

Privacy Policy concerning data processing in relation to the use of the BKK Online Customer Feedback Interface (website)

Pursuant to Articles 13 and 14 of 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, hereinafter referred to as **GDPR**), BKK Centre for Budapest Transport (hereinafter referred to as **BKK**) as Data Controller provides the following information to data subjects on the use of the BKK Online Customer Feedback Interface (website).

The purpose of this Privacy Policy (hereinafter referred to as **Privacy Policy**) is to provide information in an understandable way in relation to the use of the BKK Online Customer Feedback Interface (website) to data subjects about the basic principles of processing personal data carried out by BKK, about the rights of data subjects as well as about key data management rules. Data Controller reserves the right to the unilateral modification of the Privacy Policy, in which case Data Controller must indicate the amendments, if they affect data subject information, in the Privacy Policy or publish the new and effective Privacy Policy on its website.

1. DATA CONTROLLER

Data Controller's name	BKK Budapesti Közlekedési Központ Zártkörűen Működő Részvénytársaság
Company seat	1075 Budapest, Rumbach Sebestyén utca 19–21.
Data Protection Officer's name	dr. Miklós Pálvölgyi
Data Protection Officer email	adatvedelem@bkk.hu
Phone number (customer service)	+36-1-3-255-255
Access to data protection documentation	https://bkk.hu/en/about-bkk/data-management-information/

For the purposes of this document, personal data is any information relating to an identified or identifiable natural person (**'data subject'**). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The data subjects of the personal data processing according to this document are in particular those natural person customers who register to use the **BKK Online Customer Feedback Interface**.

2. DATA PROCESSING OPERATIONS

Scope of processed data	Purpose of data processing	Legal basis of data processing	Duration of of data processing
Name, email address	Providing the possibility of communication related to the management of feedback made through the online reporting interface, maintaining contact, sending responses to queries	Data subject's consent [GDPR Article 6 (1) a] Possible consequences of the absence of data provision: failure to respond to a query received via the online customer feedback interface	<p>Until the purpose of the data processing has been achieved, but for a maximum of 5 years from the date of data recording/until consent is withdrawn, or, in the absence of such withdrawal, if a contract has been concluded, for the entire retention period of the contract (i.e. 8 years after the year of adoption of the annual report for the year of the last accounting document related to the contract, which also constitutes the termination of the contract, pursuant to Section 169 (2) of the Accounting Act. If a contract is not concluded (if there is no other legal basis for the processing of personal data by BKK), the personal data and the documentation containing it will be deleted/anonymised/destroyed without delay.</p> <p>The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.</p>
Bank account number and account holder's name	Management of legitimate claims for refund relating to the operation of ticket vending machines (TVMs)	Possible consequences of the absence of data provision: failure to meet a legitimate refund claim received via the online customer feedback interface	<p>Until the purpose of the data processing has been achieved, but for a maximum of 5 years from the date of data recording/until consent is withdrawn, or, in the absence of such withdrawal, if a contract has been concluded, for the entire retention period of the contract (i.e. 8 years after the year of adoption of the annual report for the year of the last accounting document related to the contract, which also constitutes the termination of the contract, pursuant to Section 169 (2) of the Accounting Act. If a contract is not concluded (if there is no other legal basis for the processing of personal data by BKK), the personal data and the documentation containing it will be deleted/anonymised/destroyed without delay.</p>

			The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.
Scope of processed data	Purpose of data processing	Legal basis of data processing	Duration of of data processing
BKK ID and telephone number	Ensuring that a complaint about a purchase in the mobile ticket app can be investigated	Possible consequences of the absence of data provision: failure to investigate a complaint received via the online customer feedback interface	<p>Until the purpose of the data processing has been achieved, but for a maximum of 5 years from the date of data recording/until consent is withdrawn, or, in the absence of such withdrawal, if a contract has been concluded, for the entire retention period of the contract (i.e. 8 years after the year of adoption of the annual report for the year of the last accounting document related to the contract, which also constitutes the termination of the contract, pursuant to Section 169 (2) of the Accounting Act. If a contract is not concluded (if there is no other legal basis for the processing of personal data by BKK), the personal data and the documentation containing it will be deleted/anonymised/destroyed without delay.</p> <p>The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.</p>
Data collected by the cookies used	Interactive use of the content available on BKK's website of the service, informing those interested in the service about the service, its essential conditions and other facts and circumstances related to the performance of BKK's tasks	Data subject's consent [GDPR Article 6 (1) a)]	90 days for the cookies

3. YOUR RIGHTS AS A DATA SUBJECT AND HOW TO EXERCISE THOSE RIGHTS:

Data Controller shall inform the data subject through the contact channels provided by him or her without undue delay, and in any event one month of receipt of data subject's request about action taken on the request submitted in line with the information below. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of data subject's request together with the reasons for the delay.

You, as a data subject, have the following options to exercise your rights below:

Your right to be informed

You may request information in writing from Data Controller regarding the following:

- what personal data
- on what legal basis
- for what data processing purpose
- from what source
- for what period will be processed
- if a Data Processor is employed, and if yes, the name, address and data processing activity of the Data Processor
- to whom, when, based on what legislation Data Controller has given access to what personal data or to whom data have been transferred
- about the circumstances and effects of a data protection incident and the preventive measures taken

In person:

At [BKK Customer Service Centres](#)

By telephone:

BKK Call Centre **+36 1 325 52 55**

In writing to BKK Customer Service:

- letter addressed to **1075 Budapest, Rumbach Sebestyén u. 19-21.**
- email address: bkk@bkk.hu or adatvedelem@bkk.hu

Your right of access

You shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

- f) the right to lodge a complaint with a supervisory authority (in Hungary it is the National Authority for Data Protection and Freedom of Information);
- g) where the personal data are not collected from you, any available information as to their source;
- h) the existence of automated decision-making, including profiling and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Data Controller shall provide a copy of your personal data undergoing processing. For any further copies requested by you, BKK may charge a reasonable fee based on administrative costs. If you make the request by electronic means, the information shall be provided in a commonly used electronic form, unless you request it otherwise. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Your right to rectification

You shall have the right to obtain from Data Controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Your right to erasure ('right to be forgotten')

You as a data subject shall have the right to obtain from Data Controller the erasure of personal data concerning you. Data Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) you withdraw consent on which the processing is based and where there is no other legal ground for the processing;
- c) you object to the processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority or to processing necessary for the legitimate interests pursued by the controller or by a third party, and there are no overriding legitimate grounds for the processing, or you object to the processing for direct marketing purposes;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law (Hungarian law) to which the Data Controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

Data Controller is not in a position to grant your request to erase data in cases where data processing is carried out:

- g) for compliance with a legal obligation, or
- h) for the establishment, exercise or defence of legal claims.

Your right to restriction of processing

You as a data subject shall have the right to obtain from Data Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by you, for a period enabling BKK to verify the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- c) Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the you for the establishment, exercise or defence of legal claims, or
- d) you have objected to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority, or to processing necessary for the legitimate interests pursued by Data Controller or by a third party, pending the verification whether the legitimate grounds of BKK override yours.

Where processing has been restricted based on the above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. You as a data subject who has obtained restriction of processing shall be informed by BKK before the restriction of processing is lifted. The restriction shall apply until the reason indicated by you renders data storage necessary. You may request restriction of processing in case, for instance, you believe that Data Controller has unlawfully processed your data, however it is necessary for authority or judicial proceedings initiated by Data Controller that those data are not deleted by Data Controller. In these cases, Data Controller shall continue to store data until the official request by an authority or court of law is received; deletion will be performed thereafter.

Your right to object

The data subject shall have the right to object in writing to processing of personal data concerning him or her which is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. The controller shall no longer process the personal data unless the controller demonstrates 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.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Your right to data portability

You as a data subject shall have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent or on a contract and
- b) the processing is carried out by automated means.

In exercising your right to data portability, you as a data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The exercise of the right to data portability shall be without prejudice to the right to erasure. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The right to data portability shall not adversely affect the rights and freedoms of others.

Your right to legal remedy

Contacting the Data Controller

Before initiating a procedure by a law court or authority, we recommend you send your complaint or query about the processing of your personal data to Data Controller, so that we can investigate and remedy it in a satisfactory manner, or fulfil your justified request.

Data Controller shall investigate, take action and provide information to data subject without undue delay and within the legally prescribed timeframe in the event data subject exercises his or her right in connection with the data processing, requests information about the data processing, objects to, or complains about the data processing. If needed, the time limit can be extended in a legally specified way, taking into account the complexity and number of the queries.

If the data subject lodged the query electronically, the response will also be given that way, unless data subject requests it otherwise. If Data Controller does not take action based on data subject's query without undue delay, but within the legally specified time limit, Data Controller shall notify data subject about the reasons of absence of action, or of the refusal to fulfil the request, and whether Data Subject can launch a procedure by a court or an authority in the specific case.

In order to exercise your rights concerning data processing, or in case have any questions or concerns with regard to your data managed by Data Controller, or if you need information about your data, or wish to file a complaint, you may turn to Data Controller using the contact details listed in this Privacy Policy.

Launching a proceeding before a court of law

Data Subject may turn to a court of law against Data Controller or data processor – in connection with data processing falling within its scope of activity – if he or she believes that Data Controller or its commissioned data processor has infringed the provisions concerning the processing of personal data specified in legislation or in a mandatory legal act of the EU, while processing Data Subject's personal data.

Settlement of the lawsuit is in the power of the tribunal. The lawsuit can also be launched before the tribunal competent according to the residence or location of the Data Subject, at Data Subject's discretion.

If you believe that Data Controller has processed your data unlawfully, you shall have the right without prejudice to any administrative or judicial remedies, in particular in the Member State

of your habitual residence, place of work or place of the alleged infringement, to file a complaint with the **National Authority for Data Protection and Freedom of Information (NAIH)** located at 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9., email: ugyfelszolgalat@naih.hu, phone :+36 1 391 1400, fax.:+36 1 391 1410, website: www.naih.hu), if in your opinion Data Controller has restricted you in exercising your rights or denied your request to exercise those rights (initiating an investigation), and if you believe Data Controller or its commissioned data processor has infringed the provisions concerning the processing of personal data specified in legislation or in a mandatory legal act of the EU (request to conduct proceedings by an authority).

You can also start a civil lawsuit against BKK. Settlement of the lawsuit is in the power of the tribunal, i.e., of The Budapest Tribunal, which is competent based on the location of BKK's registered company seat. You can also launch the lawsuit before the tribunal competent according to your place of residence.

Miscellaneous provisions

No automated decision-making including profiling is performed in the course of data management detailed in this Privacy Policy.