

# Privacy Policy on data processing by MÁV Passenger Transport Co. in online ticketing system

(applicable from 1<sup>th</sup> of June 2025)

The purpose of this Privacy Policy is for **MÁV Passenger Transport Co.** to provide information about data processing carried out in connection with online ticket sales in its systems operated for online ticket sales, such as the [www.jegy.mav.hu](http://www.jegy.mav.hu) website and the MÁV application in accordance with Article 13 of the General Data Protection Regulation of the European Union (hereinafter: GDPR). We inform the data subjects, that data processing related to the electronic sale, use and control of national and county passes is governed by sections 3.2, 3.4., 3.5 and 3.6. of this Privacy Policy, in addition, the information according to Article 13 of the GDPR is contained in a separate Privacy Policy, which is available on the Company's website (<https://www.mavcsoport.hu/en/mav-szemelyszallitas/introduction/privacy-policy>) We inform the data subjects that in connection with the operation of the MÁV+ application, where there is a difference from the data processing process in the jegy.mav.hu and MÁV applications, it will be displayed.

We inform the data subjects that the provisions of Sections 3.2.2.–3.2.4. of this data processing information shall apply to data processing carried out in connection with delay insurance. In addition, the information pursuant to Article 13 of the GDPR regarding matters related to the Data Controller's Customer Service is contained in a separate data processing information, which is available on the Company's website.

## 1. The Data controller's name and contact informations

Name:	<b>MÁV Passenger Transport Private Company Limited by Shares</b>
Headquarters:	Üllői út 131., Budapest, H-1091, Hungary
Co.reg.no.:	01-10-045551
VAT number:	13834492-2-44
E-mail:	<a href="mailto:eszrevetel@mavcsoport.hu">eszrevetel@mavcsoport.hu</a>

hereinafter: Data Controller

*Contact details of the Data Protection Officer:*

E-mail: [adatvedelem.szemely@mavcsoport.hu](mailto:adatvedelem.szemely@mavcsoport.hu)

Postal adress: P.O.Box 780., Budapest, H-1384, Hungary – Please indicate on the envelope the following: ‘for the Data Protection Officer’.

If the data subject purchases a domestic or international ticket in its online ticketing systems operated by the Data Controller, which entitles him or her to use the services of service provider(s) other than the Data Controller, the Data Controller qualifies as an independent data controller only in respect of the sales activity and any related data processing. With regard to other data processing related to the provision of services (e.g. checking the validity of tickets), the Data Controller does not determine the purpose of data processing independently, but performs it in the interest of the service provider(s) providing the service (e.g. data transfer), so in this regard it qualifies as a data processor.

If the data subject purchases a domestic or international ticket/pass in its online ticketing systems operated by the Data Controller, which entitles him or her to use the services of other service provider(s) in addition to the Data Controller, the service providers participating in the provision of services shall be considered joint data controllers. In such cases, the data subject may submit a request to exercise his or her right to exercise the right of data subject to any controller involved in the provision of services.

## 2. The Data processor's name and contact informations

Name:	<b>MÁV Service Center Private Limited Company</b>
Headquarters:	Dévai utca 23., Budapest, H-1134, Hungary
Co.reg.no.:	01-10-045838
VAT number:	14130179-2-44

hereinafter: Data processor.

Based on the service contract concluded between the Data Controller and the Data Processor, the Data Processor provides IT services to the Data Controller, which includes the operation and development of the website ([www.jegy.mav.hu](http://www.jegy.mav.hu)) used for ticket sales and the MÁV application, MÁV+ application, as well as the hosting service necessary for storing data, as well as the processing and analysis of electronically stored data in accordance with the Data Controller's instructions.

### 3. Information on individual data processing

#### 3.1. Registration on the online ticketing interface (the 'jegy.mav.hu' website and the 'MÁV application' and MÁV+ application)

##### 3.1.1. Creation of a user account providing personal data by the data subject

The data subject	All person, who registers on the jegy.mav.hu website and/or in the MÁV application and in the MÁV+ application creates user profile / user account.
Purpose of the data processing	Registration in the system operated by the Data Controller for online ticket sales ('jegy.mav.hu' or the 'MÁV application' or the 'MÁV+ application') for the purpose of creating a user account, including confirmation of the creation of a user account, in which the user has the opportunity to purchase an electronic ticket.
The legal basis of the data processing	Consent of the data subject (the user) [Article 6 (1) (a) of the GDPR].
Personal data processed to achieve the purpose of data processing	<ol style="list-style-type: none"><li>1. Create a user account, including confirmation of the creation of a user account: e-mail address, full name (first and last name), date of birth and password used to access the user account.</li><li>2. Billing data (not mandatory for registration, but a condition for successful purchase; can be modified or deleted at any time in the profile): billing name, billing address (country, postal code, city, name and type of public space, house number, floor/door).</li></ol>
Duration of the data processing	Until the consent is withdrawn (until the user profile is deleted).

##### 3.1.2. Creating a user account by linking it to an existing user account

The data subject	the natural person who registers with an existing user account (Google, Facebook or Apple) in the system operated by the Data Controller for the purpose of online ticket sales and creates a user profile / user account.
Purpose of the data processing	registration with an existing user account (Google, Facebook or Apple) in a system operated by the Data Controller for the purpose of online ticket sales in order to create a user account - including the confirmation of the creation of the user account - in which the user has the opportunity to save the personal data necessary for ticket purchase in order to facilitate (expedite) future ticket purchases.
The legal basis of the data processing	Consent of the data subject (the user) [Article 6 (1) (a) of the GDPR].
Personal data processed to achieve the purpose of data processing	<ol style="list-style-type: none"><li>a) creation of the user account, including also the confirmation of the creation of the user account: e-mail address, username, full name (family name and first name), password provided for the existing user account with the service provider (Google, Facebook or Apple).</li><li>b) invoicing data (not mandatory for registration, but a condition for successful purchase; can be modified or deleted at any time in the profile):</li></ol>

invoicing name, invoicing address (country, postal code, settlement, name and nature of public place, house number, floor/door).

**A személyes adatok forrása** the user account service provider chosen by the data subject (Google, facebook or Apple)

**Duration of the data processing** Until the consent is withdrawn (until the user profile is deleted).

### 3.2. Purchase of tickets with or without registration

The data subject	All person, who purchases a ticket after registration on the jegy.mav.hu website and/or in the MÁV application and/or in the MÁV+ application through the user profile or without registration.	
Purpose of the data processing	Ensuring the purchase of a personalized travel ticket entitling the Data Controller to use its services – including the validation of the discount – and sending the ticket electronically to the buyer, as well as excluding and preventing misuse of the tickets – including the discount.	
The legal basis of the data processing	Performance of the contract concluded between the Data Controller and the data subject for the provision and use of passenger transport services pursuant to Article 6 (1) (b) of the GDPR.	
Personal data processed to achieve the purpose of data processing	PROCESSED PERSONAL DATA	PURPOSE OF PERSONAL DATA PROCESSING
	Full name and date of birth of data subject	Issuing a name-specific e-ticket
	E-mail adress of data subject	Sending the e-ticket electronically
	Date of birth of data subject	Automatic provision of any discounts due to travel based on the age of the data subject
	Portrait photo of data subject	Identification of the data subject based on the virtual pass-holder, personal identification document
	Amount and title of the discount	Granting travel facilities to passengers
	Data of the travel route or, in the case of a ticket with territorial validity, the area of validity	Proper issuance of the e-ticket
	Discount card number	To prevent unauthorised use of the discounted ticket
	Billing data [billing name and billing address (country, postal code, city, name and type of public space, house number, floor/door)]	For the purpose of issuing an invoice when purchasing an e-ticket
	Ticket data in the barcode on the ticket (data visually displayed on the ticket according to the status at the time of purchase)	To prevent the misuse of the e-ticket
	Passenger's facial image (photo) and ID number(s) – only when purchasing a season ticket	Issuing an electronic pass card and checking eligibility for travel
	(Coupon) code to apply a discount	Ensuring the use of certain discounts
Duration of the data processing	In the case of the ticket, it lasts until the journey is used.	

Data transfer	<p><i>Recipient:</i> OTP Mobil Szolgáltató Kft. (registered office: 1143 Budapest, Hungária krt. 17-19., company registration number: 01-09-174466, contact: <a href="mailto:ugyfelszolgalat@simple.hu">ugyfelszolgalat@simple.hu</a>).</p> <p><i>The purpose of data transmission:</i> payment of the price of the ticket purchased electronically, strong customer authentication, fraud analysis and customer information.</p> <p><i>Legal basis for data transfer:</i> pursuant to Article 6 (1) (b) of the GDPR, performance of the contract concluded between the Data Controller and the data subject, as well as compliance with the data reporting obligation required under the PSD2 Directive and the SCA Regulation.</p>
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### 3.2.1. Keeping in touch with data subjects, sending information(s) related to travel and the operation of online ticket sales platforms.

The data subject	the natural person who purchased a ticket.
Data processing for purposes other than the intended initial purpose (purpose referred to the point 3.2)	informing the passenger directly, electronically (by e-mail) and/or by notification in the application (push message) about information concerning the travel route or validity area (e.g. delay, missed line, line cancellation or other emergency events). e-mails and notifications in the application (push message) related to the operation of online ticket sales platforms, which are exclusively information in connection with system use or function expansion.
The legal basis of the data processing	Performance of the contract concluded between the Data Controller and the data subject for the provision and use of passenger transport services pursuant to Article 6 (1) (b) of the GDPR, according to which the Data Controller must fulfil its obligation to provide information related to the service.
Personal data processed to achieve the purpose of data processing	the name and e-mail address of the person concerned who purchased a ticket on the online ticket sales platforms.
Duration of the data processing	Until an information message is sent to the passenger.

### 3.2.2. Data processing in connection with the use of the GPS location positioning function in the MÁV+ application

<b>The data subject concerned</b>	a natural person who turns on the GPS location positioning function during their travel.
<b>Purpose of data processing</b>	determining the physical location of the data subject concerned for the purpose of validating delay insurance, in particular identifying the line used for the travel, and facilitating travel planning and ticket purchase in the MÁV+ application.
<b>Legal basis for data processing</b>	according to Article 6 (1) (a) of the GDPR, the data subject's consent, which can be given during the use of the MÁV+ application or in the settings of the MÁV+ application by allowing the GPS-based location positioning function of the application. The data subject may withdraw his/her consent at any time without restriction, which does not affect the legality of the data processing carried out before the withdrawal of the consent. In the event of withdrawal of the consent, the use of the GPS-based location function of the MÁV+ application and the delay insurance based on it is not possible.
<b>Personal data processed to achieve the purpose of data processing</b>	the geophysical location of the data subject concerned.
<b>Duration of data processing</b>	until consent is withdrawn or location data is disabled. if the delay insurance is validated, the provisions in point 3.2.3. and 3.2.4. are relevant.
<b>Addressee of data transfer</b>	having regard to the GPS-based location positioning function of the MÁV+ application is provided by the so-called "Google Maps" application, which has been integrated into the website, the Data Controller transfers data to Google LLC. (seat: 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America) (hereinafter: "Google").

3.2.3. Data processing carried out in connection with destination and regional tickets purchased online (in the MÁV+ app, MÁV app, jegy.mav.hu website) related to delay insurance

<b>The data subject concerned</b>	a natural person who travels with a ticket purchased online on a line that is delayed by more than 20 minutes.	
<b>Purpose of data processing</b>	providing compensation to the passenger in the case of the train or bus arrives at the passenger's destination with a delay of at least 20 minutes.	
<b>Legal basis for data processing</b>	according to the Article 6 (1) (b) of the GDPR, the performance of a contract concluded between the Data Controller and the data subject for the provision and use of passenger transport services.	
<b>Personal data processed to achieve the purpose of data processing and the specific purpose of their processing</b>	a) the data on the ticket, the validity of the ticket, the line on which the data subject travelled	determining of delay and entitlement.
	b) the name of the data subject, invoicing information [invoicing name and invoicing address (country, postal code, settlement, name and nature of public space, house number, floor/door)], and the transaction identifier	issuance of invoice and fulfillment of delay insurance
<b>Method of data processing</b>	If the line set at the time of purchase (and indicated on the ticket) arrives at the destination indicated on the ticket with a delay exceeding 20 minutes, the system will automatically initiate a refund of 50% of the ticket price to the account belonging to the card used for purchase.	
<b>Duration of data processing</b>	a) personal data is processed primarily until the delay insurance is evaluated. b) insofar as the line delay is automatically recorded and the Data Controller makes a payment based on this, the Data Controller shall retain the accounting documents directly and indirectly supporting the accounting settlement in a readable and retrievable form for at least 8 years, according to the Article 169 (2) of the Act on Accounting.	
<b>Az adattovábbítás címzettje</b>	<p><i>Recipient:</i> OTP Mobil Szolgáltató Kft. (registered office: 1143 Budapest, Hungária krt. 17-19., company registration number: 01-09-174466, contact: <a href="mailto:ugyfelszolgalat@simple.hu">ugyfelszolgalat@simple.hu</a>).</p> <p><i>The purpose of data transmission:</i> payment of the price of the ticket purchased electronically, strong customer authentication, fraud analysis and customer information.</p> <p><i>Legal basis for data transfer:</i> pursuant to Article 6 (1) (b) of the GPDR, performance of the contract concluded between the Data Controller and the data subject, as well as compliance with the data reporting obligation required under the PSD2 Directive and the SCA Regulation.</p>	

3.2.4. Data processing carried out in connection with the online registration of non-online route tickets and regional tickets in relation to delay insurance.

<b>The data subject concerned</b>	<p>a natural person who travels on a line that is delayed by more than 20 minutes and</p> <p>a) registers his or her non-online destination ticket and Hungarian bank account number in the MÁV+ app or on the jegy.mav.hu website within 72 hours of arrival.</p> <p>or</p> <p>a natural person who registers his or her regionally valid ticket purchased not online in the MÁV+ application and selects the regionally valid ticket and line used for the travel in the MÁV+ application no later than upon arrival at the destination.</p>
<b>Purpose of data processing</b>	providing compensation to the passenger in the case the train or bus arrives at the passenger's destination with a delay of at least 20 minutes.



<b>Legal basis of data processing</b>	according to Article 6 (1) (b) of the GDPR, the performance of a contract concluded between the Data Controller and the data subject for the provision and use of passenger transport services.	
<b>Personal data processed to achieve the purpose of data processing and the specific purpose of their processing</b>	a) <b>in case of destination ticket</b> the data on the ticket, the validity of the ticket, the line on which the data subject travelled.	determining of delay and entitlement.
	the name of the data subject, invoicing data [invoicing name and invoicing address (country, postal code, settlement, name and nature of the public space, house number, floor/door)], the name of the data subject's Hungarian account-holding bank and its account number.	issuance of invoice and fulfillment of delay insurance.
	b) <b>in the case of a ticket with territorial validity</b> the data on the ticket, the validity of the ticket, the line which the data subject travelled.	determining of delay and entitlement.
	the name and e-mail address of the data subject, the electronic coupon code sent to the data subject	sending the e-coupon code electronically
<b>Method of data processing</b>	<p>a) <b>In the case of a destination ticket:</b> If the line set at the time of purchase arrives at the destination indicated on the ticket with a delay exceeding 20 minutes, the system will automatically initiate a refund of 50% of the ticket price to the given bank account number.</p> <p>b) <b>In the case of a regionally valid ticket:</b> The system examines whether the line is delayed by more than 20 minutes after the line is set, if so, the system automatically records the delay. After accumulating the required number of delays, the passenger automatically receives an electronic coupon code, which will give him or her a 10% credit on the price of the same type of product purchased online (MÁV+ app, MÁV app, jegy.mav.hu) within 45 days.</p>	
<b>Duration of data processing</b>	<p>a) personal data is processed primarily until the delay insurance is evaluated.</p> <p>b) if the line delay is automatically recorded and the Data Controller makes a payment based on this, the Data Controller shall retain the accounting documents directly and indirectly supporting the accounting settlement in a readable and retrievable form for at least 8 years, pursuant to Section 169 (2) of the Act on Accounting.</p>	
<b>Addressee of the data transfer</b>	<p><i>Recipient:</i> OTP Mobil Szolgáltató Kft. (registered office: 1143 Budapest, Hungária krt. 17-19., company registration number: 01-09-174466, contact: <a href="mailto:ugyfelszolgalat@simple.hu">ugyfelszolgalat@simple.hu</a>).</p> <p><i>The purpose of data transfer:</i> payment of the price of the ticket purchased electronically, refund of the delay insurance amount to the bank card used during the purchase, strong customer authentication, fraud analysis and customer information.</p> <p><i>Legal basis for data transfer:</i> pursuant to Article 6 (1) (b) of the GPDR, performance of the contract concluded between the Data Controller and the data subject, as well as compliance with the data reporting obligation required under the PSD2 Directive and the SCA Regulation.</p>	

### 3.3. Verification of entitlement to passenger transport services

The data subject	All person, who travels with a ticket purchased from the Data Controller and the entitlement to travel, including the verification of the entitlement to the discount and the right to travel linked to a person, is checked by the authorized person(s) acting on behalf of the Data Controller.
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Purpose of the data processing	<p>Checking the legality of using the transport service on production of a ticket or other document entitling them to travel or, in the case of discounts, of a document entitling them to the discount or any other document. During the verification, the ticket inspector acting on behalf of the Data Controller views the ticket during the identity check and scans the barcode (QR code) on the ticket with its device provided for this purpose, based on which the device used by him provides information about the ticket data (validity, route/area, discount, personalisation, etc.) at the time of purchase, which the ticket inspector compares with the data indicated on the ticket. In addition, if the right to travel is personal, the ticket inspector also requests the presentation of the virtual pass-holder (for pass-type products) and an identification document in order to establish identity, by consulting which he or she has the opportunity to compare the name, date of birth and ID number(s) on the verification device or ticket with the data on the card, and, based on the photograph on the card, determine whether the identity document is indeed the passenger's identity document, so that the ticket is actually used by the authorised person for the journey. During the ticket check, if the data subject applies any discount during his/her journey, the ticket inspector also looks at the document, ID card or certificate entitling him or her to the discount in order to verify eligibility for the discount.</p>
The legal basis of the data processing	<ol style="list-style-type: none"> <li>1. Performance of the contract concluded between the Data Controller and the data subject for the provision and use of passenger transport services pursuant to Article 6 (1) (b) of the GDPR.</li> <li>2. If the data subject uses a discount for his/her trip that also requires the processing of the data subject's health data (e.g. discount for persons with disabilities or military personnel), the lawfulness of the processing of sensitive data is supported by Article 9 (2) (f) of the GDPR, according to which data processing is necessary for establishing and enforcing the data subject's legal claim – entitlement to a discount related to travel.</li> </ol>
Personal data processed to achieve the purpose of data processing	<p>The ticket data on the ticket and the passenger's personal data (passenger's name, date of birth, title of the discount in case of discount) and name, date of birth, ID number and image (photo) on the virtual pass-holder and the document identifying the passenger.</p>
Duration of the data processing	<ol style="list-style-type: none"> <li>1. Data processing takes place primarily until the ticket is checked.</li> <li>2. The electronic log file of the e-ticket verification shall be kept for 5 years after the ticket has been verified.</li> </ol>

### 3.3.1. Transmission of data related to ticket checking

Recipient of the transfer and scope of personal data transferred	<p>If the ticket sold by the Data Controller entitles the use of one or more services provided individually or jointly by a service provider other than the Data Controller, or services provided jointly by the Data Controller and one or more service providers, and the verification is carried out by service provider(s) other than the Data Controller, the following personal data will be transmitted for this purpose, depending on the technical method of ticket control:</p> <ol style="list-style-type: none"> <li>1. In case of scanning the barcode and decrypting the data contained in the code: name and date of birth of the passenger, route of travel/area of validity of the ticket, information on travel discounts, validity of the ticket, other services purchased;</li> <li>2. By scanning the barcode in case of request by the external service provider to the Data Controller's database: name and date of birth of the passenger, route of travel/scope of the ticket, information on travel discounts, validity of the ticket, other services purchased.</li> </ol>
Purpose of the data transfer	<p>Verification of the validity of a ticket entitling the use of passenger transport services and thus of the entitlement to travel</p>

The legal basis of the data transfer	Performance of a contract concluded pursuant to Article 6 (1) (b) of the GDPR between the Data Controller and the other service provider(s) involved in the provision of services and the data subject for the provision and use of passenger transport services.
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### 3.3.2. Transmission of data related to international travel

The data subject	All person, who purchases a ticket, pass, supplementary ticket or seat reservation (hereinafter in this point together: ticket) for international journey after registration on the jegy.mav.hu website and/or in the MÁV application, and/or in the MÁV+ application and uses the passenger transport service internationally.
Recipient and method of the data transfer	An organization providing passenger transport services in a country other than Hungary (the Recipient), which participates in the organization and execution of the international travel of the person concerned. The data is transferred to the so-called ETCD system operated by the International Union of Railways (UIC), from which the Recipient queries the data necessary to check the validity of the ticket.
Scope of personal data transferred	<ul style="list-style-type: none"> <li>• the ticket number,</li> <li>• the date of issue of the ticket,</li> <li>• the name of the ticket/offer,</li> <li>• the identifier of the issuing railway company,</li> <li>• the start and end of the validity of the ticket or the start and end time of the journey,</li> <li>• the route of the journey (departure and destination station, route),</li> <li>• in the case of a train-bound ticket: the train number, in the case of a ticket to a specific seat: the train number, carriage number, seat number,</li> <li>• the carriage class of the ticket,</li> <li>• the number of passengers travelling with the given ticket,</li> <li>• the fact and time of the ticket refund request,</li> <li>• the time of ticket checking,</li> <li>• the location of the ticket checking (train number),</li> <li>• the identifier of the railway company carrying out the ticket checking,</li> <li>• the result of the ticket checking (accepted/rejected).</li> </ul>
Purpose of the data transfer	Checking the validity of the ticket entitling to use international passenger transport services, and thus the right to travel.
The legal basis of the data transfer	<p>Performance of a contract concluded pursuant to Article 6 (1) (b) of the GDPR between the Data Controller and the other service provider(s) involved in the provision of services and the data subject for the provision and use of passenger transport services.</p> <p>If data is transferred from the ETCD system to a Recipient that operates in a third country, the legal basis of the data transfer is Article 49 (1) point (b) of the GDPR, according to which the data transfer is necessary for the performance of a contract between the data subject and the data controller.</p>
Storage of data after data transfer	The personal data of the data subject will be stored for 3 months in the ETCD system after the end of validity of the international ticket.

### 3.4. Issuing an invoice for ticket purchase and keeping the invoice

The data subject	All person, who purchases a ticket on any interface of the Data Controller used for online ticket sales.
Purpose of the data processing	Issuing and keeping in accordance with law the invoice for the payment of the service provided by the Data Controller, if applicable, a document treated as a corrective invoice.
The legal basis of the data processing	Compliance with a legal obligation pursuant to Article 6 (1) (c) of the GDPR, which is defined in Sections 169-170 of Act CXXVII of 2007 on Value Added Tax.



Personal data processed to achieve the purpose of data processing	Invoicing name, invoicing address (country, postal code, city, name and nature of public space, house number, floor/door), invoice data.
Duration of the data processing	Pursuant to Section 169 (2) of Act C of 2000 on Accounting, 8 years from the publication of the annual financial statements, and if Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: PMT) Pursuant to Section 58 (1), the supervisory body specified in Section 5, the Financial Intelligence Unit, the investigating authority, the prosecutor's office and the court shall retain it for the period specified in the request, up to ten years from the termination of the business relationship or the execution of the transaction order.
Data transfer	<i>Recipient:</i> The Hungarian tax authority (National Tax and Customs Administration). <i>Purpose of data transfer:</i> Fulfillment of statutory data reporting obligation. <i>Legal basis for data transfer:</i> Compliance with a legal obligation pursuant to Article 6 (1) (c) of the GDPR, which was carried out by Act CXXVII of 2007 and Act 23/2014 (VI.30.) NGM Regulation.

### 3.5. Data processing for purposes other than those indicated in points 3.2 and 3.3 and 3.6.1. (preparation of statistical data)

The data subject	Persons identified as data subject under points 3.2 and 3.3, including point 3.3.1.
Purpose of the data processing	<ol style="list-style-type: none"> <li>1. Personal data processed by the Data Controller specifically in connection with ticket sales and/or ticket control may be used – according to various aspects – to generate statistical data, which may serve to base decisions related to the Data Controller's sales activities or the provision of services, or to measure the consequences of previous decisions.</li> <li>2. In addition, considering that the Company qualifies as an organization performing a public task, if the Data Controller receives a request for the release of data of public interest, the fulfillment of which can be achieved by preparing statistical data from personal data processed in connection with ticketing and/or ticket control activities, Infotv. may also use personal data relating to the data subject for this purpose. In all cases, statistical data are prepared in such a way that the data subject can no longer be identified afterwards.</li> </ol>
The legal basis of the data processing	<ol style="list-style-type: none"> <li>1. According to Article 6 (1) (e) of the GDPR, the Data Controller shall prepare statistical data from personal data processed in the course of its public task, i.e. ticket sales and ticket verification activities, which will facilitate and establish decisions regarding the development of its sales and verification activities and the provision of services.</li> <li>2. If the preparation of statistical data is necessary because it also qualifies as data of public interest and its release is carried out by Infotv., the legal basis for data processing is the performance of the public task of the controller pursuant to Article 6 (1) (e) of the GDPR.</li> </ol>
Personal data processed to achieve the purpose of data processing	<p>Personal data processed in connection with ticket sales and ticket control, from which the data subject cannot be directly identified.</p> <p>The Data Controller does not perform profiling, so the analysis of personal data is not individualized.</p>
Duration of the data processing	The Data Controller processes the personal data until the statistical data is prepared, after which the data subject cannot be identified either directly or indirectly from the statistical data.

### 3.6. Operation of the monitoring system related to online ticketing

The data subject	All person, who purchases a ticket on any interface of the Data Controller used for online ticket sales.
Purpose of the data processing	The sales and billing data generated during the sale by the Data Controller, recording any errors in a log file for the purpose of monitoring and analysing the errors and eliminating the detected errors, as well as if a claim is asserted by the data subject for any reason, the assessment of the claim.
The legal basis of the data processing	According to Article 6 (1) (e) of the GDPR, the performance of the Data Controller's public task, i.e. data processing is necessary, so the Data Controller has a legitimate interest in ensuring the smooth operation of its sales system, in particular in order to collect the fares set out in the Public Service Contract more efficiently, to monitor the errors that arise, to determine and carry out the measures necessary to eliminate the errors, and to properly and accurately investigate complaints sent to the Data Controller concerning the service.
Personal data processed to achieve the purpose of data processing	E-mail address used when logging in, notification e-mail address provided for purchases without registration, activities and times performed in the online ticketing system during purchase, IP address of the connected device.
Duration of the data processing	If the Online Ticket Purchase System works flawlessly or in the absence of customer comments on the given transaction, they will be automatically deleted within a maximum of 15 days from the date of purchase. In case of receipt of an error or complaint or comment related to a specific transaction, the monitoring data shall be stored by the monitoring system until the observation or complaint is investigated or the error is corrected.

#### 3.6.1. Data processing in connection with sending comments related to the use of the Online ticket sales interface (the "jegy.mav.hu" website and the "MAV application" and the "MAV+ application")

We inform the data subjects that the Data Controller's complaint handling activities are not carried out using the <https://jegy.mav.hu/feedback> page interface (see point 3.7). The <https://jegy.mav.hu/feedback> page interface is used exclusively to draw conclusions necessary to establish decisions on the operation of Online ticket sales interfaces and their future use.

The data subject	all natural persons who send their comments related to the operation of the Online ticket sales platforms on the <a href="https://jegy.mav.hu/feedback">https://jegy.mav.hu/feedback</a> page.
Purpose of the data processing	collecting and processing comments and detected errors related to the operation of the Online ticket sales platforms, drawing conclusions necessary to establish decisions on the future use of the Online ticket sales platforms.
The legal basis of the data processing	according to point e) of the Article 6 of the GDPR, the performance of the Data Controller's public task, i.e. data processing, is necessary for the Data Controller to ensure the smooth operation of its sales system in order to more effectively collect the fares set out in the Public Service Contract, to this end, it monitors any errors that arise, and to determine and take the necessary measures to eliminate the errors.
Personal data processed to achieve the purpose of data processing	the e-mail address of the data subject and the content of the report [category (design, price information, schedule data, payment, other), user environment, detailed description of the error or comment, suggestion, attachment of a screenshot].
Duration of the data processing	in the event of receipt of a comment, the data subject will store the data processed in connection with the notification of the comment for 1 year from the date of the notification.

### 3.7. Other data processing related to online ticket sales

The following data processing are closely related to online ticket sales performed by the Data Controller and to the Data Controller's service, in respect of which the Data Controller independently fulfils the information pursuant to Article 13

of the GDPR. Certain data management notices of the Data Controller are available on the <https://www.mavcsoport.hu/en/mav-szemelyszallitas/introduction/privacy-policy> website (Data protection/Privacy notices menu item).

- Data processing carried out by the Customer Service of MÁV Passenger Transport Co. in connection with written complaint handling and the assessment and fulfilment of refund/compensation claims;
- Data processing by the Customer Service of MÁV Passenger Transport Co. during the operation of the telephone complaint system (MÁVDIREKT);
- Data processing carried out by MÁV Passenger Transport Co. in connection with the management and enforcement of claims against passengers who do not pay the transfer fee or otherwise violate the travel conditions.

#### **4. Data subjects' rights and how to exercise them**

In particular, the data subject may exercise his or her data subject rights in a request submitted through the contact details of the Data Controller indicated in Section 1. We inform the data subject that the Data Controller may submit a request to exercise the right of the data subject at any of his contact details, however, we recommend that he or she do so via one of the contact details indicated in Section 1.

The Data Controller shall provide the information in writing, in an easily understandable form, within the shortest possible time from the submission of the request, but not later than within one month. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The controller shall inform the data subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay. The Data Controller shall primarily comply with the request of the data subject in the form requested by the data subject. If the data subject submitted the request electronically, the Data Controller shall provide the answer electronically, unless otherwise requested by the data subject.

The Data Controller shall ensure the exercise of the rights of the data subject free of charge. Where the request of the data subject is manifestly unfounded or excessive, in particular because of its repetitive character, the Data Controller may, taking into account the administrative costs involved in providing the requested information or communication or taking the action requested, charge a reasonable fee or refuse to act on the request. The Data Controller may refuse to comply with the request to exercise the rights of the data subject until it can be identified beyond doubt.

##### **4.1. Right of access and right to obtain a copy**

The data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed. Based on the right of access, the data subject has the right to obtain access to the personal data related to the ongoing data processing and to the following information about the purpose of data processing, the categories of personal data, the duration of data processing, who received or received the personal data of the data subject and for what purpose, his or her rights related to data processing, the right to lodge a complaint with a supervisory authority.

At the request of the data subject, the Data Controller shall provide him or her with a copy of the personal data undergoing processing, insofar as this does not adversely affect the rights and freedoms of others. For further copies requested by the data subject, the Data Controller may determine a reimbursement of costs.

##### **4.2. Right to amend, rectify and complete data**

The data subject may request the modification (correction) of inaccurate personal data concerning him or her or the completion of incomplete personal data through the contact details provided in point 1. The Data Controller shall notify the data subject of the rectification. If the data subject has an user account in the Data Controller's online ticketing systems, the data subject has the opportunity to modify the personal data recorded in the user account independently.

##### **4.3. Right to withdraw consent**

The data subject may withdraw his or her consent given pursuant to Article 6 (1) (a) of the GDPR without time limit at any of the contact details of the Data Controller, which shall not affect the lawfulness of data processing based on consent prior to its withdrawal. If the data subject withdraws his or her consent to data processing, the Data Controller shall delete the data of the data subject without delay and shall inform the data subject of the measures taken.

The data subject may withdraw his/her consent given within the framework of the data processing process indicated in Section 3.1 [registration on online ticketing platforms] at any time by deleting the user profile.

You may withdraw your consent given within the framework of the data processing process [GPS location positioning function] specified in point 3.2.1 at any time. We inform passengers that in the case of an electronic season ticket, the delay will be recorded in the MÁV+ application if the passenger has registered for the line in advance.

#### **4.4. Right to erasure of data ('right to be forgotten')**

The data subject may request the erasure of his or her personal data if the purpose of the processing no longer applies, if the data subject withdraws his or her consent, if the processing of the data is unlawful, if the specified time limit for storing the data has expired, if the data subject has objected to the processing of his or her personal data and there are no legitimate grounds for further processing; and if cancellation has been ordered by a court or authority. The Data Controller shall notify the data subject of the erasure of personal data. The Data Controller shall not delete personal data if they are necessary for compliance with a legal obligation to which the Data Controller is subject, as well as for the establishment, exercise or defence of legal claims.

We inform the data subject that the e-mail address and registration data provided for the non-activated registration will be deleted automatically 72 hours after sending the activation email.

We inform the data subject that deleting the user account associated with an activated registration can only be deleted in the following ways:

- in the case of the ticket purchase system accessible from the **MÁV Passenger Transport** website (jegy.mav.hu), after logging in, in the 'My profile' menu item, using the 'Delete account' function;
- within the MÁV application, within the MÁV+ application in the 'My Account' menu item, with the 'Delete Account' function.

We inform the data subject that the Data Controller deletes the user profile in the case of users who have been inactive for at least one year (have not logged in to the user profile for at least one year). 30 days prior to deletion, the Data Controller shall inform the data subject about the deletion at his registered e-mail address, after which the data subject has the opportunity to log in to the user profile, thus preventing deletion. If the data subject does not log in despite being informed, the Data Controller shall consider this as a withdrawal of consent to data processing and shall delete the user profile.

A deletion can only be initiated for a user account if all of the prize products contained in it have expired or been refunded. No deletion can be initiated for an account that contains valid or refundable prize products. If the data subject did not initiate the deletion of the user account from the MÁV application, from the MÁV application and/or logged in to his/her account on a phone other than the one from which the deletion was initiated, please use the 'Delete all data' function in the MÁV application and in the MÁV+ application in the 'Settings' menu or delete the MÁV application, the MÁV+ application from the given phone to delete the data stored on the phone. By pressing the Delete Account button, your registration e-mail address (User ID) will be subject to a deletion subscription, which means that your user account will no longer be available.

We inform the data subject that the Data Controller deletes the user profile of users who have been inactive for at least two years (have not logged in to the user profile for at least two years). The Data Controller shall inform the data subject about the deletion – 30 days before – at his registered e-mail address, after which the data subject has the opportunity to log in to the user profile, thus preventing deletion. The Data Controller shall send a reminder message to the data subject the day before the deletion. If the data subject does not log in despite being informed, the Data Controller shall consider this as a withdrawal of consent to data processing and shall delete the user profile.

#### **4.5. Restriction of processing**

The data subject may request at any contact details of the Data Controller that the processing of his or her personal data be restricted by the Data Controller if:

- contests the accuracy of the personal data (in this case, the restriction applies for the period during which the Data Controller verifies the correctness of the data);

- the processing is unlawful, but the data subject opposes the erasure of the data and requests the restriction of their use;
- the purpose of data processing has ceased to exist, but the data subject needs them for the establishment, exercise and defence of legal claims.

The restriction of data processing lasts as long as the reason indicated by the data subject requires it. In this case, personal data – with the exception of storage – shall only be processed with the consent of the data subject; or for the establishment, exercise or defence of legal claims; or to protect the rights of another natural or legal person; or for important reasons of public interest.

#### **4.6. Right to data portability**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided, in a structured, commonly used and machine-readable format, furthermore, the data subject have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where processing is based on a contract pursuant to point (a) of Article 6(1) or point (b) of Article 6(1) and the processing is carried out by automated means.

#### **4.7. Rights to object**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her based on Article 6 (1) (e) and (f) GDPR. This right can be exercised in the case of data processing specified in points 3.1.1. and 3.4 and 3.6 of this Privacy Policy. In that case, the controller shall no longer process the personal data unless there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. If the data subject objects to the Data Management contained in this Privacy Policy, the Data Controller shall individually examine the feasibility of fulfilling the request.

#### **4.8. Legal remedies**

##### **4.8.1. Right to lodge a complaint**

If the data subject does not agree with the data processing carried out by the Data Controller or believes that the data controller has violated one of his rights, he or she may lodge a complaint with the National Authority for Data Protection and Freedom of Information at any of the following contact details:

Name:	Hungarian National Authority for Data Protection and Freedom of Information
Headquarters:	1055 Budapest, Falk Miksa utca 9-11.
Postal address:	1363 Budapest, P.O.Box 9.
Telephone:	+36 (1) 391-1400 / +36 (30) 683-5969 / +36 (30) 549-6838
Telefax:	+36 (1) 391-1410
E-mail:	<a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>
Website:	<a href="http://www.naih.hu">www.naih.hu</a>

##### **4.8.2. Right to a judicial remedy**

If the data subject does not agree with the data processing carried out by the Data Controller or considers that the data controller has violated one of his rights, the data subject may also seek legal remedy directly against the Data Controller, which request shall be submitted to the court of the registered office of the Data Controller or the domicile or residence of the data subject. The court shall deal with the case as a matter of priority.

##### **4.8.3. Right to turn to the Data Controller**

If the data subject has any comments, objections or would like to request information about the processing of his or her personal data, he or she may do so at the [adatvedelem.szemely@mavcsoport.hu](mailto:adatvedelem.szemely@mavcsoport.hu) contact details. If you would like more information about the rights of data subjects provided by MÁV Passenger Transport Co., the method of exercising data subjects' rights and the details of the assessment of the request, please visit the <https://www.mavcsoport.hu/en/mav->



szemelyszallitas/introduction/rights-data-subject-and-their-enforcement website, where request forms are also available to facilitate the exercise of data subject's rights.

## **5. Legislation applied and referenced in the course of data processing**

In the course of its data processing processes indicated in Section 4 of this Privacy Policy, the Data Controller shall apply the following legal regulations:

- 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);
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information;
- Regulation (EU) 2021/782 of the European parliament and of the council of 29 April 2021 on rail passengers' rights and obligations;
- Act XLI. of 2012 on Passenger Services;
- Government Decree No 271/2009 (XII.1.) on the detailed conditions of rail passenger transport on the basis of a national operating licence;
- Act C of 2000 on Accounting;
- Act V of 2013 on the Civil Code;
- Act CXXVII of 2007 on Value Added Tax;
- Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing;
- Decree No 23/2014 of 30 December 2014 on the identification of invoices and receipts for tax administrations and on the tax authority control of invoices stored in electronic form NGM Regulation;
- Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC;
- Commission Delegated Regulation (EU) 2018/389 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards on strong customer authentication and common and secure open standards of communication.

**MÁV Transport Passenger Co.  
Data Controller**