

Privacy Policy of the cookies applied in the Online Ticket Purchase System of MÁV-START

1. Data Manager

Name: MÁV-START Railway Passenger Transport Co.
Registered address: Könyves Kálmán krt. 54-60., Budapest, H-1087, Hungary
Registration number: 01-10-045551
Court of registration: The Budapest Metropolitan Court as Court of Registration
VAT Number: 13834492-2-44
(hereinafter 'MÁV-START Co.' or 'Data Manager').

2. Data Processor

Name: MÁV Service Center Co.
Registered address: Könyves Kálmán krt. 54-60., Budapest, H-1087, Hungary
Registration number: 01-10-045838
Court of registration: The Budapest Metropolitan Court as Court of Registration
VAT Number: 14130179-2-44
E-mail: helpdesk@mav-szk.hu
Location of data storage: Krisztina krt. 37/A, Budapest, H-1012, Hungary

hereinafter 'Data Processor'.

Data Processor provides a complete IT service based on the contract with Data Manager that includes the operation of communication applications, including the website.

3. Subject of this Privacy Policy

Regarding the data management in this Privacy Policy, all natural persons who visit the <https://jegy.mav.hu/> website operated by the Data Controller (hereinafter: the website) with the help of any IT tool (hereinafter: tool) and thus the website places cookies used by the data subject shall be deemed to be subject of this Privacy Policy (hereinafter: subject).

4. Data Management information

Short description of data management: if you visit the Data Manager's website, the website places so-called 'cookies' on the device you use or in the browser with which you visited the website. A cookie is a small packet of data sent by the server of the Data Controller's website to the browser of the website visitor, with which the browser and the server communicate with each other and the information thus obtained can be used for various purposes.

Data Manager uses 2 types of cookies:

- a) so called functional cookies, which are essential for the operation of the website, therefore their application is necessary and independent of your will.
- b) the so-called statistical cookies, which the website places on your device only if you have given your explicit consent to it. You can give your consent by sliding the switch that appears after clicking the "Edit" button in the pop-up window when you visit the page and agree to the use of ‘Statistical cookies’ and save the setting. The use of the site is not affected by these cookies.

The categories of personal data, the purpose and legal basis of the data management:

Domain	Name of cookie	Type of cookie	Description, purpose of data management	Legal base	Cookie expiration
jegy.mav.hu	BIGipServer prefix + unique identifier	Functional (obligatory)	A firewall cookie used to ensure a secure network connection	Legitimate interest of Data Manager in accordance with Article 6 (1) (f) of GDPR	When closing the browser tab
jegy.mav.hu	TS prefix + unique identifier	Functional (obligatory)	Firewall cookie used to prevent DoS attacks	Legitimate interest of Data Manager in accordance with Article 6 (1) (f) of GDPR	When closing the browser tab
mav.hu	rxVisitor	Statistical (optional)	Monitoring system cookie used to quickly detect and fix application errors	With the consent of the subject in accordance with Article 6 (1) (a) of GDPR	2 days
mav.hu	clientchoice	Statistical (optional)	Monitoring system cookie used to quickly detect and fix application errors	With the consent of the subject in accordance with Article 6 (1) (a) of GDPR	3 months

Method of data management: electronically only.

Source of data: the subject. Data Manager does not handle personal data from sources other than the subject.

Range of persons entitled to know the data: only employees performing the tasks related to the development of the website are entitled to know the data.

5. Information on measures for data security

5.1. Data storage, security of data management

- In collaboration with Data Processor, Data Manager:
 - o takes the necessary technical and organisational measures to make the proper operation and functioning of the application in accordance with the IT Security Policies;
 - o ensures that eligible users access the application's functions and data according to their level of authority;
 - o takes care of saving and storing data;
 - o observes the procedural rules necessary to enforce the provisions of the data protection legislation specified in point 9. The uploaded files are subjected to virus checking and other security screenings by the Data Manager through the Data Processor.
- The hardware elements of the System are located in the server room of MÁV Service Center Co. (Krisztina krt. 37., Budapest, H-1012. Hungary), as Data Processor.
- Data Manager takes all technical, managerial and organizational measures to protect the security of data handling, which provides a level of security appropriate to the data management; selects the IT tools used and operates them so, that the data treated:
 - o is accessible to all authorised persons (availability);
 - o is ensured to be credible and authenticated (authenticity of data management);
 - o can be proved to be unchanged (data integrity);
 - o is accessible only to authorised persons, and is protected against unauthorised access (confidentiality).

6. Rights and enforcement of rights

6.1. Right to request information

Information, data correction and limitation of data handling can be requested in written form from Data Manager through the contact details in point 1.

At your request, Data Manager provides information about the handled data; the purpose, legal basis and duration of data handling; the name and address (seat) of the Data Manager; the name and address (seat) of the Data Processor and its activities related to data management; the contact details of the data protection officer; who and for what purpose receives or has received your personal data; and your rights regarding data management. The Data Manager shall provide the information in writing and in a legible form within the shortest possible time, but no later than within one month from the submission of the request. If necessary, considering the complexity and number of requests, this time limit may be extended by two months. If the request for information is unfounded or - especially because it is repetitive - excessive, Data Manager may set a cost reimbursement or deny taking action based on the request.

6.2. Right to withdraw consent

You may withdraw your consent to the placement of cookies at any time before the end of the data handling period. Withdrawal of consent does not affect the lawfulness of the data handling performed by the Data Manager prior to the withdrawal.

You can withdraw your consent by deleting the cookies from the device, which you can do in the appropriate menu item of your browser, for which you can find further help in your browser's Help.

6.3. Right to access

You are entitled to receive feedback from Data Manager as to whether his/her personal information is being processed.

Based on the right to access you are entitled to access to personal data relating to ongoing data management and to the following information:

- purpose of data management,
- the categories of personal data concerned,
- duration of data handling,
- who and for what purpose receives or has received your personal information,
- your rights regarding the data handling,
- the right to submit complaint to the supervisory authority.

By your request, Data Manager will provide you a copy of the personal data that is the subject of data processing, as long as it does not adversely affect the rights and freedoms of others. Data Manager may apply an administrative fee (cost reimbursement) for the additional copies requested.

6.4. Modifying (correcting) and deleting data

Modification (correction) of inaccurate personal data and supplementing incomplete data can be requested in written form through the contact details in point 1.

You can request the deletion of your personal data in written form through the contact details in point 1. if: the data handling is unlawful; the purpose of data management is terminated; the consent to data handling has been withdrawn; the specified deadline for storing the data has expired; and it is ordered by a court or authority.

Data Manager notifies the requesting person and those who have received the data for data handling of the correction and of the deleting of the data. Notification can be omitted if it does not infringe the legitimate interest of the requesting person regarding the purpose of data handling.

Data Manager does not delete personal data if it is necessary to submit, enforce, or protect legal claims.

6.5. Limitation of data handling

Limitation of personal data can be requested in written form from Data Manager through the contact details in point 1. if:

- You dispute the accuracy of personal data (in this case, the restriction applies to the period during which Data Manager checks the accuracy of the data);
- data handling is illegal, but you opposed to the deletion of data and request them to be blocked or limited;
- the purpose of data management has ceased, but you need to submit, enforce or protect legal claims.

Limitation lasts until the reason you specify makes it necessary. In this case the personal data will only be handled - excluding storage - with your consent; or to submit, enforce or protect legal claims; or to protect the rights of another natural or legal person; or to deal with important public interest. The Data Manager informs you in advance, if the data will be unlocked by your request.

6.6. Data portability

In case of data handling based on Article 6 (1) (a) (consent) of GDPR, and data handling is automated, you can request in written form from Data Manager through the contact details in point 1. to receive your personal data in a structured, widely used, machine-readable format and are authorized to transfer it to another data manager. You also have the right, if technically feasible, to request the direct transfer of your data between data managers.

6.7. Right for objection

In the case of data handling based on Article 6 (1) (f) GDPR (legitimate interest), you may object in writing to the handling of your personal data (including profiling) through the contact details in point 1, in which case the Data Manager will no longer handle your data and will delete them.

Data Manager may continue to handle your personal data if the data handling is justified by compelling legitimate reasons, and if they are necessary for the submission, enforcement or protection of legal claims. In the event of your objection, Data Manager will limit the handling of the data for the period until it determines whether the legitimate reasons of the Data Manager take precedence over your legitimate reasons. You can express your objection to the use of functional cookies placed on your device by the Data Controller by deleting the functional cookies from your browser.

6.8. Right to appeal

In the event of violation of rights or in the event of disagreement with the decision of the Data Manager, the User may submit a complaint to the Hungarian National Authority for Data Protection and Freedom of Information:

Name:	Hungarian National Authority for Data Protection and Freedom of Information
Registered address /	Falk Miksa utca 9-11., Budapest, H-1055, Hungary /
Mailing address:	Pf. 9., Budapest, H-1363, Hungary
Phone:	(+36-1) 391-1400
Telefax:	(+36-1) 391-1410
E-mail:	ugyfelszolgalat@naih.hu

In the event of violation of rights or in the event of disagreement with the decision of the Data Manager, the user may appeal directly to the court competent for the address of Data Manager or for the address of the place of residence of the User, within 30 days of receiving the decision from the Data Manager. The court may hear the case without delay.

Further information in addition to the Privacy Policy can be requested through the contact information provided in point 1.

Comments, objections or information requests regarding the handling of personal data can also be sent to adatvedelem@mav-start.hu.

7. Applied law

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation or GDPR);
- Act No. CXII. on the Right of Informational Self-Determination and on Freedom of Information.

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