

## NOTICE ON THE PROCESSING OF PERSONAL DATA

**Dear Customer,**

The purpose of this notice is to provide detailed and clear information to all natural persons (“Natural Persons”) who, as registered operators or owners of a particular motor vehicle, have received a payment notice by mail from the National Toll Payment Services Plc. (“NTPS Plc.”) due to unauthorised use (lacking an e-vignette) of a toll section for which the use of an e-vignette is required. As a data controller, NTPS Plc. processes the Natural Person’s personal data according to the relevant legal provisions (“Data Processing”), for the purpose of recovering the enforceable fines.

### **I. Legal background:**

As a company in 100% public ownership, NTPS Plc. is appointed and authorised by law to perform, on behalf of the Hungarian State, the toll charger, toll enforcement and fine collection functions of the time-based road use system (“TT or e-vignette system”) in accordance with Act I of 1988 on Road Transport (“Public Roads Traffic Act”) and Decree 36/2007 (III.26.) of the Ministry of Economy and Transport (GKM) on the User Charges Payable for the Use of Motorways, Expressways and Main Roads (Toll Decree).

The entity authorised to enforce the payment of user charges inspects the appropriate authorisation and its purchase based on the registration number, country code and the toll category.

The inspection may be carried out as a roadside inspection by the mobile inspector of NTPS Plc., or through an automatic comparison performed by a secure, closed system whereby the registration number on the photograph recorded by fixed or mobile cameras (camera inspection) installed along the toll road sections is compared with the registration number data in the road use sales database.

As a result of the inspection, with a view to establishing liability for the payment of the fine in question, NTPS Plc. will establish the data of the obligated party and the vehicle

(a) by way of his or her documents suitable for personal and vehicle identification (for roadside inspections) or data reporting from an authentic registry (camera inspection), or

(b) in the case of vehicles with a foreign registration number, where no other means are available, by way of an intermediate body.

In the context of the above process, NTPS Plc. will only obtain personal data in connection with the identification during roadside inspection, or after comparing the registration number on the photograph and the registration numbers stored in the e-vignette sales database when the database automatically returns the name and address data for the operator (owner) of the motor vehicle identified by the automated system as unauthorised user of the road, i.e. Data Processing by NTPS Plc. (via its mobile inspection and fine collection staff) begins only from that date and time.

In the course of its data processing, NTPS Plc. is required to comply with the provisions of Act CXII of 2011 on informational self-determination and the freedom of information (Privacy Act), as well as of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) as well as the provisions by the relevant sectoral and other civil law regulators.

### **II. Purpose, scope, legal basis and duration of data processing:**

Pursuant to Article 33/B (4) of the Public Roads Traffic Act, the **purpose of Data Processing** is to verify toll payment and to initiate the procedure for the recovery of fine claims or fine difference claims under the competence of NTPS Plc.

Description of personal data	Legal basis for data processing	Duration of data processing
registration number	Fulfilling the statutory legal obligations of NTPS Plc. for toll enforcement and fine collection activities as a public service	until the expiration of the claim (2 years) or for the duration of the 60-day limitation period from the date the operator was identified
Name and address of the Natural Person		

Address data means both the Natural Person’s permanent address and place of residence.

### III. Persons employed by the Controller in the data processing, the Processor:

The fine collection staff and managers of NTPS Plc. are authorised to perform data processing.

Concerning those vehicles and/or those registered operators/holders of the vehicles (owners) that have a foreign nationality, NTPS Plc. had assigned the following Data Processors as assignees to act on behalf of NTPS Plc. regarding its fine collection activity (pursuant to Article 33/B (5) of the Public Roads Traffic Act and Article 7/A (5) b) of the Toll Decree). Such Data Processors are involved in the above data processing, with whom NTPS Plc. as the Data Controller has a contractual relationship, in compliance with the GDPR:

a) business entities involved in fine collection:

**aa) Euro Parking Collection plc**

data processing activity: detecting the effective data of name and address of the foreign vehicles affected by the unauthorised use of the road in Hungary, sending payment notices related to unpaid fees and fines

duration of data processing: as written in Section II above or until the withdrawal of the assignment

registered office of the data processor: Unit 6, Shepperton House, 83-93 Shepperton Road, London N1 3DF, United Kingdom

**ab) PETKOV & Co. s.r.o.**

data processing activity: detecting the effective data of name and address of the foreign vehicles affected by the unauthorised use of the road in Hungary, sending payment notices related to unpaid fees and fines

duration of data processing: as written in Section II above or until the withdrawal of the assignment

registered office of the data processor: Na vřrskú 12, 811 01 Bratislava, Slovak Republic

**ac) Ungarische Autobahn Inkasso GmbH**

data processing activity: detecting the effective data of name and address of the foreign vehicles affected by the unauthorised use of the road in Hungary, sending payment notices related to unpaid fees and fines

duration of data processing: as written in Section II above or until the withdrawal of the assignment

registered office of the data processor: 84307 Eggenfelden, Schellenbruckplatz 49, Germany

b) Contact details for the Data Controller's **data protection officer**:

[dpo@nemzetiudj.hu](mailto:dpo@nemzetiudj.hu), tel.: +36 1 4368 000

Additional information concerning the data protection officer can be found at <http://www.toll-charge.hu/articles/article/privacy-policy-1> or may be requested in writing (by e-mail).

### IV. Customer's rights related to data processing:

You have the following rights and enforcement options regarding data processing:

1. **Right to information.** Pursuant to Article 15 (1) of the GDPR.
2. **Right to request a copy.** Pursuant to Article 15(3) and (4) of the GDPR, you may request a copy of your personal data processed by NTPS Plc.
3. **Right to rectification.** Pursuant to Article 16 of the GDPR, we will amend and rectify your personal data at your request.
4. **Right to restriction.** You may request the restriction of data processing in accordance with Article 18 of the GDPR.
5. **Common rules for the exercise of rights.** NTPS Plc. will act upon your request within a month. This deadline may be extended by a maximum of two months.

### V. Enforcement options

If you believe that NTPS Plc.'s data processing is not in compliance with legal requirements, you may initiate proceedings with the National Authority for Data Protection and Freedom of Information (mailing address: H-1530 Budapest, Pf. 5, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

Furthermore, you have the right to initiate court proceedings regarding the data processing practices of NTPS Plc. You may initiate such proceedings, at your discretion, at the court competent at your place of residence or place of stay.