Privacy Notice on the processing of certain personal data generated when using the MOL Limo service

- I. During the general use of the service,
- II. On the processing of certain personal data generated in the course of the use of the service by Business Users in the framework of the cooperation with Business Customers

I. Processing of certain personal data generated by the general use of the service

Denomination and purpose of the data	Legal basis for data processing	Scope of the data processed	Duration of data	Recipient of the data	Data processorand
processing			processin	transfer	data
			g		processing activity
Electronic	Performance of the	First name, last	In the case of	MOL Plc (1117	VULOG S.A., The
contracting, service	contractpursuant to point	name, user ID,	data processed	Budapest,	Crown, 21, Avenue
usage, service	(b), paragraph 1 of Article	dateof birth,	on the basis of	Dombóvári út	Simone Veil, 06200
provision, sending	6 of the GDPR	gender (optional),	electronic	28.), MOL Limo	Nice, France – ancillary
pushmessages to the		email address	contracting,	andMOL Plc. are	service provision closely
user inthe		(contact),	service use,	considered as	linked to thedata
application (e.g.		password (stored	service	joint data	processing server
if Terms and	In addition, this data	anonymously	provision and	controllers.	<u>services</u>
Conditions, Privacy	processing is in	after	related push		
Notice has been	accordancewith	identification),	<i>messages,</i> we	UNION Vienna	Company contracted
modified), billing	paragraphs (1)-(9) of	address, billing	keep the data	Insurance Group	with VULOG
and contacting	Article 13/A of Act CVIII	address, mobile	in an active	Biztosító Zrt.	S.A. to provide server
	of 2001 on certain	phone number	database for 7	(Registered	services: SAS OVH , 2 rue
Push messages will	aspects of electronic	(contact and	days after	office: 1082	Kellermann
bedisplayed if the	commerce services and information society	finalization of	deletion of the	Budapest, Baross	- 59100 Roubaix - France

user, while using the	services	registration),	user account at	u.1., Customer	ADYEN B . V. Simon
application, gave		driving licence	the request of	Service:	Carmiggeltstraat 6-50
consent to it.		number, driving	the data	1134 Budapest,	1011DJ Amsterdam The
		licence issue date	subject.	Váci út	Netherlands –
				33, (06 1) 486	operatin <u>g the online</u>
				4343) and	payment system,
				Allianz Hungária	ancillary service
				Zrt. Registered	provision closely
				office:1087	related to data
				Budapest,	processing <u>server</u>
				Könyves Kálmán	<u>services</u>
				krt. 48-52.,	MOL
				Customer Service.	Magyarorszá
				48-52., +36 (1)	g Társasági
				421-	Szolgáltatások Kft.
				1-421, a	(1117 Budapest,
				investigation of	Dombóvári út 28)
				damage incidents	Postal services.
				related to the use	
				ofthe service,	MOL IT & Digital GBS
				damage	Kft. (1117 Budapest,
				assessment.	Dombóvári út 28.) –
					ancillary services closely
				Céginformáció.	related to the data
				huKft. (1191	processing
				Budapest, Üllői út	, <u>IT services,</u>
				200., Cgj.: 01-09-	
				065988, tax	Provision of MOL systems.
				number:	
				10347036-2-43,	MOL GBS Hungary Ltd.
				info@ceginformaci	
				0	Dombóvári út 28.)
				.hu)	20.7

			ancillary services closely
		Claims	related to the data
		management	processing, <u>billing</u>
		according to the	AAGU Elast Gal dia a Kir
		contract with	MOL Fleet Solution Kft.
		MOL Limitless	(1117 Budapest,
			Dombóvári út 28.)
			ancillary services closely
		policies of MOL	
			processing, <u>provision of</u>
		Kft.:	<u>vehicles</u>
		Céginformáció.hu	
		Kft.	Microsoft Hungary Ltd., -
			online data storage, cloud
			services (1031 Budapest,
			Graphisoft Park 3, 01-09-
			262313,
			https://www.microsoft.co
			m/hu-hu/contact.aspx)
			, , , , , , , , , , , , , , , , , , , ,
			T-Systems Zrt. (registered
			office: 1117 Budapest,
			Budafoki út 56., e-
			mail
			address:
			TS_ugyfelkapcsolat@t-
			systems.hu, company
			registration no: 01-10-
			044852) - accounting,
			billing and operation
			and development of
			invoicing and accounting

		systems
		Batch - IMEDIAPP SA
		41-43 rue Beaubourg,
		75003 Paris push
		messages (e.g, GTC,
		Privacy Notice changes), if
		the user has given his/her
		consent
		in the phone application.
		https://batch.com/
		Supercharge Kft 1075
		Budapest, Károly krt. 9
		ancillary services closely
		related to the data
		processing:
		provision of the
		registration
		interface
		https://supercharge.io/con
		tact
		the sub-processor used by
		Supercharge Kft.:
		Twilio Inc(San
		Fransisco, California, U.S.)
		- Providing SMS service to
		finalize registration
		https://www.twilio.com/

Camplaints In 1911	Development (4) (5) 5	Haar ID Start	2	
Complaints handling	Paragraphs (4)-(5) of	-	3 years from the	
(for more detailed information on data	Article 17/A. of Act CLV of 1997 on Consumer		date of the complaint.	
processing, please see	1997 on Consumer Protection (hereinafter	home address, billing address,	Under	
the section	referred to as the	email address,	paragraph (7)	
"Description of the	"Consumer Protection	mobile phone	of Article 17/A	
data processing	Act")	number, service	of	
process")	1	platform:	theConsumer	
,		Android, IOS,	Protection Act	
The Privacy Notice for		web, vehicle	the undertaking	
Customer Service		location (GPS)	shall keep a	
communications is		data, the content	record of the	
available at the		of the record of	complaint and a	
following link:		the complaint	copy of the	
https://www.mollimo		pursuant to	reply for 3	
.hu/l		Paragraph (5) of	years	

		Article 17/A of	make it available	
		the	to the	
		Consumer	controlling	
		Protection Act	authorities at	
		1 Totalion 7 Ct	their request.	
Direct marketing	Consent of the data	I. First name,	The data is	Mailchimp - The Rocket
2 in det illiameting	subject pursuant to point	surname, date of	deleted within	Science Group, LLC
I. Sending	a) paragraph (1) of Article	birth, gender,	15 days from	675 Ponce de Leon Ave
electronic	6 of the GDPR	address, e- mail	the withdrawal	NE Suite 5000
newsletters,	o or the dar K	address, mobile	of consent.	Atlanta, GA 30308 USA -
advertising,	The consent to the data	phone number	or consent.	direct marketing
promotions, direct	processing is voluntary	priorie riamber		services
marketing or other	and must include explicit	II. IP address,		https://mailchimp.com/
marketing content or	and unambiguous	user ID, operating		Tittps.//maneminp.com/
sending	consent and be based on	system version,		Batch - IMEDIAPP SA
questionnaires to the	appropriate information.	operating system		41-43 rue Beaubourg,
User for the purpose		language, mobile		75003 Paris - direct
of satisfaction		phone type,		marketing services in
measurement, market		mobile operator		the form of push
research or displaying	The 11 control of the 12 contr	name		messages
them in an	The User can give consent	Hame		https://batch.com/
application, if the User	to the display of			iittps.//batcii.com/
has expressly	marketing content via the			
consented to this	application by clicking on			
during registration.	the "Enable notifications"			
during registration.	button when			
II. If the User has	downloading/opening the			
given explicit consent	application, which can be			
to receive	modified or withdrawn by			
notifications in the	under the			
phone application,	"settings/notifications"			
marketing content in	tab.			
marketing content in				

the application can also be displayed as a push message.				
Checking the	Legitimate interest of	Photograph of	The Data	Supercharge Kft 1075
existence of a valid	thedata controller	thedriving	Controller shall	Budapest, Károly krt. 9
driving licence (for	under point (f)	licence of the	keep a copy of	ancillary services closely
more detailed	paragraph (1) of	service user -	the driving	related to the data
information on data	Article 6 of the GDPR	Copyof the front	licence of the	processing: providing
processing, please		and back of the	data subject	the interface for
see the section	The interest assessment	driving licence	uploaded to the	registration
"Description of the	testis available by clicking	(The first purpose	system only for	
data processing	on thefollowing link:	- to check driving	the time strictly	
process")	https://www.mollimo.hu/	licence details by	necessary for	
	hu	uploading a copy	the verification	
	/legal	of the driving	of the data -	
		licence.) A	for 24 hours	
		photograph of the	after	
		service user on	registration -	
		the front of the	after which the	
		user's driving	copy of the	
		licence and of	driving licence	
		user atthe same	and the photo	
		time (to verify the	of the front of	
		identity of the	the driving	
		service user and	licence and the	
		the owner of the	self- portrait	
		driving licence,	shall be	
		thus preventing	permanently	
		fraud and abuse).	deleted from	
			the system.	

Requesting a copy of	Legitimate interest of	Copy of the	The Data	Supercharge Kft
the address page of	the data controller	address page of	Controller	1075Budapest, Károly
the address card	under point (f)	the address	stores a copy of	krt. 9ancillary services
(official proof of	paragraph (1) of	card, address	the address	closely related to the
address) for	Article 6 of the GDPR	(residence	card uploaded	data processing:
verificationpurposes		and/or	to the system	providing the interface
	It is in the legitimate	domicile).	only for the	for registration
	interest of the Data		time strictly	
	Controller to prevent	The Data	necessary to	
	misuse and to enforce	Controller is	verify the data,	
	any legal claims that	aware of some	24 hours after	
	may arise based on the	of the other data	registration,	
	User's address.	on the address	after which the	
		card (e.g. date of	copy of the	
	During the registration	birth) for other	address card is	
	of the User, the Data	data processing	permanently	
	Controller checks	purposes, but	deleted from	
	whether the address	asks the User to	the system.	
	provided by the User	cover the data	,	
	in the system and the	other than the		
	address on the address	address, place of		
	card match, and	residence and		
	whether the User can	name.		
	actually be reached	name.		
	there.			
	there.			
	The interest			
	assessment test is			
	available by clicking on			
	the link below:			
	https://www.mollimo.			
	hu/hu/legal			

Data processing in	point (f) paragraph (1)	All personal data	If the	If MOL Plc.
connection with	of Article 6 of the	as defined in the	investigation	initiates an
notifications (for	GDPR (data processing	previous	reveals that the	ethics
more detailed	is necessary for the	purposes of data	notification is	investigation,
information on data	purposes of the	processing.	unfounded or	the members of
processing, pleasesee	Company's legitimate		that no further	the Ethics Board
the section	interests).		action is	shallhave access
"Description of the			necessary, the	to thedata
dataprocessing	Legitimate interest: to		data relating to	necessary for
process")	prevent, detect and		the notification	the
	hold accountable		shall be deleted	investigation.
Preventing, detecting	those responsible for		within 60 days	
and investigating fraud	irregularities that		of the end of	MOL Plc (1117
and abuse regarding	threaten the		the	Budapest,
the notifications and	Company's assets,		investigation.	Dombóvári út 28.)
investigating conduct	trade secrets,		Where action is	
that violates the MOL	intellectual property		taken on the	
Group Code of Ethics	and reputation, and an		basis of the	
and Business Conduct	appropriate, respectful		investigation,	
andthe Partner Code of	and fearless and non-		including legal	
Ethics.	retaliatory working		proceedings or	
	environment.		disciplinary	
The MOL Group's			action against	
Code of Ethics and			the person	
Business Conduct,			making the	
Business Partner			report, the data	
Code of Ethics, Ethics			in connection	
Council Code of			with the	
Procedure ("Code of			notification	
Ethics"), are			shall be	
available at:			processed in the	
https://mol.hu/hu/mo			employer's	

Legal claims (for more detailed information ondata	The data controller's legitimate interest in the consent of the data	All the information in this prospectus;	notification system up to the date of the final and binding decision on the proceedings initiated on the basis of the notification. In case of a claim based on the legitimate	In the event of a request from a public	Céginformáció.hu Kft. (1191 Budapest, Üllői út 200., Cgj.: 01-09-065988,
processing, pleasesee the section "About the data processing process")	subjectunder point (f) paragraph (1) of Article 6 of the GDPR The interest assessment testis available by clicking on thefollowing link: https://www.mollimo.hu/ hu /legal	except for: password, billing address, debit card/credit card details listed in the first purpose	interest of the Data Controller, for a period of 5 years from the termination of the contract or the breach of contract. The personal data processed for the first purpose will be deleted 7 days after the deletion of the user account at the request of the data subject and the	authority, forwarding the data requested to the public authority.	tax number: 10347036-2-43, info@ceginformacio.hu), claims management in accordance with the contract with MOL Limitless Mobility Kft. andthe internal rules of MOL Limitless Mobility Kft. MOL Fleet Solution Kft.(1117 Budapest, Dombóvári út 28.) - ancillary services closely related to the data processing, provision of

vehicle location	<u>vehicles</u>
(GPS) data	
will be archived	
after 7 days	
from the date	
oftermination	
of the	
individual	
rental contract,	
and may only	
<u>be used for the</u>	
purposes of	
<u>handling</u>	
complaints or	
<u>legal claims</u> . In	
the event that	
the competent	
authorities	
initiate	
proceedings in	
connection	
withthe	
individual	
rental contract	
in question or	
MOL Limitless	
Mobility Ltd.	
initiates	
proceedings,	
thedata will be	
stored until the	
proceedings are	

			completed.		
Complying with a	point (f) paragraph (1) of	Of all the	The processing of	The authority	MOL Fleet Solution Kft.
publicauthority	Article 6 of the GDPR	information	data by public	contacting our	(1117 Budapest,
request	(processing of personal	contained in this	authorities or	company.	Dombóvári út 28.) -
	data is necessary for the	notice, the	other authority,		ancillary services closely
	purposes of the legitimate	official data	as a third party,		related to the data
	interests pursued by the	specifically	for the period		processing provision of
	Company and the public	mentioned in	necessary to		vehicles
	authority as	the request.	protect the		
	third parties).		legitimate		
			interests of the		
	Legitimate interest: the		third party,		
	Company has a		until the		
	legitimate interest in		administrative		
	being able to comply		procedure has		
	with the public		been finally		
	authority's request in a		terminated.		
	timely manner. It is in		The Company		
	the legitimate interest of		will be able to		
	the public authority or		provide precise		
	other public body to be		information on		
	able to pursue the		the requesting		
	proceedings pending		authority, while		
	before it and to disclose		the authority		
	the details of the case		will be able to		
	concerned.		provide precise		
			information on		
	Upon request, the		the data		
	Company will provide		processing		
	the person concerned		carried out by		

	with the interest		the authority.	
	assessment test.			
Checking the	Legitimate interest of	The front of the	The Data	
existence of the	thedata controller	SOTE card, name	Controller	
SOTE card	under point (f)	on the card,	stores the	
The Data Controller	paragraph (1) of	photo	photo sent	
offers a 10% discount	Article 6 of the GDPR		from the front	
oncurrent prices for			of the SOTE	
SOTE students and	The data controller has a		card for the	
Limo users.To set this	legitimate interest in		time strictly	
up and to justify the	verifying the card,		necessary to	
reference to the	because this enables it to		verify the data,	
discount, the	provide the discount to		up to 24 hours	
verification of the	SOTE students and thus		from the date	
SOTE card is	promote the service to		of setting the	
necessary.	them.		discount	
			, in the case of	
	The company makes the		registration, it	
	interest assessment test		is stored for 24	
	available on request.		hours after the	
			registration is	
			finalised, after	
			which the	
			photo of the	
			card is	
			from your system	
			permanently.	
Maintaining a list of	Legitimate interest of	User's personal	The Data	Supercharge Kft
Users who are in	the data controller	data in hashed,	Controller	1075Budapest, Károly
breachof contract.	under point (f)	encrypted form.	stores the	krt. 9ancillary services

	paragraph (1) of		personal data	closely related to the
A User will be	Article 6 of the GDPR	The following	in a hashed,	data processing:
included in this list if		personal data is	encrypted form	providing the interface
he/she has violated		encrypted and	for 5 years from	for registration
the provisions of the	It is in the legitimate	hashed:	the date of	
GTC and, as a result,	interest of the Data		inclusion on the	MOL IT & Digital GBS Kft
the Data Controller	Controller that the	email address,	list of Non-	(1117 Budapest
has suspended	User who is in breach	date of birth,	Contracting	Dombóvári út 28.)
his/her Useraccount	of contract cannot use	driving licence	Users.	ancillary services closel
and/or terminated	the service for a	number,		related to the dat
the Framework	certain period of time,	address,	In certain cases,	processing: <u>IT services</u>
Agreement with	cannot conclude a	telephone	as set out in the	
him/her by meansof	Framework Contract,	number.	GTC, the Data	Provision
an extraordinary	thus the Data		Controller	ofMOL systems.
termination.	Controller can prevent		processes the	
	the User from		hash generated	Microsoft Hungary Ltd.,
The Data Controller	committing further		from the User's	- online data storage,
stores the User's	breach of contract		personal	cloud services (1031
personal data for this	(e.g. drunk driving,		datafor 20	Budapest,
purpose only in	other non- contractual		years from the	Graphisoft Park 3, 01-
hashed,encrypted	use of vehicles).		date of placing	09-
form in orderto			the User on the	262313,
ensure that the User			list of Non-	https://www.microsoft.co
who is in breachof the	The company makes		Contracting	m/hu-hu/contact.aspx)
contract will not be	the interest		Users.	
able to use the service	assessment test		, in particular,	
for a certain period of	available on request.		but not limited	
time or to conclude a			to: driving	
Framework Contract			without a	
again.			licence, driving	
			while	
The Data Controller			intoxicated,	

compares the hash		driving under	
withthe data of the		the influence of	
registering User in		any other mind-	
order to determine		altering	
whether the		substance,	
registrant can be		damaging the	
linked to the person		vehicle	
on the list of Non-		intentionally or	
Contracting Users		seriously	
		carelessly.	

The Data Controller also informs the Users that in order to improve the quality of the service, it prepares anonymized statistics and statements from the data entered into the system. These data are not suitable for personal identification.

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

Data Controller I.: MOL Limitless Mobility Kft. (1117 Budapest, Dombóvári út 28.)

Data Controller II: MOL Plc (1117 Budapest, Dombóvári út 28..)

The data controllers (I and II) are deemed to be joint data controllers, whereby they determine the purpose and scope of the data processing jointly and they are jointly liable for the data processing. The data controllers have a joint privacy notice.

The attorney represents his client in court, in proceedings before a notary or in enforcement proceedings on the power of attorney during the legal/enforcement phase of the debt management procedure and uses personal data in the course of his legal representation of his client. The attorney maylawfully obtain access to the debtor's personal data from his client on the basis of a legal authorisation, without the debtor's consent.

Data Controller III: UNION Vienna Insurance Group Biztosító Zrt. (Seat: 1082 Budapest, Baross u. 1., Customer Service: 1134 Budapest, Váci út 33., (06 1) 486 4343)

Data Controller IV: Allianz Hungária Zrt. (Seat: 1087 Budapest, Könyves Kálmán krt. 48-52., Customer Service. 48-52., +36 (1) 421-1-421

Data Controller V: Céginformáció.hu Kft. (1191 Budapest, Üllői út 200., Cgj.: 01-09-065988, tax number: 10347036-2-43,

info@ceginformacio.hu)

Claims management according to the contract with MOL Limitless Mobility Kft. and the internal rules of MOL Limitless Mobility Kft:

Céginformáció.hu Kft. (1087 Budapest, Könyves Kálmán körút 76.)

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

MOL Limitless Mobility Ltd.: info@mollimo.hu

MOL Plc.: ugyfelszolgálat@mol.hu

UNION Vienna Insurance Group Biztosító Zrt.: ugyfelszolgalat@union.hu

Allianz Hungária Zrt.: +36 (1) 421-1-421

Céginformáció.hu Kft: info@ceginformacio.hu, http://www.ceginformacio.hu

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

Data Controller I.: dpo@mol.hu
Data Controller II.: dpo@mol.hu

Data Controller III: <u>ugyfelszolgalat@union.hu</u>

Data Controller IV: Strategic and General Management Division Compliance Department; Postal address: 1368 Budapest, Pf. 191., Fax: +36 (1) 301-6052.

Data Controller V.: info@ceginformacio.hu, http://www.ceginformacio.hu

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

Data Controller I.:

MOL Limitless Mobility Ltd.: executives, operations manager, car manager, customer service representative, sales and marketing manager

Data Controller II:

MOL Plc: project manager, product coordinator, technical expert, legal adviser, sales manager, business development and project management expert, IT manager, application development expert, IT experts, assistant, procurement agent, procurement manager, customer service representative, accounting expert, tax expert, accounting and tax manager, finance expert, back office representative, innovation expert

Data Controller III:

UNION Vienna Insurance Group Biztosító Zrt. employees, experts

Data Controller IV:

Allianz Hungária Zrt. employees, experts

Data Controller V.: employees, experts of Céginformáció.hu Kft.

The name, registered office, telephone number, website (where the privacy notice is available) and e-mail address of the data processor(s) and other data controller recipient(s):

VULOG S.A., The Crown, 21, Avenue Simone Veil, 06200 Nice, France - provision of ancillary services closely related to data processing, server services

The company contracted with VULOG S.A. to provide server services:

SAS OVH, 2 rue Kellermann - 59100 Roubaix - France

ADYEN B.V. Simon Carmiggeltstraat 6-50 1011 DJ Amsterdam The Netherlands - operation of an online payment system, provision of ancillary services closely related to data management, server services

MOL Hungary Company Services Ltd. (1117 Budapest, Dombóvári út 28.) Postal services.

MOL IT & Digital GBS Kft. (1117 Budapest, Dombóvári út 28.) - provision of ancillary services closely related to data processing

MOL GBS Hungary Ltd. (1117 Budapest, Dombóvári út 28.) - provision of ancillary services closely related to data processing

MOL Fleet Solution Kft. (1117 Budapest, Dombóvári út 28.) - provision of ancillary services closely related to data processing

Mailchimp - The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA - direct marketing services

Batch - IMEDIAPP SA, 41-43 rue Beaubourg, 75003 Paris - Provision of direct marketing services in the form of push messages, display of general information in the form of push messages (e.g. GTC, Privacy Notice changes)

Supercharge Kft. - 1075 Budapest, Károly krt. 9. - providing ancillary services closely related to data management, providing a registration interface

Twilio Inc. - San Fransisco, California, U.S. - Providing SMS service to finalize registration

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

VULOG S.A.: contact@vulog.com , www.vulog.com

SAS OVH: www.ovh.com

ADYEN B.V.: support@adyen.com

MOL Magyarország Társasági Szolgáltatások Kft.: www.mol.hu

MOL IT & Digital GBS Ltd: ltu@mol.hu

MOL GBS Hungary Kft.: GBS_Info@MOL.hu MOL Fleet Solution Kft.: callcenter@molfleet.mol.hu

Mailchimp: dpo@mailchimp.com
Batch: support@batch.com

Supercharge Ltd: dataprivacy@supercharge.io

Twilio Inc.: support@twilio.com

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

VULOG S.A.: contact@vulog.com, www.vulog.hu

SAS OVH: www.ovh.com

ADYEN B.V.: https://www.adyen.com/contact MOL Hungary Company Services Ltd: dpo@mol.hu MOL IT & Digital GBS Kft.: dpo@mol.hu

MOL GBS Hungary Kft.: dpo@mol.hu MOL Fleet Solution MoL Fleet Solution Fleet Fleet Fleet Solution Fleet Flee

Batch: support@batch.com

Supercharge Ltd: dataprivacy@supercharge.io

Twilio Inc.: support@twilio.com

They are entitled to access the data at the Data Processor:

MOL IT & Digital GBS Kft.: infrastructure operations expert, call-center employee, IT expert

MOL Magyarország Társasági Szolgáltatások Kft.: customer service employee

MOL GBS Hungary Ltd.: accounting expert, tax expert

VULOG: project manager, technical expert, legal counsel, sales manager, business development and project management expert, IT manager, application development expert, IT experts, assistant, procurement agent, procurement manager, customer service representative

SAS OVH: Staff providing support for the service

ADYEN: accounting expert, tax expert, accounting and tax manager, financial expert, back office staff, innovation expert, IT expert, customer service staff MOL Fleet Solution Ltd.: operations manager, managing director, technical expert, claims expert Mailchimp: staff providing a specific service

Batch: staff providing a given service

Supercharge Ltd.: employees providing a given service Twilio Inc.: employees providing a given service

Processing of special personal data(s) for the purposes set out in this Privacy Notice:

Description of the data processing process:

1. Electronic contracting, use of services, provision of services, related Push messages (messages sent by mobile application to the mobile phone screen) to the user (e.g. GTC, Privacy Notice has been modified), billing and contact

The processing of data technically necessary for the secure use of the service provided by MOL Limitless Mobility Ltd. for consideration - in the framework of which the Service Provider provides vehicles to Users under a rental contract - through a mobile application and, in this context,

for the electronic registration, the conclusion of the contract for the service by electronic means, the use of the service and the provision of the service. MOL Limitless Mobility Ltd. processes vehicle location (geolocation, GPS) data for the purpose of the performance of the contract. The geolocation data may be linked to information about which renter is using the car, therefore the geolocation data is considered as personal data.

After downloading the App and logging in to the App, the App will pop up a window asking you to allow the App to use Location. The App can only be used and the service can only be used if the User allows the App to use Location. The App will only use Location as a default setting if the App or a feature of the App is visible on the display, unless otherwise configured by the User (see: can be checked in the phone's location settings).

The Service Provider informs the User that the credit/debit card data provided by him/her will be processed by Adyen B.V. in possession of a PCI DSS certificate and in accordance with the technical conditions applicable to it.

If the User consents to this in the application, the Service Provider will also communicate general information concerning the use of the service to the User via the application in the form of push messages, for example, if the General Terms and Conditions or the Privacy Policy have been amended regarding the use of the service, the Service Provider will also inform the User of this in this way.

The MOL Limo User may earn loyalty points for certain trips in the MOL MOVE loyalty program, the rules for which are available in the following GTC and in the Privacy Notice:

GTC (molmove.hu), Privacy Notice (molmove.hu)

Data processing purposes for the performance of the contract:

- i. User can rent the vehicle. The User will then be able to see the location of the vehicles available for rent in the LIMO-Zone delimited by the use of so-called "geofencing". The User will also see exactly how far the LIMO Zone extends from where.
- ii. Notification of leaving the LIMO Zone: notification to the User that he/she has left the LIMO Zone because the conditions of use of the Service outside the LIMO Zone have changed.
- iii. The Service Provider can identify the location of the vehicle after the expiry of the rent. The next User can rent the vehicle from this location.
- iv. If the User has only suspended the journey, i.e. parked the vehicle ("stopover"), but does not end the rental, the Service Provider can pay the parking fee applicable in the area concerned based on the identification of the location of the vehicle.
- If the User parks outside the LIMO Zone, the User shall pay the parking fee applicable in the area. However, if the User parks within the LIMO zone, the parking fee shall be paid by the Service Provider.
- v. If the User has a complaint about the Service, the Service Provider can investigate it more effectively if it has the Location Data.

If the Service Provider knows the exact position of the User, it is more likely to be able to help the User in case of a problem. For example: if the User complains that he cannot lock the vehicle, calls the Customer Service and the Customer Service Representative does not see the GPS coordinates of the vehicle in the system, he can advise the User to park the vehicle somewhere else, where the GPS signal is received, because his current parking position is not correct.

2. Complaints handling

Please note that we are required by law to process certain data relating to your complaint.

For all communications with Customer Service, please refer to the Privacy Notice at the following link:https://www.mollimo.hu/pdf/HU/MOL-LIMO UGYFELFELSPOLGALAT Adatadadvedelmi Tajekoztato 20200323.pdf

Individual complaints can be submitted to the MOL Limitless Mobility Ltd. customer service department in a written form, via e-mail or telephone. There are several levels of complaint handling. If a complaint is received by telephone, the Service Provider will inform the User or other party making the call prior to the call that the call will be recorded. If the User does not want the telephone conversation to be recorded, he/she has the possibility to terminate the call and contact the Service Provider in writing.

Other provisions on complaint handling are set out in the General Terms and Conditions and Privacy Notice (hereinafter: GTC) entitled "Complaints Handling, Customer Service" and in the Customer Service Data Handling Information "MOL Limo Customer Service - Privacy Notice".

3. Direct marketing

If the User has expressly and voluntarily consented, MOL Limo will send the User electronic newsletters, direct marketing or other marketing content. This content will also be displayed in the form of a push message in the phone application if the User has expressly consented to this when using the phone application. The User can give his/her consent to the display of marketing content via the application by clicking on the "Enable notifications" button when downloading/opening the application, which is then displayed on the phone.

4. Checking the existence of a valid driving licence

You can cancel or modify it under the "settings/notifications" tab.

Compliance with paragraphs (2)-(3) of Article 5 of Act I of 1988 on Road Transport, and to this end, checking whether the User has a valid driving licence. The data controller, as the owner of the vehicle, shallnot allow a person who does not have the required driving licence to drive the vehicle, in accordance with the above-mentioned legislation.

Interest test: the data controller's obligation as the owner of the motor vehicle, pursuant to paragraphs (2)-(3) of Article 5 of Act I of 1988, is to:

- "(2) A person may drive a vehicle on a public road if he is in a fit state to drive safely and has the licence required to drive the vehicle.
- (3) The owner shall not permit the vehicle to be driven or the driver shall not transfer the driving of the vehicle to a person who does not meet

the conditions referred to in paragraph (2)."

On the basis of the above, the data controller has a legitimate interest in verifying the data on the driver's licence provided by the data subject by uploading the image of the driver's licence into the system. The data controller should process the image of the driver's licence for the duration of the verification, up to 24 hours after the registration. It is in the interest of the data subject to protect his/her personal data. On the basis of a comparison of the two interests, it can be concluded that the interest of the data subject is not disproportionately affected by the fact that the controller checks the driving licence data provided by the data subject when uploading the driving licence and the validity of the driving licence in order to ensure that the requirements of paragraphs (2)-(3) of Article 5 of Act I of 1988 on Road Transport are met.

5. Requesting a copy of the address page of your address card (official proof of address) for verification purposes

The Data Controller is aware of some of the data other than the address (e.g. date of birth) on the address card for other data processing purposes, but requests the User to mask the data other than the address, place of residence, name.

The Data Controller shall store the copy of the address card of the data subject uploaded to the system only for the time strictly necessary to verify the data, for 24 hours after registration, after which the copy of the address card shall be permanently deleted from the system.

It is in the legitimate interest of the Data Controller to prevent misuse and to enforce any legal claims that may arise based on the User's address. During the registration of the User, the Data Controller checks whether the address provided by the User in the system and the address on the address card match, and whether the User can actually be reached there.

6. Data processing in relation to notifications

If the Data Controller starts an ethics investigation, the members of the Ethics Board will have access to the data necessary for the investigation. If the Data Controller initiates other procedures to prevent, detect and investigate fraud and abuse, employees of the Region Security, Group Security and Internal Audit organisations will have access to the data necessary for the investigation.

If the investigation involves other MOL Group members and the company in question asserts a legal claim on the basis of the investigation, the HR organisation of the company in question and the legal organisation of the Company will have access to the data.

7. Enforcement of legal claims

In the event of any dispute or question arising in connection with the contract, it is essential to keep the data referred to in points (a) to (b) for the purposes of evidence, whether in or out of court. Given that the rules of civil procedure expressly provide for the obligation to take evidence [Para. (2) Art. 4 of the Civil Procedure Code], the possibility of taking evidence in the event of a contractual dispute or question needing clarification is not only not contrary to any form of law, but is expressly required by law.

i. The Service Provider may assert a claim against the User in the event of a breach of the GTC. Any fees, surcharges, costs or other fines will be imposed in the event of the User parking the vehicle improperly, and/or without paying the parking fee, or driving the vehicle improperly,

or in the event of the initiation of misdemeanour or criminal proceedings or other damages.

ii. If the User has a complaint about the Service, the Service Provider can investigate it more effectively if it has the Location Data. If the Service Provider knows the exact position of the User, it is more likely to be able to help the User in case of a problem. For example: if the User complains that he cannot lock the car, calls the customer service and the operator there does not see the GPS coordinates of the car in the system, he can advise the User to park the car somewhere else, where the GPS signal is received, because his current parking position is not correct.

Or, if the User has a complaint about the amount charged - see for example: the charge for parking in an irregular place - the Service Provider can better investigate the legitimacy of this.

In the case of a claim that includes an insurance event, the insurance company acting as data controller shall process the personal data pursuant to Article 135 of Act LXXXVIII of 2014 on Insurance Activities.

In the course of the enforcement of legal claims, the attorney-at-law or law firm acting as a data controller shall process the relevant personal data in accordance with point a) paragraph (1) of Article 2 of Act LXXVIII of 2017 on the professional activities of attorneys-at-law and and paragraph (1) of Article 64 and point a) of Article 65. of Act CXXX of 2016 on Civil Procedure (Civil Procedure Act), as well as paragraph (1) of Article 1 of Act L of 2009 on the order for payment procedure referring back to this provision of the Civil Procedure Act and Article 9 of Act LIII of 1994 on Judicial Enforcement.

8. Complying with a public authority request

It is in the legitimate interest of the public authority or other public body that requests our company to carry out the proceedings pending before it, to be able to disclose the details of the case concerned. It is in the legitimate interest of our company to be able to comply with the authority's request and to provide the necessary data and details. The processing of data for this purpose is carried out for the period necessary for the enforcement of the legitimate interests of the authority as a third party, for the duration of the final and binding decision on the official proceedings. The authority concerned will be able to provide precise information on the processing of the data by the requesting authority and its details.

9. Checking the existence of your SOTE card

The Data Controller offers a 10% discount on current prices for SOTE students and Limo users. In order to set this up and to justify the reference to the discount, it is necessary to verify the SOTE card, which is processed on the basis of legitimate interest pursuant to point (f) paragraph (1) of Article 6 of the GDPR. The legitimate interest of the controller is to check the card in order to provide the discount to SOTE students and to promote the service to them. The data controller stores the following data for the purposes of this processing: the front of the SOTE card, the name on the card, the photo. The Data Controller will store the photo sent from the front of the SOTE card only for the time strictly necessary to verify the data, up to a maximum of 24 hours from the setting of the discount, and in the case of registration, up to 24 hours after the

registration is finalised, after which the photo of the card will be permanently deleted from its system.

10. Keeping a list of Users who are in breach of contract

The User will be included in this list if he/she has violated the provisions of the GTC and, as a result, the Data Controller has suspended his/her User account and/or terminated the Framework Agreement with him/her by extraordinary termination.

The Data Controller stores the User's personal data in a hashed, encrypted form in order to prevent the User who is in breach of the Contract from using the Service for a certain period of time or from entering into a Framework Contract again.

The Data Controller compares the hash with the data of the registering User in order to determine whether the registrant can be linked to the person on the list of Users who are in breachof contract. If so, registration will be refused.

Personal data will be stored in a hashed, encrypted form for 5 years from the date of inclusion on the list of Users who are in breach of contract.

In certain cases set out in the GTC, the Data Controller will process the hash generated from the User's personal data for a period of 50 years from the date of inclusion on the list of Users who are in breach of contract, in particular, but not limited to:

driving without a driving licence, driving under the influence of alcohol or other intoxicating substances, intentionally or with serious negligence damaging a vehicle. The Data Controller does not consent to the use of the Service or the re-entry into a Framework Contract by Users who have engaged in such conduct.

Data transfer:

From MOL Fleet Solution Kft. to UNION Vienna Insurance Group Biztosító Zrt.

From MOL Fleet Solution Kft. to Allianz Hungária Zrt.

from MOL Limitless Mobility Kft. to MOL Plc.

from MOL Limitless Mobility Kft. to Céginformáció.hu Kft.

By Mailchimp - The Rocket Science Group, LLC in accordance with its Privacy Notice. https://mailchimp.com/

from Supercharge Ltd. to Twilio Inc.

Data transfers to third countries:

from MOL Limitless Mobility Ltd. to Mailchimp - The Rocket Science Group, LLC.

The Processor may have access to certain personal data in third countries, in which case the Processor will ensure an adequate level of data protection as follows:

https://mailchimp.com/help/mailchimp-european-data-transfers/

from Supercharge Ltd. to Twilio Inc.

The Processor may have access to certain personal data in third countries, in which case the Processor will ensure an adequate level of data protection as follows:

https://www.twilio.com/gdpr

The fact that automated decision-making, including profiling, is taking place and, at least in these cases, clear information on the logic used and the significance of such processing and its likely consequences for the data subject: -

Data security measures:

Information security	Policies to ensure the confidentiality, integrity and availability of organisational information,			
management system	by implementing processes, process descriptions, organisational structures, software and hardware			
	functions.			
Physical access	Ensuring the protection of physical assets that contain data relating to MOL Group.			
Logical access	Ensuring that only approved and authorised users have access to MOL			
	Group data used by your companies.			
Data access	Ensuring that only approved and authorised users have access to data used by MOL Group companies.			

Data transfer / storage / erasure	To ensure that MOL Group company data is not transmitted, read, modified or erased by unauthorised persons while it is being transferred or stored. In addition, MOL Group company data must be deleted promptly when the purpose of processing ceases.
Confidentiality and integrity	To ensure that when processing MOL Group's corporate data, data is treated confidentially, kept up to date, and to preserve their integrity.
Contact	To ensure that MOL Group's corporate data is protected against accidental destruction or loss and, in the event of an incident that could lead to such consequences, access to, and recovery of, relevant MOL Group Company Data is on time
Data separation	Ensuring that data of MOL Group companies is treated separately from data of other client data.
Incident management	In the event of any breach of the MOL Group's corporate data, the impact of the breach should be minimised and the effect of the breach will be minimized and the owners of the MOL Group Company Information will be notified immediately

Audit	Ensuring that the processor regularly tests, reviews and evaluates the technical
	and the organisational effectiveness of measures outlined above.

Your data protection rights:

Your data protection rights, your possibilities of seeking a legal remedy and the restrictions thereof 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 personal data processed at any time, request the rectification, erasure or the restriction of their processing, furthermore you can object to the data processing based on a legitimate interest and to the sending of direct marketing messages, and you have the right to data portability. Below is a summary of the most important provisions.

You may exercise your rights in relation to the processing of your data as set out below by sending a request to MOL Limitless Mobility Kft. at the following e-mail address: info@mollimo.hu

Right to information:

Where the Data Controller processes personal data, the Data Controller is obliged to provide you with information concerning the data relating to you - even without your request - on the most important features of the processing, such as the purpose, legal basis, duration of control, name and address 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 your possibilities of seeking a legal remedy(including the right to lodge a complaint with a supervisory authority) in relation to the processing, if you do not already have this information. In the case of automated decision-making and profiling, the data subject must also be informed of the logic used and be provided with clear information on the significance of such processing and the likely consequences for the data subject. The controller provides this information by making this privacy notice available to you.

Right of access:

You have the right to obtain confirmation from the Data Controller on whether or not your personal data are being processed and, if such data processing is taking place, access to your personal data and certain information relating to the processing, including the purposes of the processing, the categories ofpersonal data processed, the recipients of the personal data, the (envisaged) duration of the processing, the rights and possibilities of seeking a legal remedy 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 at your request.

In case of automated decision-making and profiling, the data subject has access to the following information: the logic used, the significance of such processing and the likely consequences for the data subject.

Right to rectification:

You have the right to have inaccurate personal data relating to you rectified by the Data Controller without undue delay upon your request. Taking into account the purpose 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 obtain from the Data Controller the erasure of your personal data concerning you without undue delay upon your request, and the Controller is obliged to erase your personal data 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 Controller; the personal data were collected in connection with the provision of information society services.

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

The User will no longer be able to use the service in case of withdrawal of consent.

In case of withdrawal of consent to direct marketing, the User will no longer receive direct marketing messages from the Service Provider. 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 restriction of processing:

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

- a) You contest the accuracy of the personal data, in which case the limitation applies for the period of time that allows the Controller to verify theaccuracy of the personal data;
- b) the processing is unlawful and you object to the erasure of the data and instead request the restriction of their use;

- c) the Controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims; or
- d) You have objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Controller prevail over your legitimate grounds.

If processing is restricted on the basis of the above, such personal data, except for storage, may 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 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.

Right to data portability:

You have the right to receive the personal data concerning you that you have provided to the Data Controller in a structured, commonly used, machine- readable format and the right to transmit such data to another Data Controller without hindrance from the Data Controller to whom you have provided the personal data, if:

- a) processing is based on your consent or on the performance of a contract (to which you are a party); and
- b) the processing is carried out by automated means.

In exercising your right to data portability, you have the right to request, where technically feasible, the direct transfer of personal data between controllers.

The right to data portability must be without prejudice to the provisions governing the right to erasure and must 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 Controller, including profiling based on the aforementioned provisions. In such a case, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. If you object to the processing of your personal data for direct marketing purposes, your personal data shall no longer be processed for those purposes.

How to exercise your rights:

The 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 extension, 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 therequest, 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 Nemzeti Adatvédelmi és Információszabadság Hatóság/the National Authority for Data Protection and Freedom of Information; "NAIH") and to exercise your right to judicial remedy. The contact details of the NAIH, 1055 Budapest, Falk Miksa utca 9-11., post address: 1373 Budapest, postal mailbox 9 Tel: +36 1 391 1400, Fax: +36-1-391-1410, Email: ugyfelszolgalat@naih.hu, website: http://naih.hu/

You can take legal action if your rights are infringed. The action falls within the jurisdiction of the Törvényszék (General Court). Upon the data subject's request the action can be brought before the Court which is competent based on the domicile or the place of residence of the data subject. The court may order the controller to provide information, to rectify, restrict or erase the data, to annul a decision adopted by means of automated data-processing systems, to honor the data subject's objection. The court may order the publication of its decision in such a way that the Controller or any other controller and the infringement committed by it can be identified.

The data controller concerned shall be liable for any damage caused to a data subject as a result of unlawful processing or by any breach of data security requirements. If the controller infringes your privacy rights by unlawfully processing your data or by breaching data security requirements, you may demand restitution from the controller concerned. The controller shall be exempted from liability if it proves that the damage was caused by or the infringement of the data subject's personality right is attributable to inevitable reasons beyond his control.

No compensation shall be paid and no restitution may be demanded . where the damage was caused by or the violation of rights relating to personality is attributable to intentional or negligent conduct on the part of the data subject.

II. On the processing of certain personal data generated in the course of the use of the service by Business Users in the framework of the cooperation with Business Customers/Corporate Clients

The following Privacy Notice is provided **as an ADDITION to the** Privacy Notice for the general use of the Service inSection I above, in the event that the Service is used by a Business User with a business account

Denomination and purpose of the data processing and	Legal basis for the data processing	Scope of the data processed	Duration processing of processing	Recipient of the data transfer	Data processor and data processing activities
Electronic contracting, use of the service, Provision of services, billing and communication	Performance of the contract is subject to point (b) paragraph (1) of article 6 of the GDPR In addition, this data processing is in	Data processed in addition to the above data in case of using Limo through Corporate Client: 1. if the Business User	The data processed based on the electronic conclusion of a contract, service the use of service, and the	In case of a business account Corporate Client.	Data processors indicated in point I of this privacy notice
	processing is in accordance with paragraphs (1)-(9) of Article 13/A of Act CVIII. of 2001 on certain aspects of electronic commerce services and information society services	Business User belongs to a member company of the MOL Group, its registration number, 2. the fact that the Business User has business account	provision of the service is stored in the active database for 7 days after the erasure of the user's account at the request of the user or the termination of the contract concluded with the Corporate Client.		
		3. Name of the Corporate Client4. Corporate Customer code in the system (Business ID)			

5. Corporate
Client's
corporate cost
centre,
to which the
Business
User belongs
(Business Cost
Center)
6. Business
User's email
address used for
Business Account
7. Business
User's business
account creation
date
8. Date of
erasure of the
Business User's
business account
9. Business
User travel date
10. Start and
end time of the
Business User's
journey
11. the
license plate
number of the
vehicle in which
the Business User
was travelling

Preventing, detecting and investigatingfr aud and abuse Preventing, detecting and investigating fraud and abuse of the service provided to Business Users, ensuring that Business Users using the service through Corporate Clients use the service only for purposes compatible with their work and investigating conduct that violates the MOL Group Code of Ethics and Business Conduct and the Business	Point (f) Paragraph (1) of Article 6 of the GDPR (processing is necessary for the purposes of the legitimate interests pursued by the controllers). Legitimate interest: to prevent, detect and hold accountable those responsible for irregularities that threaten the assets, trade secrets, intellectual property and business	12. Names, e-mail addresses of administrators provided by the Corporate Client. Source of the data: the Business User. The name of the Business User and, if the Business User belongs to a member of the MOL Group, his/her registration number, data related to the use of the service (in particular GPS data), data generated during the investigation. The data controllers shall process the data necessary for the investigation in order to detect	If the investigation reveals that the notification is unfounded or that no further action is necessary, the data relating to the notification shall be deleted within 60 days of the end of the investigation. If action is taken on the basis of the investigation, including legal proceedings or disciplinary	If MOL Plc. initiates an ethics investigation, the members of the Ethics Board shall have access to the data necessary for the investigation. MOL Plc (1117 Budapest, Dombóvári út 28.)	
and the Business Partner Code of	business reputation of	and investigate possible abuses of	disciplinary action against		

Ethics	data controllers,	the service for the	the reporting	
	as well as an	duration of the	person, data	
The MOL Group's Code	appropriate,	investigation	relating to the	
of Ethics and Business	respectful and	necessary for this	report will be	
Conduct, Business	fear- and	purpose.	kept in the	
Partner Code of Ethics,	retaliation-free		employer	
Ethics Council Code of	working		reporting	
Procedure ("Code of	environment.		system until the	
Ethics"), regarding the	The interest assessment		final and	
prevention and	test isattached as Annex		binding	
investigation of fraud	A to this Privacy Notice.		decision on the	
and abuse, are available			proceedings	
at			initiated on the	
https://mol.hu/hu/molro			basis of the	
l/etika- es-			report.	
compliant/ethics/,			Vehicle location	
			data will be stored	
			in an active	
			database for a	
			maximum of 7	
			days from the date	
			of termination of	
			the individual	
			rental contract,	
			and archived after	
			7 days, which may	
			be retrieved from	
			the archived	
			database for the	
			purpose of	
			preventing,	
			detecting and	
			investigating fraud	

or abuse related to
the service
provided to the
business user. The
duration of the
processing of GPS
data is also limited
to the time
necessary to carry
out the procedure,
but not longer
than the duration
of the business to
the user during the
period of use of
the service or for 5
years after the
termination of the
service.
The Service
Provider may also
transfer GPS data
for the
aforementioned
purpose to the
Business Customer
through whom its
Business User used
the vehicle.
The Service
Provider will only
1

The assertion of a legal claim by a data controller in relation to service provided to a Business User. This could be, for example, defense in proceedings/authority procedure started in relation to the service based on point e) paragraph (3) of Article	Legitimate interest of the data controller consent pursuant to Article point (f) paragraph (1) of Article 6of the GDPR The interest assessment test is available by clicking on the following link: https://www.mollimo.hu/hu/legal	In addition to the data processed for the purposes of legal claims as indicated in the privacy notice under point I., in case of thr the registration of an account The Data Controller	transfer the said data at the request of the Corporate Client and if it can demonstrate its legitimate interest. The period of time necessary to end the procedure, but not longer than 5 years from the termination of the contract, or the date of the breach. Any party may assert civil claims against	Corporate Client Data controllers indicated in the privacy notice under point I.	Data processors indicated in point I. of this privacy notice.
a Business User. This could be, for example, defense in proceedings/authority procedure started in relation to the service	6of the GDPR The interest assessment test is available by clicking on the following link: https://www.mollimo.hu/	indicated in the privacy notice under point I., in case of thr the registration of an account The Data	years from the termination of the contract, or the date of the breach. Any party may assert civil	1	privacy notice.

Business
Customer, it may
be necessary to
disclose the
Business User's
personal data
concerning the
use of the car.

<u>Data Controllers and Data Processors:</u> the Privacy Notice and the interest assessment tests are available at the Data Controllers' Customer Service or MOL Limitless Mobility Ltd. will make the documents available at the Corporate Client's designated information point at the Corporate Client's premises(s).

Data Controller I.: MOL Limitless Mobility Kft. (1117 Budapest, Dombóvári út 28.)

Data Controller II: MOL Plc (1117 Budapest, Dombóvári út 28.)

The data controllers (I and II) are considered as joint controllers, whereby they jointly determine the purpose and scope of the processing and are jointly responsible for the processing. The controllers have a joint privacy notice.

The data controllers indicated in the privacy notice for general use of the service under point I. Data Controller Corporate Client.

The contact person(s) of the controllers:

MOL Plc. e-mail address:ugyfelszolgalat@mol.hu MOL Limitless Mobility Kft. - info@mollimo.hu Corporate Customer

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

Data Controller I.:dpo@mol.hu **DataController II.** dpo@mol.hu

Data Controller Corporate Client

They have the right to access the data at the controller:

MOL Limitless Mobility Ltd.: executives, operations manager, car manager, customer service representative, sales and marketing manager

MOL Plc: project manager, product coordinator, technical expert, legal adviser, sales manager, business development and project management expert, IT manager, application development expert, IT experts, assistant, procurement agent, procurement manager, customer service representative, accounting expert, tax expert, accounting and tax manager, finance expert, back office representative, innovation expert

Corporate Client Employees

Name, seat, telephone number, website (where privacy notices are available) and email address of data processors:

The data processors indicated in point I. of the privacy notice regarding the general use of the service

<u>Contact person(s) of the data processor(s):</u> The contact details of the data processors indicated in point I. of the Privacy Notice regarding the general use of the service.

Name(s) and contact details of the Data Protection Officer(s) of the processor(s): as indicated in point I.

Theyhave the right to access the data at the Data Processor:

Indicated in point I. of the privacy notice for general use of the service. Transfer of data to a third country: as set out under point I.

Data security measures: as described under point I.

Your rights in relation to data processing: as set out in point I.