

## Privacy notice for the participation in the MOL Freshhh Program

Denomination and purpose of the data processing	Legal basis of the data processing	Scope and source of the processed personal data	Duration of the data processing	Recipient of the data transfer	Data processor and its processing activity
Participation in Freshhh program, keeping contact between MOL Plc. and the program applicants	Consent of the data subject based on Article 6 (1) a) of the GDPR	<p>Name, date of birth, e-mail address, phone number (we process phone number regarding only the members of the TOP 9 teams in order to organize the final), Linked-In ID, Facebook ID, Google Plus ID</p> <p>Linked-In ID, Facebook ID, Google Plus ID are processed only in the case when the applicant manages his/her application via these social accounts</p> <p>Given by the data subject</p>	Until the end of the relevant Freshhh competition	No data transfer takes place.	<p>InterSim Kft., H-2100 Gödöllő, Bem József u. 10/A</p> <p>DoclerNet Hosting Kft., 1101 Budapest, Expo tér 5-7.</p>
Informing the applicants about future carrier opportunities/programs at MOL Group	Consent of the data subject based on Article 6 (1) a) of the GDPR	<p>Name, e-mail address</p> <p>Given by the data subject</p>	1 year or until the withdrawal of the data subject's consent whichever is earlier	No data transfer takes place.	DoclerNet Hosting Kft., 1101 Budapest, Expo tér 5-7.,

<p>Verifying eligibility criteria of the applicants</p>	<p>Legitimate interest of the data controller based on Article 6 (1) f) of the GDPR</p> <p>The legitimate interest of the Data controller is to avoid fraudulent activities and the participation of those not eligible.</p> <p>You can reach the test balancing legitimate interests which demonstrates the legitimate interest of the data controller as an annex of this privacy notice</p>	<p>Student card ID</p> <p>Given by the data subject</p>	<p>The data of the applicants who will not get into the top60 teams will be erased from the database after the online qualification round. Top 60 teams' data will be erased 5 days after the relevant Live Final.</p>	<p>No data transfer takes place.</p>	<p>InterSim Kft., H-2100 Gödöllő, Bem József u. 10/A</p> <p>DoclerNet Hosting Kft., 1101 Budapest, Expo tér 5-7.,</p>
<p>Providing a forum for discussion of the applicants</p>	<p>Consent of the data subject based on Article 6 (1) a) of the GDPR</p> <p>You give your consent to this type of data processing by using the forum</p>	<p>The content of the communication on the forum</p> <p>Given by the data subject</p>	<p>5 days after the relevant Live Final</p>	<p>No data transfer takes place.</p>	<p>InterSim Kft., H-2100 Gödöllő, Bem József u. 10/A</p> <p>DoclerNet Hosting Kft., 1101 Budapest, Expo tér 5-7.,</p>
<p>Making a Frequently Asked Questions compilation</p>	<p>Legitimate interest of the data controller based on Article 6 (1) f) of the GDPR</p>	<p>The content of the communication on the forum</p>	<p>Frequently asked questions are based on the discussion data in the forum but FAQ</p>	<p>No data transfer takes place.</p>	<p>DoclerNet Hosting Kft., 1101 Budapest, Expo tér 5-7.,</p>

	<p>The legitimate interest of the data controller is to improve the program by analyzing anonymized questions from the FAQ forum.</p> <p>You can reach the test balancing legitimate interests which demonstrates the legitimate interest of the data controller as an annex of this privacy notice</p>	<p>Given by the data subject</p>	<p>contain this information in an anonymised form which doesn't qualify as personal data. This information is processed for 1 year from the relevant Live Final and will be used for improving the Program, however it doesn't qualify as personal data.</p>		
<p>Making an internal analysis regarding the distribution of the applications to the competition (e.g. the number of the participants from a given country or university)</p>	<p>Legitimate interest of the data controller based on Article 6 (1) f) of the GDPR</p> <p>The legitimate interest of the Data controller is to improve and promote the program.</p> <p>You can reach the test balancing legitimate interests which demonstrates the legitimate interest of the data controller as an annex of this privacy notice</p>	<p>School name, faculty, date of graduation</p>	<p>All data will be used anonymously, they will appear in the final results only in an aggregated form in which the individuals can't be identified anymore. This aggregated data will be stored for 5 years for historical comparison reasons only.</p>	<p>No data transfer takes place.</p>	<p>DoclerNet Hosting Kft., 1101 Budapest, Expo tér 5-7.,</p>

<p>After the termination of the competition effective settlement of potential disputes and claims resulting from the competition (e.g. in relation with job offers)</p>	<p>Legitimate interest of the data controller based on Article 6 (1) f) of the GDPR</p> <p>The legitimate interest of the Data controller is to settle potential disputes and claims.</p> <p>You can reach the test balancing legitimate interests which demonstrates the legitimate interest of the data controller as an annex of this privacy notice</p>	<p>Name, date of birth, information related to the data subject's performance and conduct during the competition</p>	<p>When the relevant competition finished, Data controller processes the personal data for 5 years from the termination of the relevant competition in order to settle potential disputes and claims arising out of the competition; after this deadline all the data shall be deleted.</p>	<p>In case of a potential legal dispute data controller may engage a law firm for the purpose of legal representation about which mandate data controller shall notify the data subject in writing.</p>	<p>DoclerNet Hosting Kft., 1101 Budapest, Expo tér 5-7.,</p>
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**Name, postal address, telephone number, website (where the privacy notices are available) and e-mail address of the data controller:**

MOL Plc., 1117 Budapest, Október huszonharmadika utca 18., +36 70 373 2225, [www.mol.hu](http://www.mol.hu)

**Contact person of the data controller:**

Attila M. Erős ([dualiskepzes@mol.hu](mailto:dualiskepzes@mol.hu))

**Name and contact data of the data controller's Data Protection Officer: [dpo@mol.hu](mailto:dpo@mol.hu)**

**Persons at the data controller who are authorized to access to the data (by data processing purposes):**

Officers of Capability Development and Strategic HR MOL Group  
Officers of Capability Development MOL

**Name, postal address, telephone number, website (where the privacy notices are available) and e-mail address of the data processors and other data controller recipients:**

1. InterSim Kft., H-2100 Gödöllő, Bem József u. 10/A, +36 30 297 1692, [www.intersim.hu](http://www.intersim.hu), [office@intersim.hu](mailto:office@intersim.hu)
2. DoclerNet Hosting Kft., 1101 Budapest, Expo tér 5-7., +36 1 432 3133, [www.doclernet.hu](http://www.doclernet.hu), [info@doclernet.hu](mailto:info@doclernet.hu)

**Contact persons of the data processors and other data controller recipients:**

1. Bence Nagy ([bence.nagy@intersim.hu](mailto:bence.nagy@intersim.hu))
2. Hajmási Gergely ([hajmasi.gergely@doclernet.hu](mailto:hajmasi.gergely@doclernet.hu))

**Name and contact data of the data processor's Data Protection Officers:**

1. InterSim Kft., Csaba Tamás ([tamas.csaba@intersim.hu](mailto:tamas.csaba@intersim.hu))
2. DoclerNet Hosting Kft., Hajmási Gergely ([dpo@doclernet.hu](mailto:dpo@doclernet.hu))

**Persons at the data processor who are authorized to access to the data:**

1. InterSim Kft., Csaba Tamás and Bence Nagy
2. DoclerNet Hosting Kft. – colleagues who have the authorization to see the data according to their job descriptions. DoclerNet Hosting Kft. provides only a server service, it does not process the data in any other way.

**Processing of sensitive personal data for the purpose specified in this privacy notice: -**

**Description of the processing activity:**

**1. Registration**

When someone wants to participate in Freshhh program each participants have to make a registration through the website which means that an application form must be filled in with personal data first. All data are required in order to keep contact between MOL Plc. and program applicants. MOL Plc. is collecting participants' data only based on the consent given by the data subject and for the above (in the table) detailed purposes. All data are stored on service provider (DoclerNet Hosting Kft.) webserver and data storages. Important to note that participation in the game and Freshhh program is not allowed until a profile is 100% completed.

**2. Messaging**

Data provided by registered individuals will be also used for sending system messages and direct mails (eDM) to participants after the competition to inform them about future job opportunities, programs and events at MOL Group.

### **3. Verifying Eligibility Criteria of the applicants**

Since the program is only for university students Data controller is entitled to verify whether the data provided by applicants are valid with special regard to Student ID number due to prevent and eliminate fraudulent profiles.

### **4. Frequently Asked Questions compilation**

During the online game there will be Q&A section available for participants to raise their questions. All queries we receive via the internal Forum of the site from the registered individuals will be kept for 1 year without names in an anonymised format. This information will be used for the compilation of FAQ for the next year's Freshhh program. MOL Plc. does not engage any data processors for this operation.

### **5. Internal analysis and reporting**

Data processor (Intersim Kft.) provides raw data exports to Data controller who summarizes, separates data into various categories and analyses the data according to actual statistical needs to show about the program. No personal data will be incorporated in these reports and most reports are for internal usage. Those numbers that might be presented in external materials promoting the program will be summarized high level numbers only.

DoclerNet Hosting Kft. provides only a server service, it does not process the data in any other way.

InterSim Kft. ensures the technical realization of the Freshhh competition.

#### **Transfer of personal data to a third country: -**

**The existence of automated decision-making, including profiling, 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: -**

**Data security measures:**

The controller stores your personal data in an encrypted and/or password protected database in order to ensure the secrecy, integrity and availability of your personal data in accordance with the IT security norms and standards. Within the framework of risk-proportionate protection and measuring the classification of personal and business data, the data controller ensures the protection of data on a network, an infrastructural and an application level (with firewalls, antivirus programs, encryption mechanisms for storage and communication; in this case the encrypted data flow is not retrievable without knowing the decryption code due to the asymmetric coding, in addition with content filtering and other technical and process solutions). The data security incidents are constantly monitored.

**Your data protection rights:**

The GDPR contains in detail your data protection rights, your possibilities of seeking a legal remedy and the restrictions thereof (especially sections 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You can request at any time information about your personal data processed, you can request the rectification and erasure of your personal data or the restriction of their processing, furthermore you can object to the data processing based on a legitimate interest and to the sending of direct marketing messages, and you have the right to data portability. We summarize the most important provisions below.

**Right to information:**

If the data controller processes your personal data it must provide you information concerning the data relating to you – even without your special request thereof – including the main characteristics of the data processing just as the purpose, grounds and duration of control, the name and address of the data controller and its representative, the recipients of the personal data (in case of data transfer to third countries indicating also the adequate and appropriate guarantees), the legitimate interests of the data controller and/or third parties in case of a data processing based on a legitimate interest, furthermore your data protection rights and your possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), in the case if you have not had yet all this information. Data controller provides you the abovementioned information by making this privacy notice available to you.

**Right of access:**

You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain information related to the data processing such as the purpose of the data processing, the categories of the personal data processed, the recipients of the personal data, the (scheduled) duration of the data processing, the data subject's data protection rights and possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), furthermore information on the source of the data where they are collected from the data subject. Upon your request the controller shall provide a copy of your personal data undergoing processing. For any further copies requested by you, the controller may charge a reasonable fee based on administrative costs. The right to obtain a copy shall not adversely affect the rights and freedoms of others. The data controller gives you information on the possibility, the procedure, the potential costs and other details of providing the copy after receiving your request.

**Right to rectification:**

You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement

**Right to erasure:**

You have the right to obtain from the controller the erasure of personal data concerning you without undue delay and the controller has the obligation to erase personal data without undue delay where certain grounds or conditions are given. Among other grounds the data controller is obliged to erase your personal data upon your request for example if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; if you withdraw your consent on which the processing is based, and where there is no other legal ground for the processing; if the personal data have been unlawfully processed; or if you object to the processing and there are no overriding legitimate grounds for the processing; if 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; or if the personal data have been collected in relation to the offer of information society services.

If the data processing is based on your consent the consequence of the withdrawal of the consent:

If you withdraw your consent regarding the first data processing purpose (participation and keeping contact), unfortunately we cannot ensure your participation in the Program, so you cannot continue the game.

If you withdraw your consent regarding the second data processing activity (informing you about future carrier opportunities), MOL Plc. will not send you further notification messages in the future.

We inform you that the withdrawal of your consent does not affect the legality of the data processing carried out before the withdrawal, based on your consent.

**Right to restriction of processing:**

You 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 you, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and you oppose the erasure of the personal data and request 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 you for the establishment, exercise or defence of legal claims;
- (d) you have objected to processing, pending the verification whether the legitimate grounds of the controller override your legitimate grounds.

Where processing has been restricted according to the abovementioned reasons, such personal data shall, with the exception of storage, only be processed with your 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.

You shall be informed by the controller before the restriction of processing is lifted.

**Right to object:**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legitimate interests of the data controller. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing purposes, including profiling to the extent that it is related to such direct marketing. Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

**How to exercise your rights:**

The controller shall provide information on action taken on a request based on your abovementioned rights without undue delay and in any event **within one month** of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. If the controller does not take action on your request, the controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the competent data protection supervisory authority (In Hungary the Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information) briefly 'NAIH') and seeking a judicial remedy. Address, telephone number, fax number, e-mail address and website of the NAIH: 1125 Budapest Szilágyi Erzsébet fasor 22/C., Tel: +36 1 391 1400, Fax: +36-1-391-1410, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), [website: http://naih.hu/](http://naih.hu/)

In the event of any infringement of your rights you may file for court action. The action falls within the jurisdiction of the Törvényszék (General Court). Upon the data subject's request the action can be brought before the Court which is competent based on the domicile or the place of residence of the data subject. The court may order the data controller to provide the information, to rectify, block or erase the data in question, to annul the decision adopted by means of automated data-processing systems, to honor the data subject's objection. The court may order publication of its decision, indicating the identification of the data controller or any other data controllers and the committed infringement.

The data controller concerned shall be liable for any damage caused to a data subject as a result of unlawful processing or by any breach of data security requirements. Where any data controller violates the rights of the data subject relating to personality as a result of unlawful processing or by any breach of data security requirements, the data subject shall be entitled to demand restitution from the data controller concerned. Data controller may be exempted from liability for damages or for payment of restitution if he proves that the damage was caused by or the violation of the rights of the data subject relating to personality is attributable to inevitable reasons beyond his control.

No compensation shall be paid and no restitution may be demanded where the damage was caused by or the violation of rights relating to personality is attributable to intentional or negligent conduct on the part of the data subject.