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### 1. PREAMBLE

The Data Management Principles and data management information sheets arising in connection with the data management of Győr-Sopron-Ebenfurti Railways Private Company Limited by Shares (H-9400 Sopron, Mátyás király u. 19, hereinafter referred to as GYSEV Zrt., or Data Manager) are available at <https://www2.gysev.hu/adatvedelem>. If you have any questions in this regard, please contact our Data Protection Officer (DPO) via the e-mail address [adatvedelem@gysev.hu](mailto:adatvedelem@gysev.hu) (+3699577305).

We reserve the right to change our Data Management Principles and data management information sheets and shall notify the Data Subjects of any changes in due time.

### 2. DEFINITIONS

Explanations of the terms used for this data management can be found in Section 2 of the Data Management Principles of GYSEV Zrt.

### 3. LEGAL BACKGROUND

The content of the Data Management Principles and data management information sheets issued by us is in accordance with the applicable legislation on data protection, so in particular with the following legislation regarding this data management:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 GDPR);
- Act CXII of 2011 – on information self-determination and freedom of information;
- Act LXVI of 1995 – on public documents, public archives and the protection of private archive material;
- Government Decree 335/2005. (XII. 29.) – on the general requirements for document management of bodies performing public duties;
- Act V of 2013 – on the Civil Code;

- Act XLI of 2012 – on passenger transport services;
- Government Decree 271/2009. (XII. 1.) – on the detailed conditions of rail passenger transport carried out on the basis of a national operating license;
- Government Decree 62/2013. (III. 4.) – on the protection of the rights of passengers using rail and bus passenger transport;
- Government Decree 85/2007. (IV. 25.) – on public passenger transport travel discounts;
- Act XLVIII of 2008 – about the basic conditions and certain limitations of economic advertising activity;
- Act CLXIV of 2005 – on commerce;
- Act CLV of 1997 – on consumer protection;
- KHEM Decree 57/2009. (X. 20.) – on certain rail travel discounts;

#### 4. RIGHTS OF DATA SUBJECTS

The Data Subject, i.e., you, can exercise your **right of access** in relation to the data that we manage about you, in connection with which, at your request, we will provide you with written information about the data managed by us, the purpose, legal basis and duration of data management, our activities related to data management, as well as who and for what purpose receive or have received your data.

You can request your personal data **be corrected** and, with the exception of mandatory data processing, data **to be deleted and “forgotten”**. Furthermore, you can **exercise your right to restrict the scope of data processing** as well as **object to** the processing of your personal data.

With your **right to data portability**, you can request that we release your personal data that you have provided to us so that you can forward this data to another Data Manager.

If we have requested your consent for the processing of your personal data, **you may withdraw this consent** at any stage of the data processing.

If you experience a violation of the law in relation to your data, you have the right **to go to court** and/or **go to authorities**, as well as **claim compensation and damages**.

The interpretation of these rights, as well as stakeholder rights that do not apply to this data management, but are related to our other data management, are contained in Section 4 of the Data Management Principles of GYSEV Zrt.

#### 5. RULES OF PROCEDURE, THAT IS HOW YOU CAN EXERCISE YOUR RIGHTS RELATED TO THE MANAGEMENT OF YOUR PERSONAL DATA:

You can send or submit your comments and requests regarding the handling of your personal data in writing at our contact details provided above or as indicated when recording the data.

We will inform you of the measures taken without undue delay, at the latest within one month of receipt of the request. If necessary, taking into account the complexity of the request and their number, this deadline can be extended by another two months.

If we do not take measures regarding your request without delay, but at the latest within one month from the receipt of the request, we must inform you of the reasons for the failure to take action, the possible extension of the deadline, and the fact that you can file a complaint with a supervisory authority and exercise your right to judicial remedy.

We provide you with the requested information free of charge. If your request is clearly unfounded, repetitive or excessive, taking into account the administrative costs associated with providing the requested information, we may charge a reasonable fee or refuse to take measures according to the request.

In our information provided to you, we may refer to a legal obligation, legal permission, legal restriction or any legal consequence by specifying the paragraph number and the section in question of the referenced legislation and citing the appropriate wording.

We inform all recipients of our correction, deletion or restriction of data processing, to whom we forwarded the personal data; unless this proves impossible or requires a disproportionate amount of effort. At your request, we will also inform you about these recipients.

The information we provide to you shall primarily be issued in electronic format, unless you request otherwise.

In the event of a violation of your rights, you, as the data subject, can apply to the competent court of your place of residence or temporary residence (<https://birosag.hu/>) or submit a complaint with the National Data Protection and Freedom of Information Authority:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Data Protection and Freedom of Information Authority)

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

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

#### **6. OTHER INFORMATION REGARDING THE HANDLING OF PERSONAL DATA:**

The details on our method used for storing personal data and the security of data management are contained in Section 6 of the Data Management Principles of GYSEV Zrt.

For the purpose of this data management, the data management of our activities is based on the following:

Section 5 of the Data Management Principles of GYSEV Zrt.

- a) Consent of the data subject, GDPR Art. 6. (1) lit. a);
- b) Contract performance, GDPR Art. 6. (1) lit. b);
- c) Compliance with a legal obligation to which the controller is subject, GDPR Art. 6. (1) lit. c);
- d) Legitimate interests pursued by the controller, GDPR Art. 6. (1) lit. f);

If the data processing is based on your consent, we can process the recorded data without your further separate consent, and also after the withdrawal of your consent, if this is necessary for the purpose of fulfilling a legal obligation or for the purpose of asserting the legitimate interest of a person other than you or us.

Your personal data will only be transferred to a third party if required by law, or if you have given your consent in advance after being properly informed.

We do not use personal data for purposes other than those indicated. Our employees can handle them only to the extent and for the time absolutely necessary to perform their tasks.

In certain cases, the management, storage and transmission of a part of the data provided is made mandatory by law, of which we notify our partners separately.

## 7. HANDLING DATA REQUESTS OF COURTS, PUBLIC PROSECUTORS'S OFFICE, INVESTIGATIVE BODIES AND AUTHORITIES AND OF OTHER DATA PROCESSING

We inform you that courts, the Public Prosecutor's Office, investigative bodies, infringement authorities, the public administrative authority, the National Data Protection and Freedom of Information Authority as well as other bodies authorized by relevant legislation, may contact us as Data Manager in order to provide information or data, transfer data or make documents available for them.

We provide only as much personal data to the authorities – provided they have indicated the exact purpose and the scope of the data – resp. only to the extent that is absolutely necessary to fulfil the purpose of the request.

We provide information on data processing not listed in our Data Management Principles and data management information sheets when the data is collected.

## 8. DATA MANAGEMENT OF OUR WEBSITE AND SOCIAL MEDIA APPEARANCES

When visiting the website <https://www2.gysev.hu/>, the web server automatically logs the activity of the visitor and, if applicable, your activity. The web page is also equipped with google analytics code, so when you visit it, it automatically logs and compiles aggregated statistics on user activity, including your activity where appropriate. Because of the latter, it is not possible to accurately track the user, i.e., you, in Google Analytics.

As a business organization, GYSEV Zrt. also operates a Facebook page and Instagram for the purpose of promoting its activities, providing information about the organization itself and its activities, and conducting marketing activities.

Our company does not connect the data generated during the analysis of the log files with other information, and does not seek to identify the user, i.e., you.

Other data protection information related to the data management of our website, Facebook page and Instagram can be found in Section 8 of the Data Management Principles of GYSEV Zrt.

## 9. CONTACT –CUSTOMER CORRESPONDENCE

All e-mails received by us with the sender's name, e-mail address, date, time and other personal data provided in the message will be deleted after a maximum of 3 years from the date of communication.

Since GYSEV Zrt. is covered by Act LXVI of 1995 and Government Decree 335/2005, we, as recipients, keep all letters received by us with the sender's name, address and date of receipt for the period specified in GYSEV Zrt.'s Document Management and Administration Regulations, and will, according to the aforementioned legislation, delete these letters or hand them over to the Hungarian National Archives, State Archives (H-Budapest, I., Bécsi kapu tér 2-4. [www.mnl.gov.hu](http://www.mnl.gov.hu)).

## 10. DATA PROCESSES RELATED TO THE SUBJECT

### 10.1. ELECTRONIC COMMUNICATION WITH PASSENGERS IN INTERNATIONAL TRAFFIC

*The purpose of the data management process:* When purchasing an international ticket, GYSEV Zrt. provides the opportunity for the customer to provide an e-mail address so that GYSEV Zrt. can electronically send information via e-mail to the person concerned about incidents relating to his/her trip that prevent GYSEV Zrt. from rendering a smooth service, and the consequences of these incidents on the trip.

*Scope of data subjects:* The natural person whose e-mail address is provided by the person buying the ticket during the purchase of an international ticket at the ticket office of the Data Manager or a third party selling the Data Manager's products (hereinafter: data subject). The person who bought the ticket or the person whose e-mail address is given by the person who bought the ticket can be considered a data subject.

*Source of the data processed:* The person purchasing a ticket

*Scope of data processed: (by indicating the purposes of data management, the legal bases listed above and the duration of data management):*

Scope of data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing	What do we use the data for?	Data communication / data transmission and its legal basis
E-mail address, route of the international trip (departure and arrival station), date of travel (start and end of validity), train no. and train type concerned	<ul style="list-style-type: none"> <li>For the purpose of giving information by e-mail about incidents involving international travel,</li> <li>Determination of retention period</li> </ul>	<ul style="list-style-type: none"> <li>d) Asserting the legitimate interests of the Data Manager (economic interest, increasing passenger satisfaction)</li> <li>d) Enforcement of the legitimate interests of the ticket purchaser or the persons traveling on the given international route (right to information)</li> </ul>	<ul style="list-style-type: none"> <li>Until midnight on the day of validity of the purchased international ticket.</li> <li>Until the date of refund of the international ticket</li> <li>Until withdrawal of consent</li> </ul>	<ul style="list-style-type: none"> <li>By electronic mail: definition of addressee and content</li> </ul>	<ul style="list-style-type: none"> <li>n.a.</li> </ul>

Scope of data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing	What do we use the data for?	Data communication / data transmission and its legal basis
E-mail address	Sending an e-mail to the person concerned that his/her e-mail address has been recorded for passenger information purposes	<ul style="list-style-type: none"> <li>d) Asserting the legitimate interests of the Data Manager (information obligation)</li> <li>d) Asserting the Data Subject's legitimate interests (possibly the unauthorized disclosure of the e-mail address, as a screening for abuse)</li> </ul>		<ul style="list-style-type: none"> <li>By electronic mail: addressee</li> </ul>	

*Brief description of the interest assessment test for the Data Subject:* Our company has a clear interest in data processing justified by the legal basis of assertion of legitimate interests as indicated in the above table and in increasing passenger satisfaction. Sending information electronically about incidents affecting international travel is an important economic interest of us. It is also in our legitimate interest to send the data subject information about the management of his/her e-mail address. It is the legitimate interest of the person buying a ticket or traveling internationally to receive adequate information about the events that affect their international travel as well as about the provision of their e-mail address in order to filter out abuses. We have prepared an interest assessment test for such data management, as a result of which it could be established that such data management does not pose great harm to the interests of the Data Subject.

Method of data processing: electronic

*Person entitled to know/handle the personal data:* Regulatory Expert, Chief Regulatory Expert, Operations Manager

*Data processors:*

Name	Registered seat	Data processing task	Contact information for its data protection
MÁV-START Vasúti Személyszállító Zrt.	1087 Budapest, Könyves Kálmán krt. 54-60.	JÉ-system, as an IT-system and communications application used for passenger information, ticket sales and for operation of a server service to store related data. By order of GYSEV Zrt., providing information	





## Győr – Sopron - Ebenfurti Vasút

Zártkörűen Működő Részvénytársaság

### ADATKEZELÉSI TÁJÉKOZTATÓ

a nemzetközi viszonylatban történő utazást érintő  
eseményekkel kapcsolatosan végzett utastájékoztatással  
összefüggő adatkezelésről

Dátum:  
2023.10.17.  
Ügyiratszám  
G-016898/2023  
Változatszám:  
1.

anno 1872

		to the data subject on behalf of GYSEV Zrt. on travel information related to train traffic.	

*Data transmission to a third country or to an international organization:* n.a.

*Automated decision-making, profiling:* n.a. in relation to data management

*Possible consequences of failure to provide data:* The person concerned will not receive a notification about the disruption of the service affecting his/her trip

GYSEV Zrt.