

Privacy Policy
to sell and buy products online
through the website www.mollimo.hu

Name and purpose of data processing	Legal basis for data processing	Scope of processed data	Duration of data processing	Recipient of data transfer	Data processor and data processing activity
<p>Electronic contracting, invoicing and keeping contact</p> <p>The data management information on the use of the car sharing service can be found at the following link: https://www.mollimo.hu/hu/legal</p>	<p>Fulfilling the contract pursuant to Article 6 (1) (b) of the GDPR</p> <p>In addition, the data processing is data processing pursuant to Article 13/A (1)-(9) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.</p> <p>Invoicing: Data processing in accordance with § 165 through 169 of Act C of 2000 on Accounting and § 77 through 78 and 202 of Act CL of 2017 on the</p>	<p>Customer's full name: surname, first name, e-mail address (in case of credit purchase, only the e-mail address registered in the Customer's Limo telephone application), telephone number (optional)</p> <p>Billing information: billing name, billing address, tax number</p> <p>Bank card details: bank card name, bank card number, expiration date, security code</p> <p>Bank card data are not transferred to</p>	<p>The data will be deleted within 30 days of order fulfillment.</p> <p>Billing information will be stored until the deadline required by applicable law.</p> <p>(In accordance with § 165 through 169 of Act C of 2000 on Accounting and § 77 through 78 and 202 of Act CL of 2017 on the Rules of Taxation.)</p> <p>The privacy policy for the use of the car sharing service is available at the following link: https://www.mollimo.hu/hu/legal</p>	<p>MOL Plc. (1117 Budapest, Október huszonharmadika u. 18.), MOL Limo and MOL Plc. are considered joint data controllers.</p>	<p>VULOG S.A., The Crown, 21, Avenue Simone Veil, 06200 Nice, France - the provision of ancillary services closely related to data processing; server service company contracted with VULOG S.A. for the provision of server services: SAS OVH, 2 rue Kellermann - 59100 Roubaix - France</p> <p>The processing of data by Vulog only occurs when the gift voucher or credit</p>

	Rules of Taxation.	MOL LIMO; they are handled exclusively by the financial service provider.			<p>purchased by the Customer is used in the phone application.</p> <p>MOL GBS Magyarország Kft. (1039 Budapest Szent István utca 14.) - the provision of ancillary services closely related to data management, billing processes</p> <p>OTP Mobil Kft. (1143 Budapest, Hungária krt. 17-19.) - operating an online payment system, providing ancillary services closely related to data management, server services</p> <p>KMAK Kft. (5000 Szolnok, Boldog Sándor István krt. 4. III / 333.) - the provision of ancillary services</p>
--	--------------------	---	--	--	---

					closely related to data processing, server services
<p>Handling of complaints</p> <p>The privacy policy for customer service communications is available at the following link: https://www.mollimo.hu/hu/legal</p>	<p>Data processing in accordance with Article 17/A (4)-(5) of Act CLV of 1997 on Consumer Protection (hereinafter: the "Act on Consumer Protection").</p>	<p>Customer's full name: surname, first name, telephone number, e-mail address, home address, billing address and the content of the complaint report - depending on the way the complaint is received by the customer service.</p>	<p>3 years from the date of the complaint. Under Article 17/A(7) of Act CLV of 1997 on Consumer Protection, the business entity is to keep the record of the complaint and a copy of the response for 3 years, and present it to the supervisory authorities upon request.</p>		
<p>Enforcement of legal claims</p>	<p>The data controller's legitimate interest is consent pursuant to Article 6 (1) (f) of the GDPR.</p> <p>The balancing test shall be made available, upon request, by the data controller.</p>	<p>Customer's name: surname, first name, e-mail address, telephone number</p>	<p>The Data Controller will store the data for 5 years from the date of the order in the event of a legitimate claim.</p> <p>In the event that the competent bodies initiate proceedings in connection with the contract or the Data Controller initiates proceedings, the data will be stored until the proceedings are finally terminated.</p>		

The data processing information on the use of MOL LIMO car sharing service is available at the following link:

<https://www.mollimo.hu/hu/legal>

The data processing information on communication with MOL LIMO customer service is available at the following link:

<https://www.mollimo.hu/hu/legal>

Name, registered office, telephone number, website (where privacy notices are available) and e-mail address of data controllers:

- Data Controller #1: MOL Limitless Mobility Kft. (1117 Budapest, Október huszonharmadika u. 18.), tel.: (36) 1 886-4444; website: www.mollimo.hu, e-mail: info@mollimo.hu
- Data Controller #2: MOL Plc. (1117 Budapest, Október huszonharmadika u. 18.)

Data controllers (#1 and #2) are considered as joint controllers, whereby they jointly determine the purposes and scope of data processing, and they are jointly responsible for the data processing. The controllers have a joint privacy policy.

Contact person(s) of the Data Controller(s):

- Data Controller #1: MOL Limitless Mobility Kft. - info@mollimo.hu
- Data Controller #2: MOL Plc. - ugyfelszolgasat@mol.hu

Name and contact details of the Data Protection Officer(s) at the Data Controller:

- Data Controller #1: MOL Limitless Mobility Kft. - dpo@mol.hu
- Data Controller #2: MOL Plc. - dpo@mol.hu

Those entitled to access data at the Data Controller (per processing purpose):

- Data Controller #1: MOL Limitless Mobility Kft. - Managers, Operations Manager, Fleet Operator, Customer Service Representative, Sales and Marketing Manager, Project Manager, Customer Relationship Manager

- Data Controller #2: MOL Plc. - project manager, product coordinator, technical expert, legal advisor, sales manager, business development and project management expert, IT manager, application development expert, IT experts, assistant, purchaser, purchasing manager, customer service representative, accounting expert, tax expert, accounting and tax manager, financial expert, back office staff member, innovation expert

Name, address, telephone number, website (where the privacy notice is available) and e-mail address of the Data Controller(s) and other data controller recipient(s):

- **Vulog SA**, The Crown, 21, Avenue Simone Veil, 06200 Nice, France - provision of ancillary services closely related to data management, server service, contact@vulog.com, www.vulog.com
- Company contracted with Vulog SA to provide server services: **SAS OVH**, 2 rue Kellermann - 59100 Roubaix - France
- **OTP Mobil Kft.** (1143 Budapest, Hungária krt. 17-19.) - operation of an online payment system, provision of additional services closely related to data management, server service
- **KMAK Kft.** (5000 Szolnok, Boldog Sándor István krt. 4. III./333.) - provision of additional services closely related to data management, server service
- **MOL GBS Magyarország Kft.** (1039 Budapest Szent István utca 14.) - provision of additional services closely related to data management, provision of invoicing processes

Contact person(s) of the Data Processor(s) and other data controller recipient(s):

- **Vulog SA:** contact@vulog.com, www.vulog.com
- **SAS OVH:** www.ovh.com
- **OTP Mobil Kft:** ugyfelszolgalat@simple.hu
- **MOL GBS Magyarország Kft.:** GBS_Info@MOL.hu
- **KMAK Kft.:** info@kma.hu

Name and contact details of the Data Protection Officer(s):

- **Vulog SA:** contact@vulog.com, www.vulog.com
- **SAS OVH:** www.ovh.com
- **OTP Mobil Kft:** ugyfelszolgalat@simple.hu
- **MOL GBS Magyarország Kft.:** GBS_Info@MOL.hu
- **KMAK Kft.:** info@kma.hu

Those entitled to access the data at the Data Controller:

- Vulog SA: support staff for the service in question

- **SAS OVH:** support staff for the service in question
- **OTP Mobil Kft:** employees providing support in connection with the given service
- **MOL GBS Magyarország Kft.:** employee providing support in connection with the given service
- **KMAK Kft.:** employee providing support in connection with the given service

Processing of special personal data for the purpose specified in this Privacy Policy: does not take place.

Description of the data management process: MOL Limitless Mobility Ltd. sells products to Customers through its website www.mollimo.hu. During the purchase process, the Customer must provide the data indicated above in order for the Data Controller to deliver the product to the right person, to the right delivery address, and to the right e-mail address. In the case of gift vouchers and credit purchases, the promotional code on the voucher and the purchased credit can be used through the Controller's (MOL Limo) phone application when using the car sharing service. In the case of credit purchase, the Customer must provide his/her name and e-mail address registered in the phone application in order to be properly identified and for whom the Data Controller can credit the purchased credits in his/her profile in the phone application.

Transfer of data to a third country: does not take place.

Data security measures:

Information security management system	To ensure the confidentiality, integrity and availability of organizational information by implementing policies, processes, process descriptions, organizational structures, software and hardware functions.
Physical access	To ensure the protection of physical assets that contain data about the MOL Group.
Logical access	To ensure that only approved and authorized users have access to data used by MOL Group companies.
Data access	To ensure that only persons authorized to use the systems have access to MOL Group's company data.
Data transmission / storage / destruction	To ensure that MOL Group company data cannot be transmitted, read, modified or deleted by unauthorized persons during transmission or storage. In addition, ensure the immediate deletion of MOL Group Corporate Data when the purpose of the processing ceases.
Confidentiality and integrity	To ensure that MOL Group's corporate data is processed and updated in a confidential manner and in order to preserve its integrity.
Availability	To ensure that MOL Group corporate data is protected from accidental destruction or loss and that timely access to and recovery of the relevant MOL Group corporate data in the event of events resulting in these consequences.
Data separation	To ensure that data of MOL Group companies is treated separately from data of other customers.
Incident management	In the event of any breach of MOL Group corporate data, the impact of the breach should be minimized, and the owners of MOL Group corporate data should be notified immediately.
Audit	To ensure that the processor regularly tests, reviews and evaluates the effectiveness of the technical and

organizational measures outlined above.

Your rights in connection with data processing:

Your data protection rights and remedies and their limitations are set out in detail in the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You may request information about your data at any time, request the rectification, erasure or restriction of processing of your data, furthermore, object to processing based on legitimate interest and to the sending of direct marketing messages, and have the right to data portability. The most important provisions are summarized below.

Right to information:

If the Data Controller processes personal data relating to you, the Data Controller is obliged to provide you with information, even without your request, on the most important features of the processing, such as the purpose, legal basis, duration, identity and contact details of the Data Controller and its representative, the recipients of the personal data (with appropriate and suitable safeguards in the case of transfers to third countries), the legitimate interests of the Controller and/or third parties in the case of processing based on legitimate interests, and your rights and remedies (including the right to lodge a complaint with a supervisory authority) in relation to the processing, if you do not already possess this information. The controller provides this information by making this notice available to you.

Right of access:

You have the right to receive feedback from the Data Controller on whether or not your personal data are being processed and, if such processing is ongoing, the right to access your personal data and certain information relating to the processing, including the purposes of the processing, the categories of personal data concerned, the recipients of the personal data, the (envisaged) duration of the processing, the rights and remedies of the data subject (including the right to lodge a complaint with a supervisory authority) and, where the data are collected from the data subject, information on the source of the data. Upon your request, the Data Controller will provide you with a copy of the personal data which are the subject of the processing. For additional copies requested by you, the Controller may charge a reasonable fee based on administrative costs. The right to request a copy must not adversely affect the rights and freedoms of others. The Controller will provide you with information on the possibility of obtaining a copy, the method of obtaining a copy, the possible costs and other details upon your request.

Right to rectification:

You have the right to have inaccurate personal data relating to you corrected by the Data Controller without undue delay upon your request. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

Right to erasure:

You have the right to have personal data concerning you erased by the Data Controller without undue delay upon your request, and the Data Controller is obliged to erase personal data concerning you without undue delay if certain conditions are met. Among other things, the Controller is obliged to delete your personal data at your request if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; if you withdraw your consent on the basis of which the data are processed and there is no other legal basis for the processing; or if the personal data have been unlawfully processed; or you object to the processing and there is no overriding legitimate ground for the processing; the personal data must be erased in order to comply with a legal obligation under Union or Member State law applicable to the Data Controller; the personal data were collected in connection with the provision of information society services.

If the data processing is based on your consent, the consequence of withdrawing your consent is as follows:

If you withdraw your consent to the processing of your personal data in relation to your participation in the prize draw, your personal data will be deleted, and your participation in the prize draw will unfortunately not be possible.

Please, be informed that the withdrawal of your consent does not affect the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal.

Right to restrict data processing:

You have the right to have the Data Controller restrict data processing at your request if one of the following conditions is met:

- a) You dispute the accuracy of the personal data, in which case the restriction applies to the period of time that allows the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and you object to the deletion of the data and instead request a restriction on their use;
- c) the Data Controller no longer needs the personal data for the purpose of data processing, but you request them in order to make, enforce or protect legal claims; or

- d) You have objected to the data processing; in this case, the restriction applies for as long as it is determined whether the legitimate reasons of the Data Controller take precedence over your legitimate reasons.

If the data processing is restricted on the basis of the above, such personal data may be processed, except for storage, only with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

In the event of the lifting of the restriction, the Data Controller will inform you in advance.

The right to data portability shall not prejudice the provisions governing the right to erasure and shall not adversely affect the rights and freedoms of others.

Right to object:

You have the right to object, at any time, on grounds relating to your particular situation, to the processing of your personal data based on the legitimate interests of the Data Controller. In such a case, the Data Controller may no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the data processing, which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

The framework to exercise rights:

The Data Controller shall inform you of the action taken on your request concerning your rights listed above without undue delay and in any event within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Data Controller shall inform you of the prolongation of the deadline, stating the reasons for the delay, within one month of receipt of the request. If the Data Controller does not take action on your request, it shall inform you without delay, but at the latest within one month of receipt of the request, of the reasons for the failure to take action and of your right to lodge a complaint with the competent data protection supervisory authority (in Hungary, the National Authority for Data Protection and Freedom of Information; "NAIH") and to exercise your right to legal remedies. The contact details of the NAIH, 1125 Budapest Szilágyi Erzsébet fasor 22/C., Tel: +36 1 391 1400, Fax: +36-1-391-1410, Email: ugyfelszolgalat@naih.hu, website: <http://naih.hu/>

You can go to court if your rights are violated. The trial falls within the jurisdiction of the tribunal. The action may, at the option of the person concerned, also be brought before the court of the place where the person concerned is domiciled or resident. The court may oblige the Data Controller to provide the information, to correct, limit or delete the data, to annul the decision made by the automated data processing, and to take into account your right to protest. The court may order the publication of its judgment in such a way that the Data Controller or any other data controller and the breach committed by it can be identified.

You may seek compensation from the data controller responsible for the damage caused by the unlawful data processing (including failure to take data security measures). If the data controller violates your privacy rights by unlawfully processing your data or violating data security requirements, you may claim damages from the data controller. The controller shall be released from liability if it proves that the damage or the violation of the data subject's right to privacy was caused by an unavoidable cause outside the scope of data processing.

No compensation shall be payable and no damages shall be recoverable in so far as they result from the intentional or grossly negligent conduct of the injured party.