



PRIVACY POLICY

(data processing based on voluntary consent)

- 1. Data controller: the data controller** is the legal entity that determines the purposes and means of the processing of personal data independently or jointly with others. Where the purposes and means of processing are jointly determined by two or more controllers, they shall be considered joint controllers. In connection with this policy, the joint data controllers ("**Data Controllers**") are **E.ON Hungaria Co. Ltd.** (registered office: 1134 Budapest, Váci út 17., company registration number: 01-10-043518, e-mail address: adatvedelem@eon-hungaria.com, website address: www.eon.hu); **E.ON E.ON Energy Solutions Kft.** (registered office: 1134 Budapest, Váci út 17., company registration number: 01-09-729313; e-mail address: adatvedelem@eon-hungaria.com, website address: www.eon.hu); and **E.ON MyEnergy Kft.** (registered office: 1134 Budapest, Váci út 17.; company registration number: 01-09-328978, website address: www.eon.com).

This information applies to joint data processing carried out by the Data Controllers based on voluntary consent for the purposes specified in this policy. For the purposes of this policy, personal data is 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. Some of the data processed by the Data Controller in connection with the purposes specified in this prospectus are personal data. The Data Subject may turn to any Data Controller by contacting them. The competent Data Controller may act towards the Data Subject.

- 2. Legal basis for data processing: consent of the Data Subject** pursuant to Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council ("**GDPR**"). Below are the details of data processing according to each data processing purpose. If you consent to the processing of your personal data, the Data Controllers will process it in accordance with the applicable Hungarian and European Union data protection laws. By providing the relevant personal data, you represent that you have become familiar with the version of this notice in force at the time the personal data is provided and have made your consent on this basis.

You have the right to withdraw your consent to data processing at any time, without restriction, free of charge, and after the withdrawal, your personal data will not be used by the Data Controllers for the purposes specified in the consent.

- 3. Data processing purposes: the data processing purposes** specified in this privacy policy are set out in the table at the end of this information. When giving consent, the Data Subject may choose between the individual data processing purposes and give his or her consent for all purposes or only for one of the data processing purposes. In addition to the above, the consent to data processing is valid only for the contact channels provided by the Data Subject in his or her consent.

In case the consent is given for the purpose of presenting the offers of companies belonging to the E.ON Hungária Group, the offers will be sent to the Data Subject by E.ON Hungária Co. Ltd. Accordingly, no data is transferred to companies belonging to the E.ON Hungária Group, other than those identified as Data Controllers in the prospectus. The current list of companies belonging to the E.ON Hungária Group is available on the www.eon.hu/adatvedelem website.

- 4. Duration of storage of personal data: the Data Controllers** process personal data until withdrawal or for 5 years from the date of consent. If the Data Subject withdraws his or her consent before the deadline, the personal data must be deleted as described in this policy, provided that data processed on a legal basis other than consent are not covered by the deletion.
- 5. Data security:** the security of your personal data is important for the number of Data Controllers. In order to protect your personal data, the Data Controllers shall maintain in force an appropriate information security regulation, which describes the ways and conditions for the application of data security principles. Access to the data is restricted by the Data Controller and the Data Processor by specifying permission levels. The employees of the Data Controller and the Data Processor may access the jobs defined by the Data Controller and the Data Processor in a specific way, according to the permission levels. The Data Controller protects the IT systems with a firewall for the security of the IT systems and uses antivirus and anti-virus programs to prevent external and internal data loss. The Data Controller also ensured that incoming and outgoing electronic communications are properly controlled in order to prevent abuse. The Data Controllers shall keep the information security regulations



referred to above in force on the procedure of possible data processing incidents. The Data Controller and the Data Processor classify and treat personal data as confidential data. In our managed information security measures, we pay special attention to, among other things, (i) operational and development security, (ii) data leakage prevention, (iii) business continuity, (iv) protection against malicious code, (v) secure storage, transmission, processing, (vi) intrusion protection and detection, (vii) prevention of unauthorized access, (viii) vulnerability and incident management, and (ix) our employees safety training. We take risk-proportionate measures to protect the Data Subject. We use high-level security measures and safeguards to protect the data of Data Subjects throughout its lifecycle.

6. Data processor: data processor means a natural or legal person who processes personal data on behalf of the Data Controller. The data processors ("**Data Processor**") may have access to data belonging to the data processing purposes indicated in the data protection consent you have accepted. They act as Data Processors in relation to your personal data:

1. **E.ON Digital Technology Hungary Korlátolt Felelősségű Társaság** (registered office: 1134 Budapest, Váci út 17.; CRn.: 01-09-677830 e-mail address: adatvedelem@eon-hungaria.com, website address: www.eon.hu), which it operates the IT systems of the Data Controllers, so all data processing operations specified in this notice are carried out using the tools of data processor A, therefore the data processor A has access to all personal data specified therein;
- **E.ON Gazdasági Szolgáltató Kft.** (registered office: 9027 Győr, Kandó Kálmán u. 11-13., company registration number: 08-09-014052 e-mail address: adatvedelem@eon-hungaria.com, website address: www.eon.hu) qualifies as a Data Processor, which company is It performs data processing tasks related to the operation of the central archives of data controllers, so it has access to all personal data that have been communicated to the company in writing (contracts, written communication);
- **E.ON Ügyfélszolgálati Kft.** (registered office: 1134 Budapest, Váci út 17.; CRn.: 01-09-873382 e-mail address: adatvedelem@eon-hungaria.com, website address: www.eon.hu), which performs customer service tasks for the Data Controllers.
1. **T-Systems Magyarország Zrt.** (registered office: 1097 Budapest, Könyves Kálmán körút 36.; CRn.: 01-10-044852 email address: hivatalos_irat@t-systems.hu), which operates IT systems for data controllers.
1. **Almidone Kft.** (registered office: 1222 Budapest, Sörház utca 10. A. ép. AS 2nd; CRn.: 01-09-286958; e-mail address: 25747597#cegkapu), which performs sales activities for the Data Controllers.
- **VCC Live Hungary Kft.** (registered office: 1112 Budapest, Balatoni út 2/A. 5. em.; CRn.: 01-09-735941 email address: info@virtual-call-center.hu), which provides the Data Controllers with the Internet network for voice use (VoIP) service.
1. **HRM Center Kft.** (registered office: 1041 Budapest, Závodszy Zoltán utca 59.; CRn.: 01-09-866413 email address: info@hrmcenter.hu), which performs sales activities for the Data Controllers.
- **Balla Média Kft.** (registered office: 2161 Csomád, Kossuth Lajos út 103., company registration number: 13-09-193015), which performs the collection of declarations for the Data Controllers.
- **Protocall Sales Tanácsadó Kft.** (registered office: 2724 Újlengyel, Ady E. u. 41., cégjegyzékszám: CRn.: 13-09-159340), mely az Adatkezelők számára nyilatkozat gyűjtési tevékenységet lát el.
1. **BRAVOGROUP HOLDING Kft.** (registered office: 1145 Budapest, Újvilág u. 50-52.; CRn.: 01-09-166320 email address: titkarsag@bravogroup.hu), which performs activities related to the operation of the archives of the Data Controllers.

In addition to the above company, the personal data of the Data Controllers may be transferred by the Data Controllers to other Data Processors on the basis of a contract or by law. The current list of Data Processors can be accessed at the following link: www.eon.hu/adatvedelem.

7. Rights and legal remedies related to data processing: the Data Subject may request the Data Controller to: (i) be informed about the processing of his or her personal data; (ii) rectification of your personal data; (iii) the erasure or blocking of your personal data, with the exception of mandatory processing, (iv) the right to data portability in certain cases; or (v) object to the processing of your personal data. The Data Controller shall inform the Interested in accordance with the applicable legislation and within the period specified therein. The data subject is at the National Authority for Data Protection and Freedom of Information (<http://naih.hu>; 1363 Budapest, Pf. 9th; telephone: +36 (1) 3911400; fax: +36 (1) 3911410; e-mail: ugyfelszolgalat@naih.hu) initiate a dispute on the grounds that there has been or is an imminent threat of a violation of a right in connection with the processing of



personal data. In the event of a violation of the privacy rights of the Data Subject, he or she may turn to court. In case of going to court, the Data Subject may initiate the lawsuit before the court of his or her domicile or residence.

Before initiating a procedure, it is advisable to send the complaint to the Data Controllers. In the event of a request for information from the Data Subject, or in the event of an objection or complaint related to data processing, the Data Controllers shall provide information to the Data Subject without undue delay and within the time prescribed by the respective legislation. If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended as provided for in the legislation. The data controller shall inform the Data Subject of the extension of the deadline by indicating the reasons for the delay from the receipt of the request. If the Data Subject has submitted the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject. If the Data Controller does not take action on the request of the Data Subject, it shall inform the Data Subject without delay and at the latest within the time limit specified by law of the reasons for not taking action and of the possibility of lodging a complaint with the above-mentioned authority and seeking a judicial remedy. The name and contact details of the Data Controllers' contact person responsible for data protection matters (Data Protection Officer) are available on [the www.eon.hu/adatvedelem](http://www.eon.hu/adatvedelem) page (Data Protection Officer, e-mail address: adatvedelem@eon-hungaria.com).

8. **Publication, modifications:** this privacy policy is available on the www.eon.hu/adatvedelem subpage. The Data Controller reserves the right to amend this policy unilaterally with effect for the future. The Data Subjects should be informed of the changes via the Data Controller's website.

Updated: Jan 01, 2023



Name and purpose of data processing	Legal basis for data processing	Scope of processed data	Duration of data processing	Who has access to the data
Market research	Consent of the Data Subject (Article 6 (1) (a) of the GDPR)	(i) name; (ii) residential address or notice address; (iii) email address; (iv) telephone number or mobile phone number; and, if there is also a contractual relationship between the Data Controller and the Data Subject, the Data Controllers process the following data in connection with the contract(s) in connection with the above purpose: (v) the data subject's customer relationships (characteristics of using personal or electronic customer service); (vi) services used; (vii) bill payment history; (viii) electricity consumption data; (ix) natural gas energy consumption data.	For 5 years from the date of consent. If the Data Subject withdraws his or her consent before the deadline, the personal data cannot be used for the stated purpose and, if there is no other basis for data processing rights, they must be deleted.	(i) employees of each Data Controller serving customer needs ; (ii) marketing and communication support employees of E.ON Hungária Zrt.; (iv) E.ON Customer Service Ltd. customer service employee; (v) E.ON Digital Technolgy Hungary Kft., its employees supporting the operation of IT systems; (vi) The employees of E.ON Economic Service Ltd. supporting document management, as well as the employees of the Data Processors specified in the prospectus.
Sweepstakes	Consent of the Data Subject (Article 6 (1) (a) of the GDPR)	(i) name; (ii) residential address or notice address; (iii) email address; (iv) telephone number or mobile phone number; and, if there is also a contractual relationship between the Data Controller and the Data Subject, the Data Controllers process the following data in connection with the contract(s) in connection with the above purpose: (v) the characteristics of the data subject's customer relations (use of personal or electronic customer service); (vi) characteristics of the services used; invoice payment data (invoice payment information, invoice payment history) (vii) electricity consumption data; (viii) natural gas-energy consumption data.	For 5 years from the date of consent. If the Data Subject withdraws his or her consent before the deadline, the personal data cannot be used for the stated purpose and, if there is no other legal ground for data processing, they must be deleted.	(i) employees of each Data Controller serving customer needs; (ii) marketing and communication support employees of E.ON Hungária Zrt.; (iv) E.ON Customer Service Ltd. customer service employee; (v) E.ON Digital Technolgy Hungary Kft., its employees supporting the operation of IT systems; (vi) The employees of E.ON Economic Service Ltd. supporting document management, as well as the employees of the Data Processors specified in the prospectus.
Offer description (Data Explorer offers)	Consent of the Data Subject (Article 6 (1) (a) of the GDPR)	(i) name; (ii) residential address or notice address; (iii) email address; (iv) telephone number or mobile phone number; and, if there is also a contractual relationship between the Data Controller and the Data Subject, the Data Controllers process the following data in connection with the contract(s) in connection with the above purpose: (v) the characteristics of the data subject's customer relations (use of personal or electronic customer service); (vi) characteristics of the services used; invoice payment data (invoice payment information, invoice payment history) (vii) electricity consumption data; (viii) natural gas-energy consumption data.	For 5 years from the date of consent. If the Data Subject withdraws his or her consent before the deadline, the personal data cannot be used for the stated purpose and, if there is no other legal ground for data processing, they must be deleted.	(i) employees of each Data Controller serving customer needs; (ii) marketing and communication support employees of E.ON Hungária Zrt.; (iv) E.ON Customer Service Ltd. customer service employee; (v) E.ON Digital Technolgy Hungary Kft., its employees supporting the operation of IT systems; (vi) The employees of E.ON Economic Service Ltd. supporting document management, as well as the employees of the Data Processors specified in the prospectus.



Description of the offer (Offers from other companies belonging to the E.ON Hungária Group)

Consent of the Data Subject (Article 6 (1) (a) of the GDPR)

(i) name; (ii) residential address or notice address; (iii) email address; (iv) telephone number or mobile phone number;

In case of consent, the offers will be sent by E.ON Hungária Zrt. to the Data Subject. Accordingly, no data is transferred to any Data Controller other than the companies belonging to the E.ON Hungária Group, which are defined in the prospectus as Data Controllers. The current list of companies belonging to the E.ON Hungária Group is available on the.eon.hu/adatvedelem website.

For 5 years from the date of consent.

If the Data Subject withdraws his or her consent before the deadline, the personal data cannot be used for the stated purpose and, if there is no other legal ground for data processing, they must be deleted.

(i) the marketing and communication support employees of E.ON Hungária Zrt.; (ii) E.ON Customer Service Ltd. customer service employee; (iii) E.ON Digital Technology Hungary Kft., its employees supporting the operation of IT systems; (iv) The employees of E.ON Economic Service Ltd. supporting document management, as well as the employees of the Data Processors specified in the prospectus.