



BAHART

BALATON SHIPPING COMPANY'S PRIVACY NOTICE AND INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR PASSENGERS AND (PUBLIC) PORT USERS OF PASSENGER TRANSPORT AND FERRY SERVICES

Identity and contact details of the data controller:

Name of data controller:	Balatoni Hajózási Zártkörűen működő Részvénytársaság Balaton Shipping Private Limited Company
Short name of the data controller:	Balatoni Hajózási Zrt. Balaton Shipping Co.
Registration number of data controller:	14-10-300113
Seat of the controller:	8600 Siófok, Krúdy sétány 2.
Data controller's e-availability:	www.bahart.hu
Representative of the data controller:	VEIGL, Gábor CEO
Data Protection Officer:	Tóth Rita
E-mail address:	adatvedelem@bahart.hu
Telephone No:	+36 20 2529786

Data processor's identity and contact details:

Under a service contract:	OTP Mobil Szolgáltató Kft.
Seat:	1093 Budapest, Közraktár utca 30-32 River Park K30. épület II.
Company registration number:	Cg. 01-09-174466
Tax identification number:	24386106-2-43
Under a service contract:	Bilingo Technologies Zrt.
Seat:	1133 Budapest, Árbóc u. 6.
Company registration number:	01-10-140802
Tax identification number:	27926309-2-41

Date of entry into force: **01 April 2022**



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1. Purpose of this privacy notice

By creating and making available this information, Balaton Shipping Co. – hereinafter referred to as BAHART – wishes to ensure the realisation of the right to information of the data subject as defined in Article 12 of the GDPR.

The purpose of the information notice is to provide data subjects with adequate information about the data processed by BAHART or by the data processor it has appointed, their source, the purpose, legal basis and duration of the processing, the name and address of any data processor involved in the processing and the data processor's activities related to the processing.

With this information, BAHART intends to ensure the lawful operation of the registers, the constitutional principles of data protection and the requirements of data security, and to prevent unauthorised access to, unauthorised alteration of, and unauthorised disclosure of data.

2. Scope of the privacy notice

The privacy notice is valid from 01 April 2022 until its withdrawal

This privacy notice applies to any passenger using BAHART's travel, passenger transport, or ferry services and port users.

3. Definitions

Applicable Legislation:

- Info Act: Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information
- Ptk.: Act V of 2013 on the Civil Code
- Sztv.: Act C of 2000 on Accounting
- Szvtv: Act CXXXIII of 2005 on the rules of personal and property protection and private investigation
- GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council
- NAIH: National Authority for Data Protection and Freedom of Information
- Consumer protection act.: Act CLV of 1997 on Consumer Protection;

Data Controller:

A natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law.

Data Processing:



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Any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data Processor:

A natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.

Data Processing:

The performance of technical tasks related to processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data.

Data Subject:

Any specific natural person identified or identifiable, directly or indirectly, on the basis of personal data.

Consent of the Data Subject:

A freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her.

Objection:

A statement by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data.

Personal Data:

Any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, 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 the natural person.

Complaint:

Complaints are any negative comments, complaints, notifications, and claims for reimbursement and compensation made orally or in writing by the passenger concerning the service.

Online Ticket:

A ticket, which can be purchased through the BAHART online ticketing system www.jegy.bahart.hu, is a document in electronic format entitling the holder to use BAHART passenger and ferry services.

Ticket Buyer:

A person who purchases a ticket for a service offered by BAHART, pre-selected by him/her, at any ticket office operated by BAHART, from a ticket vendor under contract with BAHART, or by using the online ticketing system www.jegy.bahart.hu, by accepting the necessary declarations and successfully paying the service fee electronically.



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Passenger:

Any person having a legal relationship with BAHART and having contracted for any passenger transport - scheduled, pleasure, scheduled programme, or ferry.



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Registered user:

A user who creates a user account on the www.iegvy.bahart.hu online ticketing system for the purpose of purchasing tickets online by providing his/her personal data for the purpose of purchasing tickets online, in order to make it quicker and easier to do so more than once.

Guest ticket buyer:

A user who, for the purpose of purchasing tickets online, enters the personal data required to purchase tickets in the online ticketing system www.iegvy.bahart.hu without creating a user account.

Port users:

All natural and legal persons entering the port area owned by BAHART, as well as the owners, passengers, operators, skippers and other authorised representatives of vehicles and floating facilities entering or leaving the port area.

4. Rules of Data Processing

It is prohibited to use personal data processed by BAHART for private purposes. The data processing must always comply with the purpose limitation principle. BAHART shall process personal data only for specified purposes, for the exercise of a right and the performance of an obligation, to the minimum extent and for the minimum time necessary to achieve the purpose.

BAHART processes personal data only with the prior consent of the data subject or on the basis of a law or statutory authorisation. In the case of special personal data, a prior written consent is necessary.

BAHART declares that it only processes personal data in accordance with the provisions of the legislation in force, and therefore only processes personal data on the legal bases set out in Article 6 of the GDPR.

5. Types of passenger-related data processing

5.1. Data processing related to ticket purchases

BAHART offers its passengers the possibility to purchase their tickets online via the online ticketing system www.iegvy.bahart.hu through OTP Mobil Szolgáltató Kft. SimplePay payment system and the account service provider Billingo.

5.1.1. Data processing for registered users when purchasing tickets online:

The purpose of data processing is to ensure the technical conditions of ticket purchase, to issue a receipt in accordance with the Sztv., to send the ticket and the invoice to the passenger, and, if the passenger voluntarily consents, to send special offers and promotions to the passenger.

Scope of stored data:

- Full name of the user
- User's address or, in the case of a legal person, registered office



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- User's e-mail address
- Title of the service:
 - private person
 - business company, legal person
- If you use the service as a company or legal entity: tax number

Time limit for data storage:

- Until the registration, user account is deleted or modified
- At the request of the data subject, on the working day following the notification of the request
- The data on the invoices issued are kept for 8 years after the invoice is issued, or as required by the Sztv in force from time to time.

5.1.2. Data processing for guest ticket purchasers when purchasing tickets online:

The purpose of data processing is to ensure the technical conditions of ticket purchase, to issue a receipt in accordance with the Civil Code, to send the ticket and the invoice to the passenger.

Scope of stored data:

- Full name of the user
- User's address or, in the case of a legal person, registered office
- User's e-mail address
- Title of the service:
 - private person
 - business company, legal person
- If you use the service as a company or legal entity: tax number

Time limit for data storage:

- Until the registration, user account is deleted or modified
- The data on the invoices issued are kept for 8 years after the invoice is issued, or as required by the Sztv in force from time to time.

5.1.3. Processing of data related to the purchase of tickets at the port ticket office:

In the case of tickets purchased on the spot at the port cash desk, the Customer's personal details are required only in the case of invoicing. The purpose of the data processing is to issue an invoice in accordance with the Sztv.

Scope of stored data:

- Full name of the user
- User's address or, in the case of a legal person, registered office
- If you use the service as a company or legal entity: tax number

Time limit for data storage:

- The data on the invoices issued are kept for 8 years after the invoice is issued, or as required by the Sztv in force from time to time.



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5.1.4. Data processing in relation to complaint handling

The purpose of data processing is to deal with passenger complaints, comments, investigations, refund s and damages.

BAHART operates a customer service for the handling, investigation and administration of complaints and comments, and the BAHART Customer Service Centre receives inquiries at the following e-mail address: ugyfelszolgalat@bahart.hu, at the telephone number +36 84 310050 and at the following postal address: 8600 Siófok, Pf. 22.

Scope of stored data:

- Passenger's full name
- Passenger's address or, in the case of a legal person, registered office
- Title of the service:
 - private person
 - business company, legal person
- If you use the service as a company or legal entity: tax number
- The passenger's telephone number and e-mail address for contact purposes
- Where, when and how to lodge a complaint
- Detailed description of the complaint
- Documents to support the complaint (e.g. ticket, copy of invoice, copy of proof of entitlement to a discount, etc.)
- Name and signature of the person recording the complaint and taking minutes thereof, if possible, the signature of the data subject

If the complaint is not in writing, BAHART will record the complaint received, which will include the data listed.

Time limit for data storage:

- The data on the invoices issued are kept for 8 years after the invoice is issued, or as required by the Sztv in force from time to time
- Pursuant to Section 17/A (7) of the Consumer Protection Act, 3 years from the date of notification.

5.1.5. Passenger and property security related data processing

BAHART shall operate electronic surveillance systems at its headquarters, other facilities and on its waterborne means of transport, subject to the legal basis and provisions set out in Article 31 of the Act.. The cameras that are part of the systems are owned by BAHART, and BAHART ensures the safe storage of the recordings. The surveillance system is capable of recording images.

Method and deadline for deleting recordings made with the electronic surveillance system:

If the recordings are not used, they will be deleted after 8, i.e. eight working days from the date of recording [Section 31 (2) of the Act on the Protection of Personal Data (Sztv.)]. Use is when the recording is used as evidence in judicial or other official proceedings.

In all cases, BAHART ensures the rights of the data subject as set out in the Act on the Protection of Data Subjects, i.e. the person whose right or legitimate interest is affected by



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the recording may request, within the above-mentioned deletion period (eight working days), that the data not be destroyed or deleted by the data controller by providing evidence of his/her right or legitimate interest (e.g. accident report, damage report, copy of a denunciation, etc.), but he/she may not view the recording even then.

The Company's Data Protection Officer will decide on the request as soon as possible. The recordings so marked shall be extracted and handed over to the Security Officer, who shall ensure that they are properly stored, and shall inform the Data Protection Officer. At the request of a court or other authority, the recorded recording must be sent to the court or authority without delay, must be handed over. If the recording is not requested by a public authority or a court, i.e. if it is not used within thirty days of the request not to destroy it, the recording will be deleted.

The purpose of data processing is to protect the security of the object (e.g. cashier, ship, ferry, port) and the property of BAHART, as well as the physical safety and property of persons (e.g. passengers, port users) in the monitored area.

Scope of stored data:

- a picture of the person concerned,
- data that can be obtained from the camera image (location, time of stay)

Legal basis of data processing:

- the data subject's consent by his or her own free will [Sztvtv. § 30 (2)]

Time limit for data storage:

- the recording will be deleted after 8, i.e. eight working days from the date of recording if it has not been used [Section 31 (2) of the Act on the Protection of Personal Data (Sztvtv.)]
- if the recording has been requested by justification of a right or legitimate interest that the Company should not destroy it, but the requisition is not made, it will be deleted after 30, i.e. thirty days from the request [Section 31 (6) of the Act on the Protection of the Right to Information in the Public Sector]

5.2. Camera footage from event and programme boats

Purpose of data processing:

BAHART reserves the right to use camera footage on its event and programme vessels for marketing and promotional purposes only. By purchasing a ticket for the programme and event boat and boarding the boat, the ticket purchaser contributes to this. If you have not purchased the ticket for your own use, you are obliged to inform the person entitled to travel of this, and BAHART shall not be liable for any failure to give information and any inconvenience caused.

Scope of data stored:

- a photo of the person concerned,
- data that can be obtained from the camera image (location, time of stay)

Legal basis for data processing:

- the data subject's consent by his or her own free will (purchase of tickets)

Time limit for data storage:



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- BAHART may use the recordings for marketing and promotional purposes for an unlimited period of time, but always endeavours to ensure that the recordings used do not focus on a specific person, but are suitable for advertising and propagating the event, and to show their atmosphere, character and not the participants

6. Enforcement of Data Subject's Rights

6.1. Right to request information

Data Subject may request information from the Controller, rectification of their personal data and restriction of data processing.

Upon request, the Data Controller shall provide information about the data it processes, the purpose, legal basis and duration of the processing, the name and address (registered office) of the data controller, the name and address of (registered office) of the data processors and their activities in relation to the processing, the contact details of the Data Protection Officer, the persons who receive or have received your personal data and the purpose of which they receive or have received your personal data, and your rights in relation to the processing. The Data Controller shall provide the information in writing in an intelligible form within the shortest possible period of time from the submission of the request, but not later than 1 month. If necessary, taking into account the complexity of the application and the number of requests, this deadline may be extended by a further two months. If the request for information is unfounded, in particular because of its repetitive nature, or excessive, the Data Controller may refuse to act on the request.

6.2. Right to access

You have the right to receive feedback from the Data Controller on whether your personal data are being processed..

On the basis of the right of access, you are entitled to have access to personal data relating to ongoing processing and to the following information:

- purpose of data processing,
- the categories of personal data concerned,
- the duration of the processing,
- who receives or has received the subject's personal data and for what purposes,

At the request of the Data Subject, the Data Controller shall provide a copy of the personal data subject to the processing, provided that it does not adversely affect the rights and freedom of others.

6.3. Modification (correction) and deletion of data

Registered users of the BAHART www.jegy.bahart.hu online ticketing system have the possibility to modify and delete their data, their account, and to withdraw their consent to the processing of data, which they have given for the purpose of sending information about special offers or other marketing purposes.

All Data Subjects, the Data Controller may request the modification (rectification) of inaccurate personal data concerning him/her, or the completion of incomplete personal data, or withdraw his/her consent to the processing of personal data for marketing purposes, at the following contact details: ugyfelszolgalat@bahart.hu, adatvedelem@bahart.hu, or at the postal address of the Data Controller, Pf. 22, 8600 Siófok.



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All Data Subjects may request the erasure of their personal data via the Controller's contact details at ugyfelszolgalat@bahart.hu and adatvedelem@bahart.hu, as well as via the postal address of the Data Controller at Pf. 22, 8600 Siófok, if the purpose of the processing has ceased, if the Data Subject withdraws his or her consent, if the processing of the data is unlawful, if the specified period for storing the data has expired, or if a court or public authority has ordered the erasure of the data.

If the Data Subject submits a request for erasure of the data within the period during which the Controller is obliged to process the personal data, the Controller shall refuse to comply with the erasure request pursuant to Article 17(3)(b) of the GDPR. Where the processing of personal data is necessary for the establishment, exercise or defence of legal claims, a request for erasure shall be refused pursuant to Article 17 (3)(e) of the GDPR..

The Data Controller shall notify the Data Subject about the evaluation of the request and the measures taken as a result thereof, as well as all those to whom it may have previously transferred the data for the purposes of data processing.

The Data Controller shall not delete personal data if it is necessary for the fulfilment of a legal obligation to which the Data Controller is subject or for the establishment, exercise or defence of legal claims.

6.4. Restrictions on the processing of data

The data subject may request the restriction of the processing of his or her personal data by the controller at the following contact details ugyfelszolgalat@bahart.hu, adatvedelem@bahart.hu and 8600 Siófok Pf. 22, in case of:

- Disputing the accuracy of the personal data (in this case, the restriction applies for as long as the Data Controller verifies the accuracy of the data);
- The processing is unlawful, but the Data Subject opposes the erasure of the data and requests the restriction of their use;
- The purpose of the processing has ceased, but the Data Subject needs the data for the establishment, exercise or defence of legal claims.

The restriction will last as long as necessary for the reason indicated by the Data Subject. In this case, BAHART will process the personal data (except for storage) only with the consent of the Data Subject; or for the establishment, exercise or defence of legal claims; or to protect the rights of another natural or legal person; or for important public interests. The Data Controller shall inform the Data Subject in advance of the lifting of the restriction at the Data Subject's request.

6.5. How to enforce the data subject's rights:

The Data Subject may submit the following requests to the Data Controller, in writing, addressed to the Data Protection Officer of BAHART at the contact details provided on page 1 of this notice:

- they may request information about the processing of their personal data,
- they may request the rectification of their personal data,
- they may withdraw their consent to the processing,
- they may request the deletion of their personal data if, in their opinion, the processing is unlawful or no longer necessary for the purposes for which it was collected,
- they may request the restriction of the processing of their personal data,
- they may exercise their right to data portability.



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Within one month of receipt of the request, the DPO will inform the Data Subject of the outcome of the request and of the action taken. This deadline may be extended by a maximum of two additional months if justified by the complexity of the request or the number of requests currently being processed, but the Data Subject must be informed electronically within one month of receipt of the request.

6.6. Legal remedies

The data subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information in the event of a breach of his or her rights or if he or she disagrees with the decision of the Data Controller.

Name:	National Authority for Data Protection and Freedom of Information
Headquarters:	1055 Budapest, Falk Miksa u. 9-11.
Mailing address:	1363 Budapest, Pf. 9.
Telephone:	(+36-1) 391-1400
Telefax:	(+36-1) 391-1410
E-mail:	ugyfelszolgalat@naih.hu

In the event of a breach of the Data Subject's rights, or if the Data Subject disagrees with the decision of the Controller, the Data Subject may, within 30 days of its notification, directly seek legal remedy against the Controller before the courts of the place where the Controller has its registered office or the place of residence or domicile. The court or tribunal shall decide on the case out of turn.

If you require further information in addition to the information contained in this Privacy Notice or if you have any comments or objections regarding the processing of your data, you can contact the BAHART Data Protection Officer for further information using the contact details provided on page 1 of this notice.

Siófok, 01. April 2022

BALATON SHIPPING COMPANY