

**Information leaflet about processing of personal data regarding the operation of a monitoring camera system**

In accordance with articles 13 and 14 of the 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 (hereafter: GDPR) the Controller hereby provides the following information for the data subjects about the processing of personal data:

	<b>Controller</b>
<b>Name:</b>	Alpiq Csepel Kft.
<b>Registered seat:</b>	1085 Budapest, Kálvin tér 12.
<b>Postal address:</b>	1085 Budapest, Kálvin tér 12.
<b>E-mail:</b>	privacy.csepel@alpiq.com
<b>Telephone, fax:</b>	+36-1-429-10-30
<b>Web:</b>	www.csepel.alpiq.hu

**Legislation serving as basis for processing**

- **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**) (hereinafter: **GDPR**)
- **Act CXII of 2011 on Informational Self-Determination and Freedom of Information** (hereinafter: **Privacy Act**)

**Definitions – According to GDPR**

**„Personal data“:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**„recipient“** : means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**Personal data**

<b>Purpose of data processing</b>	<b>Categories of processed data</b>	<b>Duration of data processing</b>	<b>Data processing, legal basis</b>	<b>Source of data</b>	<b>Recipient (if any)</b>	<b>Purpose of disclosure (if there is a recipient)</b>
On the site of Company, operation of a monitoring camera system for providing the safety of persons and security of assets (preparation and use of image recording)	<u>Image:</u> Data generated by the operation of the monitoring system for providing the safety of persons and security of assets	Recording + 30 days	Legal interest of data controller	Directly the involved person	Acélpajzs Kft.	Data processing party who provides security service
					Companies of the Alpiq Csepel Business	Investigation into issues affecting several companies within the Alpiq Csepel Business

You, (or for persons under the age of 16 years, the parent having parental tutorage right), **when entering or driving into the sites in the area of Budapest under topographical lot numbers 210146/110 and 210146/78, being at 1211 Budapest, Hőerőmű utca 3. and 1211 Budapest, Terelő utca 23-27. (hereafter the Sites), acknowledge and accept present Information leaflet** which is communicated to you and available at the locations. Data processing for the above data processing purpose means the processing of the above personal data (that is, taking, recording, systematising, storing, using, enquiring for, forwarding, blocking, deleting, destroying and preventing later use).

**The provision of personal data and any request for such data are made for security reasons, and are subject to your decision. However, without those data we are unable to permit entry / driving in.**

In principle the provision of the personal data listed in the Table depends on the free choice of the data subject. If the provision of the personal data listed in the Appendix is a statutory or contractual requirement, or a requirement necessary to enter into a contract the data subject is obliged to provide the personal data listed in the Appendix, the consequences of failure to provide such data may be:

- data request for the purpose of discharging legal obligations: discharging the legal obligation may become impossible
- data request for the purpose of entering into a contract: failure to conclude a contract
- data request for the purpose of using services: refusal to provide services

**The data are not disclosed to a third country or any international organization.**

**No Automated decision-making or profiling is applied by the Controller.**

**Who can access Your personal data?**

**In principal the employees the Controller can access the personal data of the data subjects for the purpose of discharging their duties.** So personal data can be accessed for example by the Controller’s staff in charge of operating the filing system for administration purposes, or by its human resources staff for preparing labour contracts. The Controller may only disclose personal information to state agencies in exceptional cases. So, for example if a court proceeding is initiated

in a legal dispute between the Controller and the data subject and it is required to hand over to the court documents containing the data subject's personal data, the Controller is requested by the police authority to disclose personal data of the data subject for the purposes of an investigation. Furthermore for example personal data may also be disclosed to Controller's legal counsel providing legal representation in case there is a legal dispute between the Controller and the data subject.

### **Data Security Measures**

Controller stores personal data provided by the involved persons at the registered office of Controller.

At locations equipped with security cameras (in total, there are 25 cameras along the protected areas), there are icons put out to indicate the existence of cameras. Cameras are set up only on properties owned or used by the owner, with the purpose of providing the safety of persons and security of assets, and by preserving the dignity of people.

Data from the camera system is processed in a closed information technology system. Controller takes proper information technology measures to protect the personal data of involved persons against, among others, unauthorised access or modifications. Controller takes proper organisational measures to prevent access to such personal data by an indefinite number of persons.

## Your Rights

### **Under article 15 of GDPR data subjects may request access to their personal data as follows:**

(1) The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

(2) Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

**Under article 16 of GDPR data subjects may request rectification of their personal data from the Controller.** *The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.*

### **Under article 17 of GDPR data subjects may request the erasure of their personal data from the Controller as follows:**

(1) The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);

d) the personal data have been unlawfully processed;

e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

(2) Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

(3) Paragraphs 1 and 2 shall not apply to the extent that processing is necessary: a) for exercising the right of freedom of expression and information b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3) d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or e) for the establishment, exercise or defense of legal claims.

**Under article 18 of GDPR data subjects may request restriction of processing of their personal data from the Controller as follows:**

(1) The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;

b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or

d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

(2) Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's 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 reasons of important public interest of the Union or of a Member State.

(3) A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

**Under article 21 of GDPR data subjects have the right to object against the processing of their personal data to the Controller as follows:**

(1) The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the

controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

(2) Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

(3) Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

(4) At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

(5) In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

**Under article 20 of GDPR data subjects have the right to portability of their personal data as follows:**

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

a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and b) the processing is carried out by automated means.

(2) In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

(3) The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

(4) The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

**Under paragraph 2 of article 7 of GDPR data subjects have the right to withdraw their consent for processing their personal data at any time as follows:**

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.

**The right of data subjects for remedy in court and to lodge complaints with a single supervisory authority**

If a data subject find out about unauthorized data processing he or she may initiate civil procedure against the Controller. This procedure falls within the scope of regional courts. The civil procedure – depending on the choice of the data subject – may be initiated at the regional court competent where he or she is domiciled (you

can find the list and contact information of the regional courts via the following link: <http://birosag.hu/torvenyszekek>).

Without prejudice to other forms of administrative or court remedies every data subject is entitled to lodge complaints with a single supervisory authority – especially in the member state of residence, work place or where the suspected breach took place – if the data subject considers that the processing of his or her personal data is in violation of the GDPR.

***Hungarian National Authority for Data Protection and Freedom of Information***  
**(HNADPFI)**

address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c  
PO Box: 1530 Budapest, Pf.: 5

e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
telephone: +36 (1) 391-1400  
fax.: +36 (1) 391-1410  
web: [www.naih.hu](http://www.naih.hu)