

Privacy Policy on data processing by MÁV Passenger Transport Co. in connection with the issuance and verification of the solidarity ticket

(applicable from 5th of August 2025)

1. The Data controller's name and contact informations

MÁV Passenger Transport Private Company Limited by Shares

Headquarters: Üllői út 131. Budapest, H-1091, Hungary

Co.reg.no.: 01-10-045551

VAT number: 13834492-2-44

E-mail: eszrevetel@mavcsoport.hu

hereinafter: Data Controller

Contact details of the Data Protection Officer:

E-mail: adatvedelem.szemely@mavcsoport.hu

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

2. Information on individual data processing

The data subject	all natural persons who hold an identity document issued by an Ukrainian authority (identity card or passport, hereinafter referred to as „the .Document”) and present it to the Data Controller in order to issue a "solidarity ticket" entitled to use the domestic railway passenger transport service (hereinafter referred to as „the Service”) free of charge or who presents the solidarity ticket and the document when using the data controller's service (hereinafter referred to as: „the Data Subject”).
Purpose and method of the data processing:	the provision of the Data Controller's Service to the Data Subject free of charge, in this context the verification of the right to use the service and the issuance of the solidarity ticket. Data processing is carried out only through access (consultation) to the Document.
Legal basis of the data processing:	pursuant to Article 6(1)(e) of the General Data Protection Regulation (GDPR) of the European Union, the performance of the tasks of the Data Controller in the public interest, as defined in Article 7 (1) of the Act XLI of 2012 on Passenger Transport Services, and the 38/2024 (II. 29.) Governmental Regulation on Public transport travel discount.
Period of the data processing:	considering that the data processing takes place by inspecting the Document of the Data Subject, the duration of the data processing lasts until the inspection of the Document, i.e. the right to issue a solidarity ticket,
Persons entitled to access the data:	the employees entitled to issue and to check the lawfulness of using the solidarity ticket.
Obligation to provide personal data and consequences of failure to provide data:	the Data Subject is obliged to present an identity document issued by an Ukrainian authority in case of requesting the issuance of a solidarity ticket or free use of the Data Controller's Service. Failing this, the Data Controller will not be able to issue a solidarity ticket entitling to use the Service free of charge (i.e. the Data Subject can only use the Service in accordance with the Data Controller's General Terms&Conditions), and when using the Data Controller's Service, the Data Controller will not be able to verify that the solidarity ticket is used by the person entitled to do so.

The data processing concerning ticket sales (via online and via ticket office) are closely related to the ticket sales activity performed by the Data Controller. Certain data management notices of the Data Controller are available on the website <https://www.mavcsoport.hu/en/mav-szemelyszallitas/introduction/privacy-policy> (Data protection/Privacy notices menu item) under Points 2. and 4.

3. Data subjects' rights and how to exercise them

3.1. Right to request information

The data subject may request information in writing from the Data Controller through the contact details provided, may request the correction or deletion of their personal data, and may request the restriction of data processing. Upon request, the Data Controller provides information about the processed data, the purpose, legal basis, duration of the data

processing, the name, address (registered office) of the data controller, the name, address (registered office) of the data processor and its activities related to data processing, the contact details of the data protection officer, as well as who receives or has received the Data Subject's personal data and for what purpose, as well as the data subject's rights related to data processing, and the measures taken by the Data Controller.

The Data Controller shall provide the information in writing and in an easily understandable way as soon as possible after the request has been submitted, but no later than 1 month. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by a further two months. If the request for information is unsubstantiated or excessive, in particular due to its repetitive nature, the Data Controller may impose a fee or refuse to act on the request.

3.2. Right of access

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 processed personal data, the duration of data processing, recipients and purpose of data transport the data subjects' rights related to data processing, the right to submit a complaint to the supervisory authority.

At the request of the data subject, the Data Controller shall provide him or her a copy of the personal data subject of data 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.

3.3. Right to amend, rectify and complete data

The data subject may request that the Data Controller correct (amend) inaccurate personal data concerning him or her, and is also entitled to request that incomplete personal data be completed.

3.4. 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.

3.5. 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.

3.6. 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) GDPR. 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.

3.7. Legal remedies

3.7.1. 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: ugyfelszolgalat@naih.hu

Website: www.naih.hu

3.7.2. 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.

3.7.3. 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 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 the data subject's rights.

4. 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 Transport Services;
- Governmental Regulation No 271/2009 (XII.1.) on the detailed conditions of rail passenger transport based on a national operating licence.

**MÁV Transport Passenger Co.
Data Controller**