

## Data Privacy Notice

(Data processing in connection with the performance of E.ON's e-mobility contract and online payment by credit card in E.ON's e-mobility application using OTP SimplePay)

- 1. Data Controller:** the controller means the legal person, which, individually or jointly with others, determines the purposes and means of the processing of personal data. In the context of this data privacy notice ("Notice"), controller means **E.ON MyEnergy Kft** (seat: 1117 Budapest, Hengermalom út 18.; registration no.: 01-09-328978; e-mail address: **adatvedelem@eon-hungaria.com**, website: **www.eon.hu**) ("Controller"). This Notice shall be applied in data processing by the Controller based on legal obligation and in accordance with the performance of the contract to which the Data Subject is party. Data Subject. Personal data are 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, by reference to an identifier or to one or more factors specific of that natural person. Some of the data processed by the Controller are personal data.
- 2. Basis for the processing:** in particular, Article 6 (1) point (b) of Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR") (processing data is necessary for the performance of a contract) and point (c) (processing is necessary for compliance with a legal obligation), as well as point (f) (legitimate interests of the Controller); Section 6:77 of Act V of 2013 of Hungary on the Civil Code ("Civil Code"); Section 169 of Act CXXVII of 2007 of Hungary on Value Added Tax ("VAT Act"); Section 169 of Act C of 2000 of Hungary on Accounting ("Accounting Act") and Section 2 of Government Decree 243/2019. (X. 22.) on certain issues of electronic charging services ("E-mobility decree"). The details of processing activities for each data processing purpose are presented below.
- 3. Personal data processed:** the Controller processes covered by this privacy Notice are listed in the table below.

The Controller may use segmentation (profiling) for the personal data created and collected under the contract signed by the Data Subject and the Controller to support its business portfolio management, develop its products and services, measure and improve customer satisfaction, improve processes and organise events. The Controller has not implemented and does not operate a decision-making process based on automated data processing; thus, segmentation shall not result in a unilateral decision that would have a legal effect on or significantly affect the Data Subject. During segmentation, the Controller shall use data relevant for a specific purpose; for example, segmentation may occur due to an event (the Data Subject has used a service in the given period or contacted Customer Support in connection with their contract), based on contract data (e.g. based on the amount of electricity consumed by the Data Subject), based on the geographic distribution of Data Subjects, or based on demographic data.

**Payment by a mobile device:** Please note in relation to data processing in mobile payments that in respect of the information contained in row 2 of the table in this Notice, E.ON Energiamegoldások Kft shall act as Controller for the data provided and stored in EON's e-mobility application. OTP Mobil Kft shall be considered a Data Processor in respect of such transferred data when the user is redirected to the SimplePay platform.

When during mobile payment you are redirected to the OTP SimplePay application, OTP Mobil Kft shall act as an independent Controller in regard to the personal data provided there that are necessary for payment by credit card. E.ON Energiamegoldások Kft shall not perform any data processing, data collection or other data processing activities in connection with payment by credit card, nor shall E.ON Energiamegoldások Kft have access to such personal data. During payment by credit card, you will be redirected to OTP's Mobile SimplePay secure payment site ("**OTP SimplePay**"). Payment shall be made directly on the site operated by OTP Mobil Szolgáltató Kft ("**OTP Mobil Kft**") in accordance with the rules and security regulations of international card companies.

Upon redirection, the Controller's online customer support shall transfer the data contained in row 2 of the table in this Notice to the operator of OTP SimplePay, OTP Mobil Kft. The purpose of the data transfer is to provide customer support to users, perform fraud-monitoring activities, confirm transactions and protect users.

Please note that the operator of the OTP SimplePay site, OTP Mobil Kft shall act as an independent Controller in regard to the personal data provided on the OTP SimplePay site. The personal data provided on the OTP SimplePay site shall be accessible only to OTP Mobil Kft. The information you need to provide on the OTP SimplePay site for successful payment includes: (i) credit card number; (ii) name of the credit card holder; (iii) the credit card's expiration date; (iv) the CVC/CVV code associated with the credit card, which you enter as a security code in a closed system for successful payment.

After successful payment, OTP SimplePay will redirect you to E.ON's online support page. After payment, E.ON Ügyfélszolgálati Kft. will send You a confirmation email containing the following information about the payment: (i) your user ID; (ii) your name; (iii) your account number; (iv) the amount on the invoice; (v) account type; (vi) the date and time of payment; (vii) the total amount paid.

4. **Period for which the personal data will be stored:** below we present the duration of data processing broken down by each processing purpose.
5. **Security of processing:** the Controller maintains IT security regulations to ensure the security of personal data of the Data Subject, that describes the conditions and principles of security of processing. Access to personal data is restricted according to authorisation management level by the Controller and the processor. Employees of Controller and processor have right to access the data defined by the Controller and processor, in pre-defined terms, according to their authorisation stages. In order to ensure the security of IT systems, the Controller shall use firewalls to protect the IT systems as well as antivirus and virus scanning software to prevent external and internal data loss. The Controller shall also make sure that incoming and outgoing electronic communications are properly controlled to prevent abuse. The Controller shall have the above-mentioned information security policy in place for managing potential data processing incidents. The Controller protects the IT systems with firewall for IT security and uses anti-virus programs to avoid internal and external loss of data. During the coordinated IT security actions, there is a special focus on: (i) operation and development security; (ii) avoiding leakage of data; (iii) business continuity; (iv) protection against malicious codes; (v) secure storage, transmission and processing of data; (vi) protection of entry and access; (vii) avoiding unentitled access; (viii) handling incidents; and (ix) training on information security of our employees. The personal data of the Data Subject are protected by based on risk assessment. High profile security actions and protective solutions are used to protect the personal data of the Data Subject during its whole lifetime. The Controller took steps to control outgoing and incoming electric communication to avoid abuse. The procedure of incident management is also included in IT security regulations. As the Controller, so the processor handle and define the personal data as confidential information.
6. **Data Processor:** a natural person or legal entity that processes personal data on behalf of the Controller. The following companies act as data processors ("**Processor**") in regard to your personal data:
  - **E.ON Ügyfélszolgálati Kft.** (seat: 1117 Budapest, Hengermalom út 18.; registration no.: 01-09-873382; e-mail address: [adatvedelem@eon-hungaria.com](mailto:adatvedelem@eon-hungaria.com), website address: [www.eon.hu](http://www.eon.hu)), which performs customer service activities and tasks related to customer protection proceedings.
  - **E.ON Hungária Zrt.** (seat: 1117 Budapest, Hengermalom út 18.; registration no.: 01-10-043518, e-mail address: [adatvedelem@eon-hungaria.com](mailto:adatvedelem@eon-hungaria.com), website: [www.eon.hu](http://www.eon.hu)), which provides legal, marketing and communication support to the members of the E.ON Hungária Group, and operates an internal audit, compliance, and abuse investigation system. As data processor, E.ON Hungária Zrt shall, during the performance of these central functions, have access to all personal data managed by the Controller that are required for legal advice, enforcing rights or investigations conducted by the internal audit department, Compliance and Abuse Investigation.
  - **E.ON Dél-dunántúli Áramhálózati Zrt.** (seat: 7626 Pécs, Búza tér 8/a., registration no.: 02-10-060025); az **E.ON Észak-dunántúli Áramhálózati Zrt.** (seat: 9027 Győr, Kandó Kálmán u. 11-13., registration no.: 08-10-001534); és az **Opus Titász** (seat: 4030 Debrecen Kossuth Lajos u. 41., registration no.: 09-10-000064) which provide operation services and breakdown services.
  - **E.ON Digital Technology Hungary Kft.** (seat: 1117 Budapest, Hengermalom út 18.; registration no.: 01-09-677830, website address: [www.eon.hu](http://www.eon.hu)), which operates the Controller's IT systems.
  - **E.ON Gazdasági Szolgáltató Kft.** (seat: 9027 Győr, Kandó Kálmán u. 11-13; registration no.: 08-09-014052), which performs data processing tasks related to the operation of the E.ON Hungária Group's central filing system, thus having access to all personal data that have been provided in writing (in contracts and written communications) to the Controller, and also supports activities related to the procurement of equipment.

- **OTP Mobil Kft.** (seat: 1143 Budapest, Hungária krt. 17-19., ; registration no.: 01-09-174466; email address: [ugyfelszolgalat@otpmobil.com](mailto:ugyfelszolgalat@otpmobil.com); website address: [www.otpmobil.hu](http://www.otpmobil.hu)) shall act as data processor in respect of the data provided by E.ON Energiamegoldások Kft.
- **VIRTA Ltd.** (Liikennevirta Oy, Business ID FI 25,889,862 Energiakuja 3 FI-00180 Helsinki, Finland) develops the e-mobility backend system (Virta backend) operated by the Controller.
- **Attrecto Zrt.** (9024 Győr Wesselényi u. 6; registration no.: 08-10-001846) develops the e-mobility application operated by the Controller (EON's e-mobility application front-end system).

In addition to the above companies, the current list of additional data processors used by Controllers can be found on the E.ON website at: [www.eon.hu/adatvedelem](http://www.eon.hu/adatvedelem).

- 7. Data Subject rights and right to appeal:** the Data Subject may apply to the Controller for the following: (i) information about processing their personal data; (ii) rectification of their personal data; (iii) erasure or restriction of their personal data, except if data processing is obligatory; (iv) in some cases, the Data Subject is entitled to data portability; and (v) the Data Subject may object to the handling of their personal data.
- The Controller shall inform the Data Subject according to legal regulations in the response period provided therein. Data Subject is entitled to request an investigation of the National Authority for Data Protection and Freedom of Information (<http://naih.hu>, 1530 Budapest, Pf.: 5; phone: + 36-1-391-1400; fax: + 36-1-391-1410; email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) in case of infringement of data protection regulation or if there is a material possibility of a breach. Data Subject is entitled to apply the court in case of infringement of personal rights, Data Subject may bring the case to court at the place where they live or are domiciled.
- We suggest submitting complain to the Controller before any of the steps mentioned above. The Controller has to inform the Data Subject without any unreasonable delay about the complaint, request or information about data processing. The deadline to respond can be extended pursuant to complexity and number of these requests, complaints and information. The Controller will inform the Data Subject about extending the time to respond and its reasons. If the Data Subject submits the request online, the answer must be electronic, except the applicants request to receive the response in a different manner. If the Controller does not take any actions pursuant to the request, it must inform the Data Subject without delay, but not later as legally prescribed period, about the reasons for this and the right to submit complaint or lodge a claim at the court. The name and contact details of the contact person (data protection officer) of the Controller for privacy issues can be found at <http://www.eon.hu/adatvedelem>.
- 8. Miscellaneous:** this Notice in force is available at <http://www.eon.hu/adatvedelem> and <http://eon.hu/driveon> websites, at E.ON's Customer Service offices and part of GTC in application. The Controller reserves the right to modify this Notice unilaterally for the future. The Data Subjects shall be informed of the changes via the Controller's website.

Budapest, 1 October 2023

Name and purpose of data processing	The legal basis for processing	The scope of processed data	The period for which personal data will be stored	Persons/entities given access to personal data
<b>Execution, performance and amendment of the e-mobility contract</b>	Processing personal data based on legal obligation and contract (Section 6:77 of the Civil Code; Section 7.§ (2) €, (f), (l); (3); 11.§ of the E-mobility Decree and the GDPR Article 6 (1) (b) and (c))	(i) name; (ii) billing address; (iii) phone number; (iv) email address; (v) the fact and date of acceptance of the GTC; (vi) the fact and date of acceptance of privacy notices and declarations; (vii) identification data (username, password, token ID); (viii) billing information (payment ID, charging station, date, charging details, bank account number); (ix) charging data (charging stations used, charger type, charge type, time, location, quantity, frequency); (x) vehicle data (type, charger type).	8 years after termination of the contract	(i) Employees of the Controller dealing with administrative processes, administrative support and control; (ii) employees of Data Processors dealing with the administrative process, administrative support and control.
<b>OTP SimplePay payment details in E.ON's e-mobility application</b>	Contract-related data processing (Section 6:77 of the Civil Code; Section 7.§ (2) €, (f), (l); (3); 11.§ of the E-mobility Decree and GDPR Article 6 (1) (b))	(i) name; (ii) country; (iii) phone number; (iv) email address; (v) billing information (payment ID, charging station, date, charging details).	8 years after termination of the contract	(i) Employees of the Controller dealing with administrative processes, administrative support and control; (ii) employees of Data Processors dealing with the administrative process, administrative support and control.
<b>Performance and support of billing activities in regard to an e-mobility contract</b>	Processing personal data based on legal obligation and contract (Section 6:77 of the Civil Code; Section 7.§ (2) €, (f), (l); (3); 11.§ of the E-mobility Decree and the GDPR Article 6 (1) (b) and (c))	(i) name; (ii) billing address; (iii) phone number; (iv) email address; (v) the fact and date of acceptance of the GTC; (vi) the fact and date of acceptance of privacy notices and declarations; (vii) identification data (username, password, token ID); (viii) billing information (payment ID, charging station, date, charging details, bank account number); (ix) charging data (charging stations used, charger type, charge type, time, location, quantity, frequency); (x) vehicle data (type, charger type).	8 years after termination of the contract	(i) Employees of the Controller dealing with administrative processes, administrative support and control; (ii) employees of Data Processors dealing with the administrative process, administrative support and control.

Name and purpose of data processing	The legal basis for processing	The scope of processed data	The period for which personal data will be stored	Persons/entities given access to personal data
<b>Liaising with customers with an e-mobility contract</b>	Contract-related data processing (Section 6:22 of the Civil Code and GDPR Article 6 (1) (b))	Data Subject: (i) name; (ii) phone number; (iii) email address.	1 year after termination of the contract	(i) Employees of the Controller dealing with administrative processes, administrative support and control; (ii) employees of Data Processors dealing with the administrative process, administrative support and control.
<b>Management of arrears and debts in regard to an e-mobility contract</b>	Processing personal data based on legal obligation and contract (Section 6:77 of the Civil Code; Section 2 of the E-mobility Decree and the GDPR Article 6 (1) (b) and (c))	The debtor's data: (i) name; (ii) mother's maiden name; (iii) place and date of birth; (iv) address; (v) details of the bills with a debt.	2 years in accordance with the limitation period. For acknowledged debts, 5 years in accordance with the limitation period	(i) Employees of the Controller dealing with administrative processes, administrative support and control; (ii) employees of Data Processors dealing with the administrative process, administrative support and control.
<b>Online identification of the customers without registration in the online Customer Service to use post payment</b>	Processing personal data based on legal obligation and contract and consent ( Section 6:77. of the Civil Code; Section 7. (2) (e), (f), (l) points (3) and 11., and 14. and GDPR Article (1) (a) and (b)).	The debtor's data: (i) name; (ii) mother's maiden name; (iii) place and date of birth; (iv) address; (v) photo taken of the Customer and the Customer's ID/passport/driving licence	3 days after the uploading of the data	(i) Employees of the Controller dealing with administrative processes, administrative support and control (ii) Data Processors dealing with the administrative process

Name and purpose of data processing	The legal basis for processing	The scope of processed data	The period for which personal data will be stored	Persons/entities given access to personal data
<p><b>Assignment of contractual rights and obligations arising under an e-mobility contract</b></p>	<p>Processing personal data based on legal obligation and contract (Section 6:77, 6:193.§, 6:196.§ of the Civil Code; Section 7.§ (2) €, (f), (l); (3); 11.§ of the E-mobility Decree and the GDPR Article 6 (1) (b) and (c))</p>	<p>The Data Controller as Assignor shall transfer the data necessary for assignment to the Assignee through a closed system. The Assignee shall replace the Data Controller based on the assignment. The Data Controller as Assignor shall provide prospective Assignees with the opportunity to purchase the portfolio ("Portfolio") in a package. After the successful transaction, the personal data affected by the assignment shall be transferred, such as: (i) name; (ii) mother's maiden name; (iii) place and date of birth; (iv) address of the obligor; (v) details of the bills with a debt. If additional information is required and the Assignor is available, the Assignor shall transmit the necessary information to the Assignee.</p>	<p>Until the portfolio is transferred.</p>	<p>(i) Employees of the Controller dealing with administrative processes, administrative support and control; (ii) employees of Data Processors dealing with the administrative process, administrative support and control.</p>
<p><b>Supporting business portfolio management, developing products &amp; services, measuring and improving customer satisfaction and improving processes</b></p>	<p>Legitimate interest of the Controller (GDPR Article 6 (1) (f)) and performance of the contract made by the Controller and the Data Subject (GDPR Article 6 (1) (b)). In some cases, data processing may involve segmentation (profiling).</p>	<p>(i) name; (ii) billing address; (iii) phone number; (iv) email address; (v) the fact and date of acceptance of the GTC; (vi) the fact and date of acceptance of privacy notices and declarations; (vii) identification data (PIN, username, password, token ID); (viii) billing information (payment ID, charging station, date, charging details, bank account number); (ix) charging data (charging stations used, charger type, charge type, time, location, quantity, frequency); (x) vehicle data (type, charger type).</p>	<p>During the life of the contract or for 1 year after termination of the contract</p>	<p>(i) Employees of the Controller dealing with administrative processes, administrative support and control; (ii) employees of the Data Processors who deal with the administrative process, administrative support, and control; (iii) market research conducted by a third-party Processor under a separate contract.</p>
<p><b>Event organization</b></p>	<p>Legitimate interest of the Controller and performance of the contract made by the Controller and the Data Subject (GDPR Article 6 (1) (b) and (f)).  In some cases, data processing may involve segmentation (profiling).</p>	<p>(i) name; (ii) address; (iii) email address; (iv) phone/mobile number; (v) name of the employer; (vi) accommodation and boarding information in connection with the event; (vii) photographs taken at the venue of the event</p>	<p>For 1 year after the event</p>	<p>(i) Employees of the Controller dealing with event organization, administrative processes, administrative support and control; (ii) employees of Data Processors dealing with administrative processes, administrative support and control.</p>

Name and purpose of data processing	The legal basis for processing	The scope of processed data	The period for which personal data will be stored	Persons/entities given access to personal data
<p><b>Obtaining consent to data processing, providing privacy information and updating consent to processing</b></p>	<p>Sending information to the Data Subject</p>	<p>(i) name; (ii) address; (iii) email address.</p>	<p>During the life of the contract or for 1 year after termination of the contract</p>	<p>(i) Employees of the Controller dealing with data protection, marketing, administrative processes, administrative support and control; (ii) employees of Data Processors dealing with administrative processes, administrative support, and control; (iii) the third-party Data Processor supplying the information under a separate contract.</p>
<p><b>Sending information to the Data Subject</b></p>	<p>Legitimate interest of the Controller (GDPR Article 6 (1) (f)); Section 6 (4) of Act XLVIII of 2008)</p> <p>The Data Subject may also separately object to receiving the privacy notice.</p>	<p>(i) name; (ii) address; (iii) email address.</p>	<p>Scope of the contract</p>	<p>(i) Employees of the Controller dealing with administrative processes, administrative support and control; (ii) employees of Data Processors dealing with administrative processes, administrative support, and control; (iii) the third-party Data Processor supplying the information under a separate contract.</p>