

## Privacy Notice

### on the personal data processed by MVM Next Energiakereskedelmi Zrt. in relation to the activities of Insurance activities

#### Introduction

The purpose of this Privacy Notice (hereinafter: Notice) is to describe the data process terms of the personal data processes by MVM Next Energiakereskedelmi Zrt. users

- from CIG Pannónia Életbiztosító Nyrt. (registered office: 1033 Budapest, Flórián tér 1., company registration number: 01-10-045857),
- from CIG Pannónia Első Magyar Általános Biztosító Zrt. (registered office: 1097 Budapest, Könyves Kálmán krt. 11. B. ép., company registration number: 01-10-046150),
- from Europ Assistance Magyarország Kft. (registered office: 1134 Budapest, Dévai utca 26-28., company registration number: 01-09-565790),
- from Europ Assistance S.A.-tól (registered office: France, 1 promenade de la Bonnette, 92230 Gennevilliers, registration number: 451-366-405)
- from Europ Assistance S.A. Irish Branch (registered office : Central Quay, Ground Floor, Block B, Riverside IV, Sir John Rogerson's Quay, Dublin 2, D02 RR77, Írország) (hereinafter together as Insurance Companies), as Independent Controllers,

regarding the available insurance products from MVM Next Energiakereskedelmi Zrt., as Independent Controller.

In addition to this Notice MVM Next Energiakereskedelmi Zrt.'s own data process information/ data protection regulation shall be applied to You, which can be found on website (<https://www.mvmnext.hu/Adatvedelem/adatvedelmi-tajekoztatok/adatvedelmi-tajekoztatasok>) and in all customer service offices of MVM Next Energiakereskedelmi Zrt.

Moreover the privacy notice/ data process information of the Insurance Company providing insurance is used by You shall apply to you, which can be found on websites of Insurances Companies (CIG Pannónia Insurance Company: <https://www.cigpannonia.hu/adatvedelem>, Europ Assistance Insurance Company: <http://www.europ-assistance.hu/hu/adatkezeles>).

#### 1. Description of the Controller, definition of personal data and Data Subject

The Controller means the legal person which, alone or jointly with others, determines the purposes and means of the processing of personal data.

In connection with this Notice the "**Controller**":

Controller:	<b>MVM Next Energiakereskedelmi Zrt.</b> (in this Notice hereinafter: <b>Controller or Energy Supplier</b> )
Registered office:	1081 Budapest, II. János Pál pápa tér 20.
Postal address:	1439 Budapest, Pf. 700
Company registration number:	01-10-140263
Website:	<a href="http://www.mvmnext.hu/nyitolap">www.mvmnext.hu/nyitolap</a> , mvmenergiakereskedo.hu, mvmaramkereskedo.hu
E-mail address:	ugyfelszolgalat@mvm.hu
Phone number:	+36 1/20/30/70 474 9999
Data Protection Officer:	Dezső dr. Arató (dpo@mvm.hu)

For the purposes of this Notice, personal data shall mean any information relating to an identified or identifiable natural person (the „**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).

## **2. The subject matter of this Privacy Notice, legislation under which the processing is performed**

**This Privacy Notice shall apply to the provisions of insurance products (Otthon SOS Assistance insurance, Úton SOS Accident Insurance, Otthon SOS Garancia extended warranty insurance, Otthon Cyber Protection, Otthon Gondoskodás Account Protection, Otthon Vitál Health Insurance, Otthon Alkony funeral insurance, Otthon Harmónia risk life insurance) by Controller specified in point 1) and/or requests for direct advertising by Controller specified in point 1.).**

**Data procession operations related to each insurance product are the tasks of the Controller, the tied agents (insurance intermediary) and processors:**

If You indicate at the insurance intermediary – as Insurance Company agent -, or at the Energy Service Provider that You wish to join the group insurance agreement and request a callback or e-mail information in connection with insurance products, and if You ask the Energy Service Provider to inform You about the offers, novelties and promotions concerning the insurance by means of a newsletter, the Energy Service Provider will inform You about the requested information on the basis of the data stored in its own system. Subscribing to the newsletter is not a condition of any service other than sending newsletters.

If You indicate at the insurance intermediary – as Insurance tied intermediary -, or at the Energy Service Provider, that You wish to join to the group insurance agreement and request the extension of the insurance to You, the Energy Service Provider shall undertake –based on the data provided by the insurance intermediary-to forward the data and information necessary for concluding the insurance agreement to the insurance company, and to send the confirmation to You - as connected insurance policy holder – via communication channel of your choice, and the relevant contracting terms.

The tied insurance intermediary is only entitled to process the personal data necessary for the concluding and maintaining of the agreement and to determine the entitlement to their remuneration during the process.

The Processors specified in point 9. are entitled to fulfil technical operations related to personal data on behalf of Controller, in accordance with the instruction and purposes received from the Controller, during this no decision shall not be taken on personal data. The Controller publishes the identification data of each processor, the scope of the data transferred to them and the list of performed technical operations updated on its website and makes it available to anyone. The identity of the processors may change during the term of the agreement.

**The statement of consent shall be withdrawn at any time, without restriction or justification, free of charge.**

**Main legislation relating to the processing activities and abbreviations used in this Notice:**

- 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**)
- Act CXII of 2011 on Informational Self-determination and Freedom of Information (Infotv.)
- Act LXXXVIII. of 2014 on insurance activity (Bit.)
- Act XLVIII of 2008 on basic conditions and certain restrictions of economic advertising activity (Gr.)
- Act CLV of 1997 on Consumer Protection (Fgytv.)

## **3. Legal basis for processing**

**The legal bases for our processing are point (a) of Article 6(1) of General Data Protection Regulation (processing based on Your consent).**

**The details of processing as per each purpose of processing are included in the table in point 12.**

#### **4. Purposes of processing**

**The purposes of processing in relation to the processing activities of Privacy Notice set out herein are specified in detail in the table of point 12.**

#### **5. Scope of processed data and the source of the data**

**The scope of processing in relation to the processing activities of Privacy Notice set out herein are specified in detail in the table of point 12**

During the use of insurance product, and the consent to the process of his or her personal data in this connection, the Data Subject shall provide his/her personal data to the Controller, so in this case the source of data is the Data Subject.

#### **6. Persons entitled to access data, the reasons for data transfer**

**The persons entitled to access data according to the Notice (they are entitled access within the Controller's organization and the external recipients) are listed in the table in point 12.**

In case of Processor detailed in point 9, the reason for data transfer by the Controller is that the Processor can perform the data processing activities described in point 9.

#### **7. The period of processing and storing the personal data**

The Controllers erase the personal data processed without delay if processing was performed not for the purposes stipulated by law or the purpose of processing no longer exists.

**The data processed based on the Data Subject's consent shall also be erased at any time upon the Data Subject's request**

**The period of processing under this Privacy Notice is specified in the table of point 12.**

#### **8. Security of personal data**

The Controller undertakes to ensure the security of personal data processed by it. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the Controller shall implement appropriate technical and organisational measures and develop appropriate procedural rules to ensure the protection of the recorded, stored and processed data and to prevent the destruction, unauthorised use and unauthorised alteration thereof.

The Controller also undertakes to request every third party to whom the data are transferred or disclosed based on the Data Subjects' consent to comply with the requirements of the security of personal data.

The Controller shall ensure that the processed data are not accessible to unauthorised persons, and cannot be disclosed, transferred, altered or erased by such persons. The processed data shall exclusively be accessible to the Controllers, their employees and the processor(s) engaged by them based on permission levels. The Controller shall not disclose such data to any third person not entitled to access the data. The employees of the Controller and the Processor may access the processed personal data based on the job roles specified by the Controller and the Processor, in a specified manner and as per the permission levels.

In order to ensure the security of the IT systems, the Controller protects such systems with firewall and also uses virus scanner and anti-virus programs in order to prevent internal and external data loss. The Controller has also taken measures to properly check the electronic incoming and outgoing communication to prevent abuse.

The Controller and the Processor deem personal data confidential and process the data as such. In order to ensure the protection of data sets processed electronically in various records, the Controller makes sure that the data stored in the records cannot be directly combined and associated with the user, with the exceptions stipulated by law.

The Controller shall ensure a level of security appropriate to the risk, including inter alia as appropriate:

- the pseudonymisation and encryption of personal data,
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services (security in terms of operation and development, intrusion control and detection, prevention of unauthorised access)
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident (prevention of data leak; vulnerability and incident management)
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing (maintenance of business continuity and the protection thereof against malicious codes; secure storage, transfer and processing of data; security-related training of our employees)

In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

## 9. Processors

The Processor means a natural or legal person which processes personal data on behalf of the Controller.

The following companies act as data processors ("**Processor**") in connection with your personal data at both Controllers:

Name and registered office of Data Processor	Activities carried out by Data Processor	personal data processed by Data Processor
MVM Otthon Plusz Zrt. 1023 Budapest, Árpád fejedelem útja 26-28.	Connecting of prospective policy-holders to Otthon SOS group assistance, Úton SOS accident insurance, Otthon SOS Garancia extended warranty insurance, Otthon Cyber Protection, Otthon Gondoskodás Account Protection, Otthon Vitál Health Insurance, Otthon Alkony funeral insurance, Otthon Harmónia risk life insurance, Otthon SOS Kedvenc pet insurance, Otthon SOS Aktív bicycle insurance (insurance mediation). She/ he is entitled to use the services of other agents (sub-agents) to perform his/her duties.	Customer identification, consumption place, connection ID, name, address, e-mail, phonogram, date of birth, place of birth, mother's name, name of chosen insurance package, relative's data: name, date of birth, place of birth, mother's name, registration number, type of vehicle, details of the beneficiary: name, date of birth, place of birth, mother's name
Photel Online Solutions Kft. 7100 Szekszárd, Széchenyi utca 40.	He/ she shall describe the product Otthon SOS Assistance insurance, Úton SOS Accident Insurance, Otthon SOS Garancia extended warranty insurance, Otthon Cyber Protection, Otthon Gondoskodás Account Protection, Otthon Vitál Health Insurance, Otthon Alkony funeral insurance, Otthon Harmónia risk life insurance, Otthon SOS Kedvenc pet insurance, Otthon SOS Aktív bicycle insurance to the customers as defined by the Insurance Company.	Customer identification, consumption place, connection ID, name, address, telephone number, phonogram l., e-mail, date of birth, place of birth, mother's name, name of chosen insurance package, relative's data: name, date of birth, place of birth, mother's name, registration number, type of vehicle, details of the beneficiary: name, date of birth, place of birth, mother's name

Name and registered office of Data Processor	Activities carried out by Data Processor	personal data processed by Data Processor
TeleMedia Kft. 1012 Budapest, Márvány u. 17.	He/ she shall describe the product of Otthon SOS group assistance, and Úton SOS accident insurance, Otthon SOS extended warranty insurance, Otthon SOS Kedvenc pet insurance, Otthon SOS Aktív bicycle insurance and Otthon Cyber Protection to the customers as defined by the Insurance Company.	Customer identification, consumption place, connection ID, name, address, telephone number, phonogram, date of birth, place of birth, mother's name, name of chosen insurance package, relative's data: name, date of birth, place of birth, mother's name, registration number, type of vehicle
TeleMedia Jobs Kft. 1012 Budapest, Márvány u. 17.	He/ she shall describe the product of Otthon Gondoskodás Account Protection, Otthon Vitál Health Insurance, Otthon Alkony funeral insurance, Otthon Harmónia risk life insurance to the customers as defined by the Insurance Company	Customer identification, consumption place, connection ID, name, phone number, address, e-mail, phonogram, date of birth, place of birth, mother's name, name of chosen insurance package relative's data: name, date of birth, place of birth, mother's name, details of the beneficiary: name, date of birth, place of birth, mother's name
Fon2Fon Kommunikációs Kft. 2724 Újlengyel, Ady Endre utca 41.	He/ she shall describe the product of Otthon SOS group assistance, Úton SOS accident insurance, Otthon SOS Garancia extended warranty insurance, Otthon Cyber Protection, Otthon Gondoskodás Account Protection, Otthon Alkony funeral insurance, Otthon Harmónia risk life insurance, Otthon SOS Kedvenc pet insurance, Otthon SOS Aktív bicycle insurance to the customers as defined by the Insurance Company.	Customer identification, consumption place, connection ID, name, phone number, address, e-mail, phonogram, date of birth, place of birth, mother's name, name of chosen insurance package relative's data: name, date of birth, place of birth, mother's name, registration number, type of vehicle, details of the beneficiary: name, date of birth, place of birth, mother's name
MVM Ügyfélkapcsolati Kft. 1081 Budapest, II. János Pál pápa tér 20.	He/ she shall describe the product of Otthon SOS group assistance, Úton SOS accident insurance, Otthon SOS Garancia extended warranty insurance, Otthon Cyber Protection, Otthon Gondoskodás Account Protection, Otthon Alkony funeral insurance, Otthon Harmónia risk life insurance, Otthon SOS Kedvenc pet insurance to the customers as defined by the Insurance Company	Customer identification, consumption place, connection ID, name, phone number, address, e-mail, phonogram, date of birth, place of birth, mother's name, name of chosen insurance package relative's data: name, date of birth, place of birth, mother's name, registration number, type of vehicle, details of the beneficiary: name, date of birth, place of birth, mother's name
MVM Zrt. 7030 Paks, Vasút u. 1.	Website operation, storage of newsletter database, operation of newsletter system.	Customer identification, consumption place, connection ID, name, phone number, address, e-mail, phonogram, date of birth, place of birth, mother's name, name of chosen insurance package, relative's data: name, date of birth, place of birth, mother's name, registration number, type of vehicle, details of the beneficiary: name, date of birth, place of birth, mother's name

The Processors shall be entitled to process the above personal data during the term of its contract concluded with the Controller and for a related period specified by the law.

## **10. Rights related to data processing and the means of right enforcement and legal remedies available related to processing**

### **10.1. Rights related to processing**

The Data Subject may request from the Controller the following:

- information on the processing of personal data concerning him or her (before the commencement of processing and during processing),
- access to the personal data concerning him or her (the provision of his or her personal data by the Controller),
- the rectification or completion of his or her personal data,
- the erasure of his or her personal data and the restriction of processing (blocking) with the exception of mandatory processing,
- the Data Subject has the right to data portability,
- the Data Subject may object to the processing of his or her personal data.

#### **10.1.1. Right to request information (based on Articles 13-14 of the General Data Protection Regulation)**

The Data Subject may request the following information in writing from the Controller through the contact details indicated in Section 10.2:

- the processed personal data,
- the legal basis for processing,
- the purpose of processing,
- the source of data,
- the period of processing,
- whether a processor is engaged, and if so, the name, address and processing activity of such processor,
- to whom the Controller has provided access to the personal data, when, based on which law and to which data, or the person to whom it has transferred the personal data,
- the circumstances and effects of any personal data breach and the measures taken to eliminate such data breach.

The Controller shall fulfil the Data Subject's request within one month at the latest by sending a letter to the contact details provided.

#### **10.1.2. Right of access (based on Article 15 of the General Data Protection Regulation)**

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 processed.

The Controller shall provide a copy of the personal data undergoing processing to the Data Subject if it does not breach any other legal provisions. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided in a commonly used electronic form.

#### **10.1.3. Right to rectification and completion (based on Article 16 of the General Data Protection Regulation)**

The Data Subject may request the Controller in writing through the contact details indicated in Section 10.2 to modify any of the personal data concerning him or her (e.g. he or she may change his or her email address, phone number or postal address at any time, or may request from the Controller the rectification of the inaccurate personal data concerning him or her and processed by the Controller).

Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete personal data concerning him or her and processed by the Controller completed.

The Controller shall fulfil the request within one month at the latest and notifies the Data Subject thereof in a letter sent to the contact details provided.

#### **10.1.4. Right to erasure (based on Article 17 of the General Data Protection Regulation)**

The Data Subject may request the Controller in writing through the contact details indicated in Section 10.2 to erase the personal data concerning him or her.

Controller shall fulfil the request within one month maximum, and Controller shall notify the Data Subject by letter sent to the contact details provided for this purpose.

#### **10.1.5. Right to blocking (restriction of processing) (based on Article 18 of the General Data Protection Regulation)**

The Data Subject may request the Controller in writing through the contact details indicated in Section 10.2 to block the personal data concerning him or her (by clearly indicating the restricted nature of processing and by performing processing separately from any other data).

Blocking shall be maintained until the reason provided by the Data Subject requires the storage of data.

The Data Subject may request the blocking of data for example where he or she deems that his or her data have been unlawfully processed by the Controller; however, for the purposes of the authority or judicial proceedings initiated by him or her the Controller shall not erase such data.

In such a case, the Controller shall continue to store the personal data (e.g. the submission or personal data concerned) until being contacted by the authority or the court; thereafter the data shall be erased.

#### **10.1.6. Right to data portability (based on Article 20 of the General Data Protection Regulation)**

The Data Subject may request in writing through the contact details indicated in Section 10.2 to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format and shall have the right to transmit those data to another controller without hindrance from the Controller, where:

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

#### **10.1.7. Right to object (based on Article 21 of the General Data Protection Regulation)**

The Data Subject shall have the right to object – in writing through the contact details indicated in Section 10.2 – to processing of personal data concerning him or her which is necessary to enforce the legitimate interests of the Controller or a third party and which is based on point (f) of Article 6(1) of the General Data Protection Regulation, 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.

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

### **10.2. Means of right enforcement and legal remedies available related to processing**

#### **Sending a request to the Controllers**

Before initiating judicial or authority proceedings, we recommend you to contact the Controller concerned and send your complaint to it regarding the processing of personal data concerning you to enable us to investigate the case and provide a reassuring solution or to fulfil any of your requests or claims under Section 10.1 if it is reasoned.

In the case of the enforcement of any rights of the Data Subject in relation to processing under Section 10.1, the Data Subject's request for information regarding processing, or his or her objection to or complaint regarding processing, the Controller concerned shall investigate the case without undue delay and within the period specified in current laws, take action in relation to the request and provide information on the case to the Data Subject. That period may be extended as stipulated by law where necessary, taking into account the complexity and number of the requests.

Where the Data Subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject. If the Controller concerned does not take action on the request of the Data Subject, the Controller shall inform the Data Subject without delay and at the latest within the period specified by law of the reasons for not taking action and for refusing to fulfil the request, and on the possibility of initiating judicial or authority proceedings in the case as follows.

**If you wish to enforce your rights relating to processing, you have any questions or doubts regarding your personal data processed by the Controller concerned, you wish to request information on your data or lodge a complaint, or you wish to exercise any of your rights under Section 10.1, you may do so through the concerned Controller's contact details listed in Section 1.**

### **Initiation of judicial proceedings**

The Data Subject may initiate judicial proceedings against the Controller or – in connection with processing operations falling within the scope of the processor's activity – the processor if in his or her opinion the controller or the processor acting on behalf of or on the instruction of the controller processes his or her personal data infringing the requirements relating to the processing of personal data and set out in the law or binding legal act of the European Union.

The decision in the lawsuit shall fall within the competency of the tribunal. The lawsuit may be filed – at the choice of the Data Subject – before the tribunal competent for the Data Subject's place of residence or place of abode.

### **Initiation of authority proceedings**

In order to enforce his or her rights, the Data Subject may request from the National Authority for Data Protection and Freedom of Information (H-1055 Budapest, Falk Miksa u. 9-11., website: <http://naih.hu>; postal address: H-1363 Budapest, Pf.: 9.; phone: +36-1-391-1400; fax: +36-1-391-1410; email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) the initiation of investigation or authority proceedings with reference to the fact that infringement has occurred in relation to the processing of his or her personal data, or there is an imminent risk associated therewith, thus in particular

- if in his or her opinion, the Controller restricts the exercise of his or her rights – as Data Subject – under Section 10.1 or refuses his or her request for the enforcement of such rights (initiation of investigation), and
- if in his or her opinion, during the processing of the personal data concerning him or her, the Controller or the processor acting on behalf of or on the instruction of the Controller violates the requirements relating to the processing of personal data and set out in the law or binding legal act of the European Union (requesting the conduct of authority proceedings).

## **11. Miscellaneous**

During the processing of personal data detailed herein automated decision-making, profiling and the transfer of the personal data to third countries or international organisations are not performed.

This Privacy Notice is available on the <https://www.mvmnext.hu/> website.

The Controller reserves the right to unilaterally modify this Notice with regard to the future. The Controller informs the Data Subjects of such modifications through its website.



12. Description of data processing

	Description and purpose of processing	Controller, persons entitled to access at the Controller	Scope of processed data and their source	Legal basis for processing	Period of processing and storage
1.	<b>Activities in connection with Insurance services</b>	Product Manager of Controller Employees performing processing activities according to point 9 at the Processor	Customer identification, consumption place, connection ID, name, phone number, e-mail address, phonogram, date of birth, place of birth, mother's name, name of chosen insurance package relative's data: name, date of birth, place of birth, mother's name, registration number, type of vehicle, details of the beneficiary: name, date of birth, place of birth, mother's name, their source is primarily the customer database of the Energy Service Provider, or if the customer provides other data in a separate statement, the data provided is the statement.	The Data Subject's consent – point (a) of Article 6(1) of the General Data Protection Regulation	If the Data Subject withdraws his or her consent, the personal data shall be erased without delay, but within 3 (three) days at the latest. Regarding to Accounting Law Insurance Companies shall keep the documents generated in connection with conclusion and registration of the agreement and accounting documents for 8 years.  The Controller shall keep the complaint and the reply to it for 3 years.