



Last updated: 26.01.2022

## Data Processing Notice

This Data Processing Notice (hereinafter as: “**Data Processing Notice**”) determines the characteristics of the data processing actions (in particular the collection, storage and use of data) implemented on the website at <https://ceegex.hu> (hereinafter as: “**Website**”) operated by **CEEGEX Central Eastern European Gas Exchange Private Company Limited by Shares** (registered office: 1134 Budapest, Dévai u. 26-28, company registration number: 01-10-047091, tax number: 23408612-2-41, hereinafter as: “**Data Controller**”).

The currently effective version of this Data Processing Notice shall be published by the Data Controller on its Website and also at its registered office.

This Data Processing Notice was prepared in line with 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 (hereinafter as: **GDPR**), with due consideration of the provisions of Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter as: “**Information Act**”) as well.

In connection with any particular data processing action, the Data Controller may prepare an abstract from this Data Processing Notice, and may further ensure that in connection with the prior information provided in relation to the processing of personal data, the data subjects can declare, by signing this document, that they have learned, understood and acknowledged the contents of the abstract.

### 1. Name and contact details of the Data Controller:

Data Controller’s name: **CEEGEX Central Eastern European Gas Exchange Private Company Limited by Shares (CEEGEX Ltd)**  
Data Controller’s company registration number: 01-10-047091  
Data Controller’s tax number: 23408612-2-41  
Data Controller’s registered office: 1134 Budapest, Dévai utca 26-28.  
Contact details of the Data Controller: [info@ceegex.hu](mailto:info@ceegex.hu)

### 2. Definitions related to the data processing

The terms and expressions used in this Data Processing Notice shall be interpreted according to the definitions specified in Article 4 of the GDPR, and – in certain Sections – in Article 3 of the Information Act.

### 3. Principles of data processing



The Data Controller shall take increased care to protect personal data, comply with mandatory legal provisions, and process data in a secure and fair manner in the course of provision of its services.

In line with the provisions of Section 4 of this Data Processing Notice, the Data Controller shall process the personal confidentially and shall take all security, technical, and organisational measures to guarantee the security of data and compliance with provisions on data protection and data security.

In the course of processing, recording, and transmitting the personal data of a data subjects, the Data Controller shall proceed in full compliance with the relevant provisions of the GDPR and the Information Act, as well as other pieces of applicable legislation.

The Data Controller represents that it processes personal data in full compliance with this Data Processing Notice and it complies with relevant statutory provisions, with special regard to the followings:

- Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject (“lawfulness, fairness and transparency”).
- The Data Controller shall collect the personal data only for specific, clear, and lawful purposes, and in terms of the purposes of data processing, it shall process the appropriate and relevant personal data only to the extent necessary to achieve the respective purpose (“purpose limitation”, “data minimisation”).
- Personal data shall be stored in a form that allows the identification of the data subjects only for the period necessary for achievement of the processing purpose. Personal data may be stored for a longer period, if such data are stored for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes (“storage limitation”);
- Having regard to the requirement that the data need to be accurate and, where necessary, kept up to date; the Data Controller shall take every reasonable step must to ensure that personal data that are inaccurate (if the Data Controller has credible and reliable information about their inaccuracy), having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”);
- Personal data shall be processed by the Data Controller in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (“integrity and confidentiality”).

#### **4. The method and security of data processing**

The Data Controller shall ensure the security of data, and it shall take technical and organisational measures and implement procedural rules that are needed to enforce the provisions laid down in the GDPR, the Information Act and the rules relating to the protection



of data and secrets specified in other legislation. The Data Controller protects personal data against unauthorized access; modification; transmission; disclosure; or accidental erasure and destruction; damages; becoming inaccessible due to changes in applied technologies.

The Data Controller strives to protect data files processed by electronic means in various registers, with a view to ensuring that data stored in different registers cannot be interconnected directly and associated with the data subject, unless permitted by law.

## **5. Data processing actions implemented in relation to the Data Controller's services and Website**

### **5.1. Admission of new members**

Only and exclusively legal entities may apply to become members of the Data Controller, however, in the course of the application process, numerous personal data are transferred to the Data Controller. The candidate company may start trading and enter into dealings on the Data Controller's markets only after it has been successfully admitted to the energy exchange. Once the preconditions of membership are fulfilled (which preconditions are detailed on the Website), the candidate shall be obliged to send the required number of original copies of the forms and supplementary documents indicated on the webpage to the Data Controller, by post, and one duplicate scanned copy from each document to the e-mail address at [membership@hupx.hu](mailto:membership@hupx.hu).

<b>Purpose of data processing</b>	To conduct the procedure of admission of a new member to the Data Controller.
<b>Scope of processed data</b>	Personal data related to the trader exam, personal data related to KELER KSZF membership, personal data included in the forms and supplementary documents required to be filled-in during the member admission procedure, hence in particular the copy of the identity card of the data subject and the contact data.
<b>Scope of data subjects</b>	Associates of the legal entities applying for admission during the membership procedure.
<b>Legal basis of processing</b>	Fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR and the Data Controller's legitimate interest pursuant to Article 6(1)(f) of the GDPR.
<b>Time limit for data storage</b>	For 5 years after termination of the membership relationship.
<b>Method of data processing</b>	On hard copy (paper) or electronically.
<b>Source of the data</b>	Data collected from the data subject.
<b>Possible consequences of failure to provide the data</b>	Provision of the data is obligatory. If the data subject fails to provide the data to the Data Controller, the data subject will not be able to participate in the admission process and may not use the Data Controller's services.



<b>Who can access the data?</b>	The Data Controller's, HUPX Ltd.'s and HUDEX Energy Exchange Ltd.'s competent co-workers and the co-workers of its processors (if any). The currently effective list of the processors of the Data Controller is attached to this Data Processing Notice as Annex 1.
<b>Data transfer to third countries or to international organisations</b>	No data are transferred to third countries or to international organisations.

## 5.2. Trader exam and online training within the framework of adult education

Traders must have a special qualification in order to pursue trading. The existence of this special qualification must be verified by passing an exam (hereinafter as: "**Trader Exam**"). Once this Trader Exam is passed by the trader, it shall be granted a CEEGEX Trader qualification.

Candidates can apply for the trader training and exam by sending the duly completed and signed application form, both electronically and in original (hard) copy. For further information regarding the application process, please consult the menu item of the Data Controller's Website titled "MEMBERSHIP" and within that "TRADER EXAM".

Both the trader training and the Trader Exam are carried out within the framework of adult education pursuant to Act LXXVII of 2013 on Adult Education (hereinafter as: **Adult Education Act**).

<b>Purpose of data processing</b>	To enter into an adult education contract with the Data Controller, to conduct the Trader Exam, to ensure access to the online training, and to ensure that the Data Controller fulfils its obligations undertaken in the adult education contract concluded according to the Adult Education Act.
<b>Scope of processed data</b>	Personal data relating to the Trader Exam and the trader training: <ul style="list-style-type: none"><li>- your natural person identification data (name, name at birth, mother's maiden name, place and date of birth, country of birth),</li><li>- your education identification number in connection with the issue of your education identification number,</li><li>- your e-mail address,</li><li>- your highest level of education,</li><li>- your data processed in relation to the training, relating to your highest level of education, vocational qualification, professional qualification and foreign language skills, your admission into and completion of the training, your exit from training if you have not completed training, your</li></ul>



	<p>assessment and qualification during training, your payment obligations in relation to training and the training loan taken up,</p> <ul style="list-style-type: none"> <li>- your position,</li> <li>- your phone number.</li> </ul>
<b>Scope of data subjects</b>	Persons who have entered into an adult education contract with the Data Controller and who participate in the Data Controller's trader training and Trader Exam.
<b>Legal basis of processing</b>	Fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR, except for the data relating to the data subject's position and phone number, for which the legal basis of processing is the data subject's consent pursuant to Article 6(1)(a) of the GDPR.
<b>Time limit for data storage</b>	Last day of 8 years from the date when the adult education contract was concluded.
<b>Method of data processing</b>	On hard copy (paper) or electronically.
<b>Source of the data</b>	Data collected from the data subject.
<b>Possible consequences of failure to provide the data</b>	<p>The provision of data is mandatory (except for the data relating to the position and phone number of the data subject).</p> <p>Please note that the provision of your data as a natural person participating in the training is a prerequisite for the conclusion of the adult education contract in accordance with the relevant legislation, and without the processing of your personal data we cannot ensure your participation in the adult education and we cannot fulfil our data reporting/data transfer obligations.</p>
<b>Who can access the personal data?</b>	The competent co-workers of the Data Controller, HUPX Ltd, HUDEX Energy Exchange Ltd and the co-workers of their processors (if any). The currently effective list of the processors of the Data Controller is attached to this Data Processing Notice as Annex 1.
<b>Data transfer to third countries or to international organisations</b>	<p>Please be informed that the Data Controller, as an adult education provider, provides data to the adult education state administration body in the adult education data reporting system pursuant to the Adult Education Act.</p> <p>The following data are affected by the data reporting:</p> <ul style="list-style-type: none"> <li>-information on the name, nature, place, number of hours of the training, the first day of training and, except in the case of closed system distance learning (e-learning), the planned date of completion of the training;</li> <li>-your natural person identification data, your e-mail address and your highest level of education;</li> <li>-data on the training fee and the payer of the training fee.</li> </ul> <p>Please be informed that no data are transferred to third countries or to international organisations.</p>



### 5.3. Newsletters

Data controller informs its members and newsletter subscribers about latest news, milestones, expected changes and other updates in an electronic newsletter.

<b>Purpose of data processing</b>	Sending out electronic newsletters
<b>Scope of processed data</b>	name, position, company, email address
<b>Scope of data subjects</b>	In case of members the nominated contact persons of member companies, in case of subscribers the individuals voluntarily subscribing to newsletter
<b>Legalbasis of processing</b>	In case of member contact persons, the legitimate interest of data controller as per Article 6(1)(f) of the GDPR. In case of subscribers, consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
<b>Time limit for data storage:</b>	Until the withdrawal of consent by data subject (unsubscribe).
<b>Method of data processing:</b>	Electronic
<b>Source of the data:</b>	Data collected from the data subject.
<b>Possible consequences of failure to provide the data:</b>	If the data subject fails to provide the data to the Data Controller, the data subject will not receive a comprehensive update on Data Controller's news.
<b>Who can access the personal data?</b>	The competent co-workers of the Data Controller, HUPX Ltd, HUDEX Energy Exchange Ltd and the co-workers of their processors (if any). The currently effective list of the processors of the Data Controller is attached to this Data Processing Notice as Annex 1.
<b>Data transfer to third countries or to international organisations:</b>	No data are transferred to third countries or to international organisations.

### 5.4. Data processing related to job applications

During the selection of employees, Data Controller processes personal data. Applicants may apply for different vacancies under the menu item of the Website titled "Career".



Information related to this data processing shall be provided by the Data Controller under the Data Processing Notice available at the following link: <https://ceegex.hu> under the menu item title "Career".

### 5.5. Contact data

The Data Controller ensures the opportunity for its clients and users visiting the Website to contact the Data Controller through any of the contact channels specified on the Website.

<b>Purpose of processing:</b>	Liaising with clients and contacting them.
<b>Scope of processed data:</b>	Name, address, e-mail address, possibly phone number of the data subject, and other information related to the request/contacting.
<b>Scope of data subjects:</b>	Persons contacting the Data Controller.
<b>Legal basis of data processing:</b>	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR.
<b>Time limit for data storage:</b>	Until the purpose is achieved, but until erasure at the data subject's request.
<b>Method of data processing:</b>	Electronic
<b>Source of the data:</b>	Data collected from the data subject.
<b>Possible consequences of failure to provide the data:</b>	If the data subject fails to provide the data to the Data Controller, the data subject will not be able to contact the Data Controller.
<b>Automated decision-making and profiling:</b>	The Data Controller does not perform any automated decision-making or profiling.
<b>Who can access the personal data?</b>	The Data Controller's, HUPX Ltd.'s and HUDEX Energy Exchange Ltd.'s competent co-workers and the co-workers of its processors (if any). The currently effective list of the processors of the Data Controller is attached to this Data Processing Notice as Annex 1.
<b>Data transfer to third countries or to international organisations:</b>	No data are transferred to third countries or to international organisations.

### 5.6. Data processing connected to the keeping of records related to the exercising of data subject rights as per the GDPR

<b>Purpose of data processing</b>	Data processing connected to the keeping of records related to the exercising of data subject rights as per the GDPR.
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<b>Scope of processed data</b>	Name, place and date of birth, mother's name, address, mailing address of the applicant, the application to exercise the data subject right as per the GDPR.
<b>Scope of data subjects</b>	The person exercising the data subject right as per the GDPR.
<b>Legal basis of processing</b>	The legal basis of processing: fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR and the legitimate interest as per Article 6(1)(f) of the GDPR.
<b>Time limit for data storage</b>	5 years following the assessment of the application.
<b>Method of data processing</b>	Paper-based and/or electronically
<b>Source of the data</b>	Data collected from the data subject.
<b>Possible consequences of failure to provide the data</b>	It is necessary to process the data to ensure that the Data Controller can comply with the requirements laid down in the GDPR.
<b>Automated decision-making and profiling</b>	The Data Controller does not perform any automated decision-making or profiling.
<b>Who can access the personal data?</b>	The Data Controller's, HUPX Ltd.'s and HUDEX Energy Exchange Ltd.'s competent co-workers and the co-workers of its processors (if any). The currently effective list of the processors of the Data Controller is attached to this Data Processing Notice as Annex 1.
<b>Data transfer to third countries or to international organisations</b>	No data are transferred to third countries or to international organisations.

### 5.7. Cookies

The Data Controller is using cookies in the course of operation of the Website. Cookie is a small data file (hereinafter as: cookie) sent by the Data Controller to the data subject's browser program, to be stored on the data subject's device.

The Cookies used on the Website are not suitable to identify the data subjects, these are necessary to ensure the services of the Website. By default, most the browser programs accept cookies, however, the data subject may decide to choose a setting that rejects the cookies and/or signals their receipt. The Google Analytics Opt-out Browser Add-on does not prevent the data being sent to the website itself and other Internet analytics services. The use of cookies allows the Data Controller to retrieve and store individual visitor information and thereby to monitor the use of the Website. The purpose of this is to allow the Data Controller to get information about how many visitors visit the Website, when and in what manner. Through these anonymized data, the Data Controller will be able to optimise the Website in the future to ensure the appropriate user experience. Further information on the use and protection of data is available at the following link: <https://policies.google.com/privacy?hl=hu>.





<b>Purpose of data processing</b>	To examine website-visiting habits, and facilitate the contacting of the Data Controller.
<b>Scope of processed data</b>	The Internet Protocol Address (IP address) of the IT device, Domain Name (URL), Access Data, Client File Retrieval (File Name and URL), HTTP Response Code, website data from which the request was made, the amount of bytes downloaded/uploaded during the visit, date of visit, details of pages viewed.
<b>Scope of data subjects</b>	Persons visiting the Website.
<b>Legal basis of processing</b>	Consent of the data subject as per Article 6(1)(a) of the GDPR, in accordance with Article 155(4) of the Electronic Communications Act.
<b>Time limit for data storage</b>	Maximum one year from the date of data collection.
<b>Method of data storage</b>	Electronic.
<b>Source of the data</b>	Data collected from the data subject.
<b>Possible consequences of failure to provide the data</b>	The provision of personal data is not a prerequisite for the conclusion of the contract or the use of the Website.
<b>Who can access the data?</b>	The Data Controller's competent co-workers and the co-workers of its processors (if any). The currently effective list of the processors of the Data Controller is attached to this Data Processing Notice as Annex 1.
<b>Data transfer to third countries or to international organisations</b>	No data are transferred to third countries or to international organisations.

## 6. Data processors

Data Processors may not make decisions independently, and they shall act in compliance with their contracts concluded with and the instructions received from the Data Controller. Data processors record, manage, and process personal data transmitted to them by the Data Controller in line with the provisions of the GDPR. The Data Processors shall perform data processing actions regarding the personal data provided by the data subjects during the period specified in this Data Processing Notice, adjusted to the individual data processing purposes.

Data Controller shall transfer data to the companies specified in the list of data processors attached to this Data Processing Notice as Annex no. 1, and shall use these companies as data processors.

The processed personal data may be accessed primarily by the Data Controller and the internal staff of the Data Controller; however these data shall not be published or disclosed to any third party other than the data processors or other cooperating third-party service providers. With regard to operating the services and settling accounts, the Data Controller may use a data processor and may cooperate with third-party service providers.

## 7. Enforcement of the rights of data subjects



The data subjects may request information about the processing of their personal data; they may request the rectification of their personal data; the restriction of processing; erasure of their data directly from the Data Controller through the e-mail address at [dataprotection@ceegex.hu](mailto:dataprotection@ceegex.hu), and shall have the right to data portability, the right to legal remedy, and to withdraw their consent. Data subjects may file any possible complaints in the territory of Hungary to the Hungarian National Authority for Data Protection and Freedom of Information, or to a court selected at their own discretion. The regional courts shall have jurisdiction in such court proceedings.

The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing, to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform the data subject about those recipients if the data subject requests it.

**a) Right to information and access**

In accordance with the obligation set out in Article 13 of the GDPR, the Data Controller is required to provide the following information on data processing to the data subject, if the personal data comes from the data subject, at the time of obtaining the personal data:

- a) the identity and the contact details of the controller and its representative;
- b) the contact details of the data protection officer, where applicable;
- c) the purpose of the processing for which the personal data are intended as well as the legal basis for the processing;
- d) the recipients or categories of recipients of the personal data, if any;
- e) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- f) information about the existence of the right to request from the data controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- g) where the processing is based on consent, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- h) the right to lodge a complaint with a supervisory authority;
- i) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data.

Where personal data have not been obtained from the data subject, the Data Controller shall provide the data subject with the above information and in addition to them, pursuant to Article 14 of the GDPR, the following information:

- a) the categories of personal data concerned;



- b) the recipients or categories of recipients of the personal data, if any;
- c) from which source the personal data originate, and if applicable, whether it came from publicly accessible sources.

Where personal data have not been obtained from the data subject, the Data Controller shall provide the information:

- a) within a reasonable period after obtaining the personal data, but at the latest within one month;
- b) if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
- c) if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

The above described information provision obligation is not required to be fulfilled, if:

- the data subject already has the information referred to in these Sections;
- making such information available would be impossible or would involve a disproportionate effort;
- obtaining or disclosure is expressly laid down by Union or currently effective Hungarian law to which the Data Controller is subject and which also provides appropriate measures to protect the data subject's legitimate interests; or
- where the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or currently effective Hungarian law.

The right of access of the data subject shall, in accordance with Article 15 of the GDPR, cover making the following information available:

- purposes of data processing;
- the categories of personal data concerned;
- the recipients to whom personal data has been or will be disclosed;
- the envisaged period for which the personal data will be stored;
- the rights of the data subject with regard to the processing of personal data;
- the source of the data, if not collected from the data subject;
- information about automated decision-making.

In all cases, the Data Controller shall endeavour to ensure that the information it provides to the data subject is, in all cases, concise, transparent, understandable, easily accessible, clear and comprehensible, subject to compliance with the GDPR rules. It shall be the Data Controller's liability to perform the information provision and carry out the measure. The Data Controller shall provide all information to the data subject in writing, including by electronic means.

With regard to the data security rules set out in Article 15 and Article 32 of the GDPR, the Data Controller shall provide information to the data subject only and exclusively if the Data Controller verified the identity of the data subject.



If the identity is not verified, the Data Controller shall reject the request for exercising the relevant right and inform the data subject about the manner of exercising his rights.

The Data Controller shall inform the data subject within one month of the receipt of the request, provided that the request related to the data subject's rights was made in a properly communicated declaration. Taking into account the complexity of the request and the number of requests received, the Data Controller may extend this one month deadline by two further months, within one month following the submission/receipt of the request to the Data Controller, through a notification sent to the data subject, with reasoning attached.

It shall be considered as proper communication or receipt, if the written request is sent by the data subject to and received at the official address of the Data Controller or the email address provided for this purpose.

Any request that has not been communicated in one of the above-mentioned proper ways shall be disregarded by the Data Controller.

Any information and communication relating to the processing of the personal data must be easily accessible and easy to understand, and clear and plain language must be used. This principle concerns, in particular, information to the data subjects on the identity of the controller and the purposes of the processing and further information to ensure fair and transparent processing in respect of the natural persons concerned and their right to obtain confirmation and communication of personal data concerning them which are being processed.

The information and measures stipulated in this Section shall be provided by the Data Controller free of charge, and Data Controller shall charge any expense reimbursement only in the case specified under Article 12(5) of the GDPR.

#### **b) Right to rectification**

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

#### **c) Right to erasure (“right to be forgotten”)**

The data subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay and the 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) the data subject withdraws his/her consent underlying the processing and there is no other legal basis for the processing;
  - c) the personal data have been unlawfully processed;
  - d) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the data controller is subject;
- OR
- e) the personal data have been collected in relation to the offer of information society services.

The data subject's right to erasure can only be restricted in the case of the following exceptions as per the GDPR, i.e. even if the above reasons exist, the further retention of personal data may be considered lawful,

- a) if it is necessary for exercising the right to freedom of expression and information, or
- b) if it is necessary for compliance with a legal obligation (i.e. a legal obligation in the Data Processing Register for an activity defined by the legal basis for a period appropriate to the purpose of data processing), or
- c) if it is necessary for performance of a task carried out in the public interest, or
- d) if it is necessary for the exercising of an official authority vested in the data controller, or
- e) if it is necessary for the fulfilment of public interest affecting the area of public health,
- f) if it is necessary for archiving in the public interest, or
- g) if it is necessary for scientific or historical research or for statistical purposes, or
- h) if it is necessary for the establishment, exercise or defence of legal claims.

#### **d) Right to data portability**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data have been provided, if:

- the data subject's consent was the legal basis of processing or the processing was necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract [Article 6(1) or point (b) or Article 9(2)(a) of the GDPR]

AND

- the processing is carried out by automated means.

The right set out in this clause is not held by the data subject if the data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller, and if that right would adversely affect the rights and freedoms of others.



If the Data Controller is required to disclose the personal data to a person other than the data subject based on the data subject's right to data portability, the Data Controller shall inform and call upon such third party recipient – within the framework of this Data Processing Notice – that they shall not be allowed to use the personal data disclosed by the Data Controller in terms of the data subject for their own purposes, and may only process these personal data in compliance with the applicable data protection legislation, tied to the specific purpose. The Data Controller shall not undertake any liability for the third party's use of the personal data transferred in the proper manner to the third party at the data subject's request.

#### **e) Right to withdraw the consent**

If the data subject's personal data are processed by the Data Controller based on the data subject's consent, the data subject shall have the right to withdraw their processing consent at any time. In connection with this, the Data Controller informs the data subjects that the Data Controller may continue to process the data subject's personal data even after the withdrawal of the data subject's consent for purpose of performance of its legal obligation or enforcement of its legitimate interests, as long as the enforcement of the interest is proportionate to the restriction of the right to protect the personal data.

#### **8. Legal Remedy**

The Data Controller shall compensate the damages caused to any party as a result of unlawful processing of the data subject's data or violation of the data security requirements, and shall pay the aggravated damages (compensation for injury to feelings) payable in the event the Data Controller or the data processor hired by it caused personality right infringements. The data controller shall be exempt from the liability for the damages caused and from the obligation to pay the aggravated damages if it proves that it is not in any way responsible for the event giving rise to the damage.

The data subject shall be entitled to turn directly to the Data Controller for remedy regarding any violation caused to them or in relation to any complaint, at the following e-mail: [dataprotection@ceegex.hu](mailto:dataprotection@ceegex.hu)

Should the data subject have any complaints regarding the data processing carried out by the Data Controller, the data subject may file a complaint to the Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11, mailing address: 1363 Budapest, Pf.: 9; phone number: +36 (1) 391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)).

The data subject may refer their case to court in order to protect their data, and the court will address their case in an accelerated procedure. In such an event, the data subjects may decide whether they file their legal action to the regional court having competence according to their domicile (permanent address) or according to their habitual residence (temporary address)(<http://birosag.hu/torvenyszekek>). They can look up the regional court having competence according to their domicile or habitual residence on the website at <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.



## **9. Miscellaneous provisions, entry into force**

This Data Processing Notice shall enter into force on 7 January 2021 and shall be in effect until revoked.

Data Controller reserves its right to amend this Data Processing Notice. If the amendment affects the use of the data subject's personal data provided by them, the Data Controller shall notify the data subject about the particular amendment in the appropriate form, such as in e-mail. If the details of the data processing are also changed as a result of amendment of the Data Processing Notice, the Data Controller shall ask for the data subject's consent separately. For matters not regulated under this Data Processing Notice, the provisions of the GDPR, and – where allowed by the GDPR – the provisions of the Information Act shall be applied.



## Annex no. 1 - Currently effective list of the processors of the Data Controller

- **ACTIVUM-PLUSZ Műszaki, Munkabiztonsági Tanácsadó, és Kereskedelmi, Szolgáltató Betéti Társaság** (registered office: 1138 Budapest, Párkány utca 16. 6. em. 38.; company registration number: 01-06-755171; tax number: 21520840-2-41; for the purpose of performance of tasks related to workplace safety and fire prevention);
- **BDO Magyarország Könyvelő és Bérszámfejtő Korlátolt Felelősségű Társaság** (registered office: 1103 Budapest, Kőér utca 2/A C. ép.; company registration number: 01-09-683046; tax number: 11915609-4-42; for the purpose of performance of bookkeeping and payroll accounting tasks);
- **Bluebird International Kereskedelmi és Szolgáltató Zártkörűen Működő Részvénytársaság** (registered office: 1075 Budapest, Madách Imre út 13-14. B. ép. IV. em.; company registration number: 01-10-046166; tax number: 14455386-2-42; for the purpose of manpower recruitment);
- **Gas Management Services Limited** (registered office: Clarendon House, Clarendon Road, Cambridge CB2 8FH, Egyesült Királyság; company registration number: 3160917; tax number: GB 676611514; for the purpose of trading system operation);
- **HUDEX Magyar Derivatív Energiatőzsde Zártkörűen Működő Részvénytársaság** (registered office: 1134 Budapest, Dévai utca 26-28.; company registration number: 01-10-049303; tax number: 25941667-2-41; for the purpose of IT services);
- **HUPX Magyar Szervezett Villamosenergia-piac Zártkörűen Működő Részvénytársaság** (registered office: 1134 Budapest, Dévai utca 26-28.; company registration number: 01-10-045666; tax number: 13967808-2-41; for the purpose of performance of HR tasks, market operation and other administrative tasks);
- **Mercarius Flottakezelő Korlátolt Felelősségű Társaság** (registered office: 1142 Budapest, Komáromi út 36-38.; company registration number: 01-09-886659; tax number: 12238673-2-42; for the purpose of car fleet management);
- **Oxy-Med Orvosi Szolgáltató Korlátolt Felelősségű Társaság** (registered office: 1132 Budapest, Váci út 32. 1. em. 1.; company registration number: 01-09-930569; tax number: 11696704-1-41; for the purpose of provision of occupational health services);
- **VAT'son Magyarország Szolgáltató Korlátolt Felelősségű Társaság** (registered office: 2000 Szentendre, Duna korzó 27. fszt. 3., company registration number: 13-09-134356, tax number: 13207582-2-13, for the purpose of tax consultancy).