

**NOTICE ON THE PROCESSING OF PERSONAL DATA**  
**FOR PERSONS ENTERING NTPS PLC'S REGISTERED OFFICE**

**Dear Customer,**

This Notice was designed to provide all relevant information to persons ("the Data Subjects") visiting or working at the registered office of NTPS Plc. ("the Company") at H-1134 Budapest, Váci út 45, Building B, hereinafter referred to as "the Main Office" in connection with the recording of data on behalf of NTPS Plc. ("the Controller") at the reception at Gates A and B to the Main Office and the camera surveillance through the CCTV surveillance system installed at the Main Office on behalf of the Controller ("Processing").

**I. Legal background:**

In the course of its data processing, NTPS Plc. is required to conform to the provisions of the Act CXII of 2011 on the Right to Informational Self-determination and on the Freedom of Information ("the Privacy Act"), as well as 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), Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators ("the Security Services Act") and other provisions of civil law.

**II. Basic terminology:**

**Personal data** means any information relating to an identified or identifiable natural person ("the 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.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Recording of data** means the recording of the names of visitors (entrants) to the Main Office and of the name of any NTPS Plc. employee being visited while issuing a one-time security pass to the visitor.

**Camera surveillance** means recordings captured (without live images or sound) by surveillance cameras installed for anti-theft and security reasons at the areas of the Main Office specified in the document entitled "Notice on the electronic surveillance system", suitable for identifying natural persons whose image was captured based in such image. Detailed information about camera surveillance is attached hereto as an annex and shall form an integral part hereof.

### III. Scope, legal basis, purpose, duration and mode of processing:

| Description of personal data   | Legal basis for processing   | Duration of processing  |
|--|--|---|
| Name of Data Subject (name of the natural person visiting the Main Office and of the NTPS Plc. employee being visited) | protection of persons and property in the controller's areas open to the public for customer service (legitimate interest according to GDPR Article 6(1) point (f) and the interest pursuant to Section 5(1) point (c) of Act CXII of 2011 on the Right to Informational Self-determination and on the Freedom of Information ("the Privacy Act") (protection of the vital interests of the data subject or of another person, or the elimination or the prevention of a direct threat to the life, physical integrity or property of persons), supported by a Legitimate Interests Assessment, which is available at toll-charge.hu/Privacy policy or in hard copy at the 1st-floor reception of the Main Office Building A&B | from the time the security pass is issued to the Data Subject until it is returned to the reception |
| image of the Data Subject  |  | 15 working days unless the Data Subject requests the blocking of the recording                      |

The above data shall be processed by the Controller in order to ensure the safety and security of persons and property at the Main Office, prevent any unlawful acts and take the required action (filing a police report where appropriate) where such acts have been committed.

### IV. Persons engaged by the Controller in the data processing, the Processor:

The Operations Support and Development Director and the Occupational Safety and Health Expert are the individuals authorized to process data. No Processor is involved in the processing of the data.

Contact details of the Controller:

registered office: H-1134 Budapest, Váci út 45. Building B

postal address: H-1380 Budapest, Pf. 1170

tel.: +36 1 4368 000

e-mail: [ugyfel@nemzetiudij.hu](mailto:ugyfel@nemzetiudij.hu)

Contact details for the Controller's data protection officer:

[dpo@nemzetiudij.hu](mailto:dpo@nemzetiudij.hu),

tel.: +36 1 4368 000

Additional information concerning the data protection officer is available at [www.nemzetiudj.hu/Adatvédelem](http://www.nemzetiudj.hu/Adatvédelem) or requested in person at reception A&B of the Main Office.

**V. As a Data Subject, you have the following rights regarding data processing:**

1. **Right to information.** Pursuant to Article 15(1) of the GDPR and Section 16 of the Privacy Act, you may request information concerning the personal data processed by NTPS Plc. In this event, NTPS Plc. sends the following information to the address (e-mail, postal address) specified by you:

- your personal data processed;
- the purpose of processing;
- the duration of processing;
- your rights regarding processing;
- the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (“the Data Protection Authority”).

2. **Right to obtain a copy.** Pursuant to Article 15(3) and (4) of the GDPR and Section 17 of the Privacy Act, you may request a copy of your personal data processed by NTPS Plc. In this case, NTPS Plc. sends your personal data processed by it to the address (e-mail, postal address) specified by you.

As a Data Subject, you may request the blocking (restriction) of recordings, it is sufficient to refer to your legitimate interest without demonstrating it. Turning to the authority is not the Data Subject’s only legitimate interest. The blocked recording may be stored beyond 30 days. If the Data Subject also requests a copy of the recording, he or she need not provide a reason therefor.

3. **Right to rectification.** Pursuant to Article 16 of the GDPR and Section 18 of the Privacy Act, we modify or clarify your personal data in accordance with your request.

4. **Right to erasure.** You may request the erasure of your personal data if the purpose of processing as defined in this notice has been achieved or if the data processing was unlawful (Section 20 of the Privacy Act).

5. **Right to restriction.** You may request the restriction of processing in the following cases (Section 19 of the Privacy Act):

- if you contest the accuracy of the personal data, we will restrict their processing until NTPS Plc. verifies their accuracy;
- if the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;
- if NTPS Plc. no longer needs the personal data, but they are required by you for the establishment, exercise or protection of your legal interests; or

In your request for the restriction of processing, you will also need to specify the reason for the request. NTPS Plc. will honour your request for the restriction of processing by storing your personal data separately from all other personal data. For instance, sets of electronic data are saved to external media, while paper-based files are stored in separate folders.

6. **Common rules for the exercise of rights.** NTPS Plc. shall fulfil your request as soon as reasonably possible, within a month at the latest (with the exception of requests to block a recording, which shall be fulfilled by NTPS Plc. without delay). Such deadline may be extended by up to two months.

If your request is denied, NTPS Plc. will inform you, within one month of the receipt of your request, about the reasons for such denial and about your ability to lodge a complaint with the Data Protection Authority and to seek judicial remedy.

NTPS Plc. reserves the right to request additional information necessary to verify the identity of the data subject if it has reasonable doubts concerning the identity of the natural person making the request. Such instances include in particular if a Data Subject makes use of his or her right to request a copy, in which case it is appropriate for NTPS Plc. to ascertain that the request has been submitted by the authorised person.

#### **VI. Your options to enforce your rights**

If you consider that the processing carried out by NTPS Plc. has not complied with legislative requirements, you may initiate a proceeding with the Data Protection Authority (postal address: H-1530 Budapest, Pf. 5., e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

Furthermore, you have the right to initiate court proceedings regarding the processing practices of NTPS Plc. You may initiate such proceedings, at your discretion, at the court competent at your permanent or temporary address.

place and date: Budapest, 13 November 2019

**NTPS Plc.**