external service providers the provisions of their data policies shall apply. The Controller's liability for such data processing is explicitly excluded.

5.8.6. The use of technologies mentioned above: the data collected by means of the above technologies may not be used for the identification of the Data Subject and these data may not be connected by the Controller to any other data that are suitable for such identification purposes.

5.8.7. The primary purpose of such data is the proper operation of the Website or the application by the Controller, that requires the follow-up of visitors' data and the detection of possible misuse.

5.8.8. In addition to the above, the Controller may use such information to analyse usage trends and to improve and develop the functions of the Website and to obtain comprehensive traffic data on its overall use. The information acquired this way may be used by the Controller to compile and analyse statistics on usage and to third parties or make public anonymously in aggregate form statistical data that are not suitable for such identification (e.g. number of visitors, most viewed topics or content).

5.8.9. Possibility to disable cookies: if the Data Subject objects to the collection of his/her data by the Controller in connection with the use of the Website or the application, he/she may fully or partially disable the use of the cookies among the settings of the browser or modify the settings of the cookie messages, acknowledging that this may make it more difficult to use the Website.

6. THE METHOD AND TERM OF THE USE OF THE DATA COLLECTED

6.1. Controller processes only personal data that is necessary for the purpose of the processing, is suitable for the achievement of that purpose, and only to the extent and for the duration necessary for the achievement of that purpose.

6.2. In lack of a related legal obligation, the Controller will not publish, combine or link the personal data with each other.

Purpose of Data Processing	Justification of purpose	Duration of data processing
The conclusion, amendment and performance of the contract	The Controller uses the data collected for the following purposes to conclude, amend and perform contracts. The personal data collected in the course of the use of the Services are used to facilitate and enable the performance of the transaction initiated by the Data Subject. The Controller shall use the personal data of the Data Subject to enable the establishment of the contractual background for the provision of the services ordered by the Data Subject and to facilitate the fulfilment of the contract.	The Controller shall process the personal data during the term and following the expiry of the contractual relationship until the Data Subject requests for the erasure of his/her data in a letter sent to the info@buchbinder.co.hu e-mail address. For the purposes of evidence in the case of a dispute, the data of the Data Subject concerned shall be processed during the term of the general limitation period or, in the event of a dispute, for five (5) years after its final conclusion. Should the establishment of the contractual relationship fail for any reason, the data shall be deleted immediately, except if they are still necessary for the purposes of legal enforcement.
Maintenance and development of service	The Controller shall use the data collected by it or through third-party service provider for the following purposes of maintenance and development of service. The personal data collected in the course of the use of the Services are used to facilitate the transaction requested by the Data Subject and to keep it up to date. The Controller shall use the personal data of the Data Subject to enable the continuous development and improvement of the Services.	
Operation and development, identification of the Data	The Controller may use the Data Subject's personal data to provide	

Subject and ensuring the communication	efficient Service, to perform analyses and to conduct customer satisfaction surveys through the contact details provided by the Data Subject. In the scope of the above, the Controller shall be entitled to the following activities: to ensure the accessibility and the use of the Website, to ensure its operation, protection, improvement, development and optimization, and send support, update and security-related information.	
Establishment and maintenance of a reliable and safe environment, enforcement of claims and rights, prevention and handling of fraud	The Controller may use the personal data of the Data Subject to secure the legitimate interests of Data Subjects in the course of the use of Services and to ensure the compliance with the provisions of the General Terms and Conditions accepted by the Data Subject and the applicable laws and regulations. In the scope of the above, the Controller shall be entitled to the following activities: the prevention and termination of fraud, spam, misuses and other harmful activities, to perform security investigations and risk analysis, to check and verify the data provided by the Data Subject and to take the steps allowed by the laws against any kind of Data Subject activity breaching the parties' contract.	
Advertisement, marketing activities	The Controller may use the personal data of Data Subject solely for the following advertisement and marketing activities: to send promotion messages, advertisements, newsletters, other information popularizing the Services via phone or e-mail, to display the sponsored games, surveys, promotion activities and events of the Controller and its cooperating partners.	The Data Subject may unsubscribe from advertisement-related communication at any time, through the info@buchbinder.co.hu e-mail address, in the profile settings and, in case of newsletters, by clicking directly on the unsubscribe function in the newsletter.
Information used by the payment system, invoicing of the service fee	The personal data of the Data Subject may be used exclusively to ensure the performance of the contract by the Data Subject, including the conduction of any potential procedures for the enforcement of rights.	The Controller automatically deletes the payment data of the Data Subject at the moment the rental agreement is printed. Thereafter, such data are only included in the rental agreement. The Controller processes the data until the Data Subject requests for the erasure of his/her data in a

letter sent to the info@buchbinder.co.hu e-mail address. For the purposes of evidence in the case of a dispute, the data of the Data Subject concerned shall be processed during the term of the general limitation period or, in the event of a dispute, for five (5) years after its final conclusion. Should the establishment of the contractual relationship fail for any reason, the data shall be deleted immediately, except if they are still necessary for the purposes of legal enforcement.

Carrying out the complaint handling procedure

Verification and documentation of the conduct of the procedure, the actual investigation.

The Controller shall process the data concerned until the purpose of the processing ceases to exist, or shall erase them if the further processing of the data is no longer necessary for the purpose of the processing. The data is stored for 5 years under the consumer protection rules, or 10 years after the deletion provided for in the Infotv.

Protection of life, persons and assets

The Controller may use the personal data of Data Subjects to ensure the performance of the contract by the Data Subject, in order to detect infringements and to prevent such infringing acts and misuse.

The Controller shall process the personal data during the term and following the expiry of the contractual relationship until the Data Subject requests for the erasure of his/her data in a letter sent to the info@buchbinder.co.hu e-mail address. For the purposes of evidence in the case of a dispute, the data of the Data Subject concerned shall be processed during the term of the general limitation period or, in the event of a dispute, for five (5) years after its final conclusion. Should the establishment of the contractual relationship fail for any reason, the data shall be deleted immediately, except if they are still

Protection of property through the operation of a camera system	The purpose of the data collected through the operation of the camera system is to protect the assets and property in the monitored area, the contracts concluded, the identification of the parties involved, the prevention of accidents in the area and the detection of the circumstances of the accidents that occurred, quality assurance reasons, the clarification and detection of the dispute in the case of quality assurance complaints, the investigation of complaints, etc.	necessary for the purposes of legal enforcement. The Controller processes the data recorded by the camera in order to detect infringements recorded by the surveillance system, to catch the perpetrator in the act and to prevent such infringements. The Controller may keep the records for thirty days, after which it will delete them in an irreversible manner.
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7. THE PERSONS HAVING ACCESS TO THE DATA PROCESSED

- 7.1. In order to ensure the undisturbed provision of the Services, it may be necessary to transfer certain data to third parties, of which the Data Subject shall be informed of in any case as described here. In The Controller, its employees and subcontractors are entitled to access the personal data in accordance with applicable legislation.
- 7.2. The Controller may transfer the Data Subject's personal data only within the company group In order to ensure the proper performance of the Service, for quality assurance purposes, and to investigate possible customer claims and complaints. By accepting this Policy, the Data Subject expressly consents to this transfer.
- 7.3. If data transfer takes place, the Controller shall maintain a transmission log, including the date of transmission, the legal basis of transmission and the recipient, the scope of the personal data transmitted, and other information specified by the relevant legislation on data processing.
- 7.4. Data transfer may take place in the following cases:

Recipient of data transfer	Scope of data that may be transferred
Transfer of data to Partners	When using the Service, the Controller sends to its contracted Partners the personal data that are indispensable for the use of the service of the given Partner: <ul style="list-style-type: none"> - In case of an accident, the Partner responsible for the evaluation of damages; - Partner providing accounting services; - Partner providing legal services; - Partner providing information technology services; - towards NAIH or other authorities, if necessary
Transfer of data to employees	The personal data listed in Section 5 above may be accessed by the Controller, including the Controller's employees, but only if processing of such data is indispensable for the purposes of the processing corresponding to the given category of data.
Data transfer within the company group	In order to ensure the proper provision of the services and for quality assurance purposes, the Controller may transfer the personal data within its company group and to the following legal persons related to the company group by means of cooperation agreements: <ul style="list-style-type: none"> - MEGADRIVE Autovermietung GmbH

- EMOB Services Germany GmbH
- A.Klees Slovakia, s.r.o

Electronic invoicing system	In the course of provision of the services, the Controller does not use any separate invoicing system.
Publicly displayable information	The Controller may only display publicly those information with respect to which the Data Subject has granted his/her consent to the disclosure thereof on the social/public surfaces of the Controller's Partners.
Compliance with Laws	The Controller shall not disclose the personal data provided to it to any third party or parties other than as provided for in this Section 7, except if requested to do so by a public authority, state or administrative body or court on the basis of a legal obligation and the Controller is not entitled to refuse to do so under the applicable legislation, in particular in the case of speeding, parking fines, etc., at the request of the competent police, parking company, court or other body.

7.5. Under no circumstances shall the Controller be responsible for the data processing activity of third party service providers (e.g. Google, Facebook, Partner etc.), which shall in all cases be governed by their own privacy policies.

7.6. For the purpose of undisturbed provision of the Services, the Controller uses the contribution of the following third-party service providers:

Hosting service provider, or a company providing system operation services to the Controller upon contractual relationship (Data Processor)

Name: Cybersystems Kft.
 The address of the hosting service provider: H-1132 Budapest, Victor Hugo u. 18-22.
 Telephone number of the hosting service provider: +36 1 336-0138
 E-mail address of the hosting service provider: info@cyber.hu
 The website of the hosting service provider: www.cyber.hu
 Company reg. no.: 01-09-711603
 Tax number: 12951233-2-41
 Represented by: Levente Deák

Name: Websupport Magyarország Kft.
 Registered seat: 1132 Budapest, Victor Hugó utca 18-22.
 Co. reg. nr.: 01-09-381419
 Tax number: 25138205-2-41
 Represented by: Südy András

7.7. The Data Processor performs data storage services with respect to the personal data transferred to it by the Controller in the course of its regular activities. The Controller hereby expressly declares that it has no direct or indirect liability with respect to the data processing activity of the Data Processor and the security of personal data in the course thereof; in this regard, the privacy policies and regulations of the Data Processor shall apply.

7.8. The Controller hereby reserves the right to involve further data processors to the processing, of which fact the Data Subjects shall be notified by the amendment of this Policy.

7.9. Otherwise, the personal data of Data Subjects are not transferred to any third party by the Controller.

8. RIGHTS AND OBLIGATIONS OF THE PARTIES

8.1. Processing of Data Subjects' data

- 8.1.1. The Data Subject has the right of access to personal data collected about him or her and to exercise that right easily and at reasonable intervals, in order to ascertain and verify the lawfulness of the processing. The Controller aims to keep the personal data accurate and up-to-date; notwithstanding the above, the Data Subject shall notify the Controller of any change in his/her data, at info@buchbinder.co.hu. The Data Subject shall be responsible for ensuring the up-to-date status of the personal data.
- 8.1.2. The Controller shall take appropriate measures to provide the Data Subject with all information and notice related to data processing in a concise, transparent, intelligible and easily accessible form, using clear and plain language. Information is provided by the Controller on request primarily through its mail address (info@buchbinder.com) in writing, or verbally via phone (+(36) 1 225 21 70); furthermore, such information may be requested directly at the registered seat of the Controller. Information may only be given after the verification of the Data Subject's identity.
- 8.1.3. The Controller shall provide to the Data Subject information on the actions taken upon his/her request without undue delay, but in any event within twenty-five (25) of receipt of such request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Controller shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay.
- 8.1.4. If the Controller does not act on the request of the Data Subject, the Controller shall inform the Data Subject without delay, but at the latest within one month of receipt of the request of the reasons for not taking any action and of the possibility for the Data Subject to lodge a complaint with a supervisory authority and to exercise his or her right to judicial remedy.
- 8.1.5. The exercise of this right to access of the Data Subject shall be ensured by the Controller free of charge; however, if the request is obviously unfounded or excessive (for example, it is repeated several times), the Controller may refuse to take action or charge a fee, taking into account the administrative expenses occurred in relation to the provision of information or taking the requested action.
- 8.1.6. Where the Controller processes a large quantity of information concerning the Data Subject, the Controller may request the Data Subject to specify the information or processing activities to which the request relates before the information is delivered.

8.2. Access

The Controller shall use all reasonable measures to verify the identity of a Data Subject requesting access, in particular in the context of online services and online identifiers. The Controller may not retain personal data for the sole purpose of being able to react to potential requests.

8.3. Rectification and erasure

- 8.3.1. The Data Subject is entitled to request the rectification of personal data relating to him or her and the 'right to be forgotten' where the retention of such data infringes the provisions of the related laws and regulations.
- 8.3.2. In particular, the Data Subject is entitled to have his/her personal data erased and no longer processed where the personal data are no longer necessary in relation to the purposes for which they are originally processed.

8.4. Withdrawal of consent and restriction of processing

- 8.4.1. The Data Subject is entitled to withdraw his/her consent given previously to the processing of his/her data.
- 8.4.2. However, the further retention of the personal data is considered to be lawful where it is necessary for the protection of exercising the right of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest etc. The processing of

personal data is essential until the contractual relationship between the Controller and the Data Subject is contractually fulfilled.

8.5. Right to object

Where personal data might lawfully be processed because processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or on grounds of the legitimate interests of a controller or a third party, the Data Subject shall, nevertheless, be entitled to object to the processing of any personal data relating to his or her particular situation.

8.6. The Obligation of the Data Subject

8.6.1. The Data Subject may only provide his/her own personal data in the course of using the Services and declares the quality, lawfulness, reality and accuracy of such data under criminal liability. Where the data subject does not provide his or her own personal data, it is the responsibility of the data provider to obtain the data subject's consent. If the Controller is concerned about the quality of the data provided, it may request the Data Subject to verify such data. If the Data Subject rejects to perform the Controller's request for verification, or the Controller, in its sole discretion, declares the data unlawful, unreal or inaccurate, the processing of such data may not be continued, and the Controller may reject to provide the Services.

8.6.2. The Controller shall have no liability, either direct or indirect, for the legal consequences arising from the fact that the Data Subject provided another person's data or provided false data, even if the Controller requested for the verification thereof.

9. FURTHER IMPORTANT INFORMATION

9.1. Records of data processing activities

According to the GDPR, the Controller is required to keep records of the processing activities if the provisions of Article 30 (5) are met during the performance of the activity, however the Infotv. imposes stricter conditions than the GDPR, therefore, as a main rule, data controllers need to keep records of their processing activities. In addition, that data processing related to the employees is not to be considered occasional, therefore, in all cases of employment, keeping a record of processing activities is necessary, which condition the Controller complies.

9.2. Data Protection Officer

In our standpoint, the Controller is not obliged to comply with the obligation of appointment of data protection officer, as the main activities of the Controller do not involve data processing operations that would allow a regular, systematic and high-scale follow-up monitoring of the Data Subjects; furthermore, the Controller does not process sensitive personal data or data relating to criminal offences in the course of its activities.

9.3. Supervisory organs and other authorities

The territorial scope of this Privacy Policy may also extend to other foreign authorities, in case the Data Subject is concerned in relation to a registered office or place of business outside Hungary.

9.4. Automated decision making, profiling

The Controller hereby declares that it applies no decision-making procedures that are based solely on automated processing, including profiling, which would have legal effects on the Data Subject similarly significantly affect the Data Subject. Should the Controller apply such procedures in the future, the Data Subjects shall be properly notified thereof, and their consents will be requested.

9.5. Processing of sensitive data

9.5.1. The Controller hereby declares that processes no personal data which are, by their nature, particularly sensitive in relation to fundamental rights and freedoms merit specific protection as the context of their processing could create significant risks to the fundamental rights and freedoms. Should the Controller process such sensitive data in the future, this activity shall be pursued with special care and diligence, it may only process the sensitive data to the extent it is required, and the expressed consent of the Data Subject will be required.

9.5.2. The Controller hereby declares that it does not process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data intended to uniquely identify a natural person, nor does it process health data or personal data revealing the sexual life or sexual orientation of natural persons.

10. PERSONAL DATA BREACH

In case of personal data breach, we notify the data protection supervisory authority required by the laws and regulations, within 72 hours from becoming aware of the breach. The personal data breaches shall also be recorded into a registry. The data subjects affected by such personal data breach will also be notified, if the applicable laws and regulations require so.

11. HANDLING OF COMPLAINTS

11.1. The Data Subject has the right to lodge a complaint with the competent supervisory authority in the event of a breach of rights relating to the processing of data by the Controller:

National Authority for Data Protection and Freedom of Information ("Nemzeti Adatvédelmi és Információszabadság Hatóság")

Website: <http://naih.hu>

Mailing address: H-1363 Budapest, Pf.: 9.

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Email: ugyfelszolgalat@naih.hu

Phone number: +36(1)391-1400

11.2. Furthermore, in the event of a breach of the protection of personal data, an action may be brought against the Controller before the Budapest Capital Regional Court.

12. CHANGES OF THE PRIVACY POLICY

12.1. The Controller reserves the right to amend this Privacy Policy at any time. Amendments will be published immediately on the website <http://buchbinder.hu/>.

12.2. In case of amendment, the Data Subject will be notified by e-mail no later than 30 (thirty) days before the effective date.

12.3. In case the Data Subject does not agree with any of the changes, he or she may object to them by sending an e-mail to info@buchbinder.co.hu and request the deletion of his or her data.