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

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

<table>
<thead>
<tr>
<th>Denomination and purpose of the data processing</th>
<th>Legal basis for data processing</th>
<th>Scope of the data processed</th>
<th>Duration of data processing</th>
<th>Recipient of the data transfer</th>
<th>Data processor and data processing activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic contracting, service usage, service provision, sending push messages to the user in the application (e.g. if Terms and Conditions, Privacy Notice has been modified), billing and contacting</td>
<td>Performance of the contract pursuant to point (b), paragraph 1 of Article 6 of the GDPR</td>
<td>First name, last name, user ID, date of birth, gender (optional), email address (contact), password (stored anonymously after identification), address, billing address, mobile phone number (contact and finalization of)</td>
<td>In the case of data processed on the basis of electronic contracting, service use, service provision and related push messages, we keep the data in an active database for 7 days after deletion of the</td>
<td>MOL Plc (1117 Budapest, Dombóvári út 28.), MOL Limo and MOL Plc. are considered as joint data controllers.</td>
<td>VULOG S.A., The Crown, 21, Avenue Simone Veil, 06200 Nice, France – ancillary service provision closely linked to the data processing server services. Company contracted with VULOG S.A. to provide server services: SAS OVH, 2 rue Kellermann - 59100 Roubaix - France</td>
</tr>
</tbody>
</table>
user, while using the application, gave consent to it.

services

registration), driving licence number, driving licence issue date

user account at the request of the data subject.


Céginformáció. huKft. (1191 Budapest, Üllői út 200., Cgj.: 01-09-065988, tax number: 10347036-2-43, info@ceginformacio.hu)

ADYEN B. V. Simon Carmiggeltstraat 6-50 1011DJ Amsterdam The Netherlands — operating the online payment system, ancillary service provision closely related to data processing server services

MOL Magyarország Társasági Szolgáltatások Kft. (1117 Budapest, Dombóvári út 28..) Postal services.

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

Provision of MOL systems.

MOL GBS Hungary Ltd. (1117 Budapest, Dombóvári út 28.)
<table>
<thead>
<tr>
<th>Company</th>
<th>Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>MOL Fleet Solution Kft.</td>
<td>Ancillary services closely related to the data processing, billing</td>
</tr>
<tr>
<td></td>
<td>(1117 Budapest, Dombóvári út 28)</td>
</tr>
<tr>
<td>Microsoft Hungary Ltd.</td>
<td>Online data storage, cloud services (1031 Budapest, Graphisoft Park 3,</td>
</tr>
<tr>
<td></td>
<td>01-09-262313, <a href="https://www.microsoft.com/hu-hu/contact.aspx">https://www.microsoft.com/hu-hu/contact.aspx</a> )</td>
</tr>
<tr>
<td>T-Systems Zrt.</td>
<td>Accounting, billing and operation and development of invoicing and</td>
</tr>
<tr>
<td></td>
<td>accounting</td>
</tr>
<tr>
<td>Céginformáció.hu Kft.</td>
<td>Claims management according to the contract with MOL Limitless Mobility</td>
</tr>
<tr>
<td></td>
<td>Kft., and the internal policies of MOL Limitless Mobility Kft.</td>
</tr>
<tr>
<td></td>
<td>Ancillary services closely related to the data processing, billing</td>
</tr>
<tr>
<td></td>
<td>MOL Fleet Solution Kft. (1117 Budapest, Dombóvári út 28)</td>
</tr>
<tr>
<td></td>
<td>Ancillary services closely related to the data processing, provision of</td>
</tr>
<tr>
<td></td>
<td>vehicles</td>
</tr>
<tr>
<td></td>
<td>webmail address: <a href="mailto:TS_ugyfelkapcsolat@t-systems.hu">TS_ugyfelkapcsolat@t-systems.hu</a>, company registration</td>
</tr>
<tr>
<td></td>
<td>no: 01-10-044852 ) - accounting, billing and operation and development</td>
</tr>
<tr>
<td></td>
<td>of invoicing and accounting</td>
</tr>
</tbody>
</table>
If the user has given his/her consent in the phone application.

https://batch.com/

Supercharge Kft. - 1075 Budapest, Károly krt. 9.
- Providing SMS service to finalize registration
https://www.twilio.com/

https://supercharge.io/contact

- Providing ancillary services closely related to the data processing:
  - Provision of the registration interface
  - Contact Interface
<p>| <strong>Complaints handling</strong> | Paragraphs (4)-(5) of Article 17/A. of Act CLV of 1997 on Consumer Protection (hereinafter referred to as the &quot;Consumer Protection Act&quot;) | User ID, first name, last name, home address, billing address, email address, mobile phone number, service platform: Android, IOS, web, vehicle location (GPS) data, the content of the record of the complaint pursuant to Paragraph (5) of Article 17/A. of the Consumer Protection Act | 3 years from the date of the complaint. Under paragraph (7) of Article 17/A of the Consumer Protection Act, the undertaking shall keep a record of the complaint and a copy of the reply for 3 years |</p>
<table>
<thead>
<tr>
<th><strong>Direct marketing</strong></th>
<th><strong>Article 17/A of the Consumer Protection Act</strong></th>
<th><strong>Consent of the data subject pursuant to point a) paragraph (1) of Article 6 of the GDPR</strong></th>
<th><strong>The data is deleted within 15 days from the withdrawal of consent.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Sending electronic newsletters, advertising, promotions, direct marketing or other marketing content or sending questionnaires to the User for the purpose of satisfaction measurement, market research or displaying them in an application, if the User has expressly consented to this during registration.</td>
<td>I. First name, surname, date of birth, gender, address, e-mail address, mobile phone number</td>
<td>The consent to the data processing is voluntary and must include explicit and unambiguous consent and be based on appropriate information.</td>
<td><strong>Mailchimp</strong> - The Rocket Science Group, LLC 675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA - direct marketing services <a href="https://mailchimp.com/">https://mailchimp.com/</a></td>
</tr>
<tr>
<td>II. If the User has given explicit consent to receive notifications in the phone application, marketing content in</td>
<td>II. IP address, user ID, operating system version, operating system language, mobile phone type, mobile operator name</td>
<td>The User can give consent to the display of marketing content via the application by clicking on the &quot;Enable notifications&quot; button when downloading/opening the application, which can be modified or withdrawn by under the &quot;settings/notifications&quot; tab.</td>
<td><strong>Batch</strong> - IMEDIAPP SA 41-43 rue Beaubourg, 75003 Paris - direct marketing services in the form of push messages <a href="https://batch.com/">https://batch.com/</a></td>
</tr>
<tr>
<td>the application can also be displayed as a push message.</td>
<td></td>
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<td></td>
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<tr>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Checking the existence of a valid driving licence</strong> <em>(for more detailed information on data processing, please see the section &quot;Description of the data processing process&quot;)</em></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legitimate interest of the data controller under point (f) paragraph (1) of Article 6 of the GDPR</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The interest assessment test is available by clicking on the following link: <a href="https://www.mollimo.hu/hu/legal">https://www.mollimo.hu/hu/legal</a></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Photograph of the driving licence of the service user - Copy of the front and back of the driving licence (The first purpose - to check driving licence details by uploading a copy of the driving licence.) A photograph of the service user on the front of the user’s driving licence and of user at the same time (to verify the identity of the service user and the owner of the driving licence, thus preventing fraud and abuse).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Data Controller shall keep a copy of the driving licence of the data subject uploaded to the system only for the time strictly necessary for the verification of the data - <em>for 24 hours</em> after registration - after which the copy of the driving licence and the photo of the front of the driving licence and the self-portrait shall be permanently deleted from the system.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Supercharge Kft.** - 1075 Budapest, Károly krt. 9. - ancillary services closely related to the data processing: providing the interface for registration
<table>
<thead>
<tr>
<th>Requesting a copy of the address page of the address card (official proof of address) for verification purposes</th>
<th>Legitimate interest of the data controller under point (f) paragraph (1) of Article 6 of the GDPR</th>
</tr>
</thead>
<tbody>
<tr>
<td>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. The interest assessment test is available by clicking on the link below: <a href="https://www.mollimo.hu/hu/legal">https://www.mollimo.hu/hu/legal</a></td>
<td>Copy of the address page of the address card, address (residence and/or domicile). The Data Controller is aware of some of the other data on the address card (e.g. date of birth) for other data processing purposes, but asks the User to cover the data other than the address, place of residence and name. The Data Controller stores a copy of the address card uploaded to the system only for the time strictly necessary to verify the data, 24 hours after registration, after which the copy of the address card is permanently deleted from the system.</td>
</tr>
<tr>
<td></td>
<td>Supercharge Kft. - 1075 Budapest, Károly krt. 9. - ancillary services closely related to the data processing: providing the interface for registration</td>
</tr>
</tbody>
</table>
Data processing in connection with notifications (for more detailed information on data processing, please see the section "Description of the data processing process")

Preventing, detecting and investigating fraud and abuse regarding the notifications and investigating conduct that violates the MOL Group Code of Ethics and Business Conduct and the Partner Code of Ethics.


| point (f) paragraph (1) of Article 6 of the GDPR (data processing is necessary for the purposes of the Company's legitimate interests). Legitimate interest: to prevent, detect and hold accountable those responsible for irregularities that threaten the Company's assets, trade secrets, intellectual property and reputation, and an appropriate, respectful and fearless non-retaliatory working environment. All personal data as defined in the previous purposes of data processing. 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. Where action is taken on the basis of the investigation, including legal proceedings or disciplinary action against the person making the report, the data in connection with the notification shall be processed in the employer's... | 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.) |
| **Legal claims (for more detailed information on data processing, please see the section "About the data processing process")** | The data controller's legitimate interest in the consent of the data subject under point (f) paragraph (1) of Article 6 of the GDPR. The interest assessment test is available by clicking on the following link: [https://www.mollimo.hu/hu/legal](https://www.mollimo.hu/hu/legal) | All the information in this prospectus; except for: password, billing address, debit card/credit card details listed in the first purpose. In case of a claim based on the legitimate 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 enforcement of legal claims. | In the event of a request from a public authority, forwarding the data requested to the public authority. The **Law Firm** acting in connection with the enforcement of legal claims. | Céginformáció.hu Kft. (1191 Budapest, Üllői út 200., Cj.: 01-09-065988, tax number: 10347036-2-43, info@ceginformacio.hu), claims management in accordance with the contract with MOL Limitless Mobility Kft. and the 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 (GPS) data will be archived after 7 days from the date of termination of the individual rental contract, and may only be used for the purposes of handling complaints or legal claims. In the event that the competent authorities initiate proceedings in connection with the individual rental contract in question or MOL Limitless Mobility Ltd. initiates proceedings, the data will be stored until the proceedings are

vehicles
<p>| Complying with a public authority request | point (f) paragraph (1) of Article 6 of the GDPR (processing of personal data is necessary for the purposes of the legitimate interests pursued by the Company and the public authority as third parties). | Of all the information contained in this notice, the official data specifically mentioned in the request. | The processing of data by public authorities or other authority, as a third party, for the period necessary to protect the legitimate interests of the third party, until the administrative procedure has been finally terminated. The Company will be able to provide precise information on the requesting authority, while the authority will be able to provide precise information on the data processing carried out by the Company. | The authority contacting our company. | MOL Fleet Solution Kft. (1117 Budapest, Dombóvári út 28.) - ancillary services closely related to the data processing provision of vehicles |</p>
<table>
<thead>
<tr>
<th>Activity</th>
<th>Interest Assessment</th>
<th>Data</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Checking the existence of the SOTE card</td>
<td>Legitimate interest of the data controller under point (f) paragraph (1) of Article 6 of the GDPR</td>
<td>The front of the SOTE card, name on the card, photo</td>
<td>The Data Controller stores the photo sent from the front of the SOTE card for the time strictly necessary to verify the data, up to 24 hours from the date of setting the discount in the case of registration, it is stored for 24 hours after the registration is finalised, after which the photo of the card is from your system permanently.</td>
</tr>
<tr>
<td>Maintaining a list of Users who are in breach of contract.</td>
<td>Legitimate interest of the data controller under point (f)</td>
<td>User's personal data in hashed, encrypted form.</td>
<td>The Data Controller stores the</td>
</tr>
</tbody>
</table>
A 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 means of an extraordinary termination.

The Data Controller stores the User’s personal data for this purpose only in hashed, encrypted form in order to ensure that the User who is in breach of contract cannot use the service for a certain period of time, cannot conclude a Framework Contract, thus the Data Controller can prevent the User from committing further breach of contract (e.g. drunk driving, other non-contractual use of vehicles).

The company makes the interest assessment test available on request.

The following personal data is encrypted and hashed:
- email address
- date of birth
- driving licence number
- address
- telephone number.

personal data in a hashed, encrypted form for 5 years from the date of inclusion on the list of Non-Contracting Users.

In certain cases, as set out in the GTC, the Data Controller processes the hash generated from the User’s personal data for 20 years from the date of placing the User on the list of Non-Contracting Users.

In particular, but not limited to: driving without a licence, driving while intoxicated,

The company makes the interest assessment test available on request.

The following personal data is encrypted and hashed:
- email address
- date of birth
- driving licence number
- address
- telephone number.

personal data in a hashed, encrypted form for 5 years from the date of inclusion on the list of Non-Contracting Users.

In certain cases, as set out in the GTC, the Data Controller processes the hash generated from the User’s personal data for 20 years from the date of placing the User on the list of Non-Contracting Users.

In particular, but not limited to: driving without a licence, driving while intoxicated,

It is in the legitimate interest of the Data Controller that the User who is in breach of contract cannot use the service for a certain period of time, cannot conclude a Framework Contract, thus the Data Controller can prevent the User from committing further breach of contract (e.g. drunk driving, other non-contractual use of vehicles).

The Data Controller stores the User’s personal data for this purpose only in hashed, encrypted form in order to ensure that the User who is in breach of contract will not be able to use the service for a certain period of time or to conclude a Framework Contract again.

The following personal data is encrypted and hashed:
- email address
- date of birth
- driving licence number
- address
- telephone number.

personal data in a hashed, encrypted form for 5 years from the date of inclusion on the list of Non-Contracting Users.

In certain cases, as set out in the GTC, the Data Controller processes the hash generated from the User’s personal data for 20 years from the date of placing the User on the list of Non-Contracting Users.

In particular, but not limited to: driving without a licence, driving while intoxicated,

It is in the legitimate interest of the Data Controller that the User who is in breach of contract cannot use the service for a certain period of time, cannot conclude a Framework Contract, thus the Data Controller can prevent the User from committing further breach of contract (e.g. drunk driving, other non-contractual use of vehicles).

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In certain cases, as set out in the GTC, the Data Controller processes the hash generated from the User’s personal data for 20 years from the date of placing the User on the list of Non-Contracting Users.

In particular, but not limited to: driving without a licence, driving while intoxicated,

It is in the legitimate interest of the Data Controller that the User who is in breach of contract cannot use the service for a certain period of time, cannot conclude a Framework Contract, thus the Data Controller can prevent the User from committing further breach of contract (e.g. drunk driving, other non-contractual use of vehicles).

The company makes the interest assessment test available on request.

The following personal data is encrypted and hashed:
- email address
- date of birth
- driving licence number
- address
- telephone number.

personal data in a hashed, encrypted form for 5 years from the date of inclusion on the list of Non-Contracting Users.

In certain cases, as set out in the GTC, the Data Controller processes the hash generated from the User’s personal data for 20 years from the date of placing the User on the list of Non-Contracting Users.

In particular, but not limited to: driving without a licence, driving while intoxicated,

It is in the legitimate interest of the Data Controller that the User who is in breach of contract cannot use the service for a certain period of time, cannot conclude a Framework Contract, thus the Data Controller can prevent the User from committing further breach of contract (e.g. drunk driving, other non-contractual use of vehicles).

The company makes the interest assessment test available on request.

The following personal data is encrypted and hashed:
- email address
- date of birth
- driving licence number
- address
- telephone number.

personal data in a hashed, encrypted form for 5 years from the date of inclusion on the list of Non-Contracting Users.

In certain cases, as set out in the GTC, the Data Controller processes the hash generated from the User’s personal data for 20 years from the date of placing the User on the list of Non-Contracting Users.

In particular, but not limited to: driving without a licence, driving while intoxicated,
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 Non-Contracting Users.

driving under the influence of any other mind-altering substance, damaging the vehicle intentionally or 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 may lawfully 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 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.: ugyfelszolgalat@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: ugyfelszolgalat@union.hu

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 Francisco, 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: itu@mol.hu
MOL GBS Hungary Kft.: GBS_Info@MOL.hu MOL Fleet Solution Kft.: calicenter@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 Kft.: dpo@mol.hu Mailchimp: dpo@mailchimp.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. You can cancel or modify it under the "settings/notifications" tab.

4. Checking the existence of a valid driving licence
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, shall not 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
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, the HR organisation of the Company, the legal 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 breach of 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:

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

<table>
<thead>
<tr>
<th>Data transfer / storage / erasure</th>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confidentiality and integrity</td>
<td>To ensure that when processing MOL Group’s corporate data, data is treated confidentially, kept up to date, and to preserve their integrity.</td>
</tr>
<tr>
<td>Contact</td>
<td>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.</td>
</tr>
<tr>
<td>Data separation</td>
<td>Ensuring that data of MOL Group companies is treated separately from data of other client data.</td>
</tr>
<tr>
<td>Incident management</td>
<td>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.</td>
</tr>
</tbody>
</table>
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 of personal 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 the accuracy 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 the request, of the reasons for the failure to take action and of your right to lodge a complaint with the competent data protection supervisory authority (in Hungary, the 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 in Section I above, in the event that the Service is used by a Business User with a business account.
<table>
<thead>
<tr>
<th>Denomination and purpose of the data processing and</th>
<th>Legal basis for the data processing</th>
<th>Scope of the data processed</th>
<th>Duration processing of processing</th>
<th>Recipient of the data transfer</th>
<th>Data processor and data processing activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic contracting, use of the service, Provision of services, billing and communication</td>
<td>Performance of the contract is subject to point (b) paragraph (1) of article 6 of the GDPR</td>
<td>Data processed in addition to the above data in case of using Limo through Corporate Client: 1. if the Business User belongs to a member company of the MOL Group, its registration number, 2. the fact that the Business User has business account, 3. Name of the Corporate Client 4. Corporate Customer code in the system (Business ID)</td>
<td>The data processed based on the electronic conclusion of a contract, service the use of service, and the 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.</td>
<td>In case of a business account Corporate Client.</td>
<td>Data processors indicated in point I of this privacy notice</td>
</tr>
</tbody>
</table>
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 investigating fraud and abuse** | **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 reputation 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 and investigate possible abuses 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 Partner Code of Conduct.

12. Names, e-mail addresses of administrators provided by the Corporate Client.

Source of the data: the Business User. | 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 action against those responsible for irregularities that threaten the assets, trade secrets, intellectual property and business reputation of the Business User, the MOL Group Code of Ethics and Business Conduct and the Business Partner Code of Conduct, the data controllers shall process the data necessary for the investigation in order to detect and investigate possible abuses 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 Partner Code of Conduct.

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)** |
Ethics

The MOL Group's Code of Ethics and Business Conduct, Business Partner Code of Ethics, Ethics Council Code of Procedure ("Code of Ethics"), regarding the prevention and investigation of fraud and abuse, are available at https://mol.hu/hu/molrol/etika-es-compliant/ethics/, data controllers, as well as an appropriate, respectful and fear- and retaliation-free working environment. The interest assessment test is attached as Annex A to this Privacy Notice.

the service for the duration of the investigation necessary for this purpose.

the reporting person, data relating to the report will be kept in the employer reporting system until the final and binding decision on the proceedings initiated on the basis of the report. 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
| 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 17 of the GDPR. | Legitimate interest of the data controller consent pursuant to Article point (f) paragraph (1) of Article 6 of 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 processes the data specified in the first purpose of data processing. Source of the data: the Business User. 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 data controllers for this period pursuant to Section 6:22 of Act V of 2013 on the Civil Code ("Civil Code"). In order to enforce a contractual legal claim between the Service Provider and the | Corporate Client Data controllers indicated in the privacy notice under point I. Data processors indicated in point I. of this privacy notice. |
Business Customer, it may be necessary to disclose the Business User's personal data concerning the use of the car.

**Data Controllers and Data Processors:** 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

Contact person(s) of the data processor(s): 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.

They have 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.