

Privacy Notice

relating to the data processing activities of MOL Magyar Olaj- és Gázipari Nyilvánosan Működő Részvénytársaság and the relevant MOL Group Company concerning their contractual partners that register via the Partner Portal website (<https://b2bpartnerportal.com/pp/login>) (hereinafter referred to as the „Portal”) and via the applications available and used through the Portal (hereinafter referred to as „Partner(s)”), legal entities and other organisations requesting proposals, as well as users of the Portal and their contracted contact persons, representatives and employees

Description and purpose of data processing	Legal basis of data processing	Scope and source of the processed personal data	Recipient of data transfers
<p>I PARTNER PORTAL</p> <p>Operating the Partner Portal and processing user data related to the Portal</p> <p>This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees.</p> <p>Registration system: Partner Portal</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR¹ (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.</p>	<p>Family and given name, user name, e-mail address, telephone number and preferred language of the contact person as specified during or after the registration of a particular Partner.</p> <p>Source of data: the relevant Partner</p>	<p>MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE.</p>
<p>II E-Business</p> <p>Data processing related to receiving requests for proposal and proposals, sending proposals and contracting</p> <p>This data processing operation includes the processing of the contact details of the contact persons, representatives and employees of legal entities or other organisations requesting contract proposals from the Company via the Portal.</p> <p>Registration system: E-Business</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the legal entity or other organisation requesting the quote).</p> <p>Legitimate interest: handling requests for proposal, formulating proposals, keeping contacts for commercial purposes, as well as successfully and effectively negotiating contracts.</p>	<p>Name, position, e-mail address, telephone number of the contact person, representative or competent employee of the relevant entity that is requesting a proposal; (company) name, registered office of the represented organisation; as well as content of the request for proposal and of the proposal.</p> <p>Source of data: the legal entity or other organisation that is requesting a proposal; the person acting on behalf of that entity or other organisation; OPTEN public company database.</p>	<p>MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE.</p>
<p>Fulfillment of fuel wholesale contracts and Group Gold EU/HU fuel card contracts concluded with Partners, including keeping contacts and sending notifications as provided for in the contract, following up on the generated turnover and</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the</p>	<p>Name, position, e-mail address, telephone number of the contact person, representative or competent employee concerned; (company) name, registered office, company registration number, bank account</p>	<p>MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes</p>

¹ 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).

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<p>fulfilling the undertaken commitments, furthermore, in the case of proposals addressed to Customers, taking steps at the request of the data subjects prior to entering into a contract.</p> <p>Registration system: E-Business, SAP, CRM</p>	<p>Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the legal entity or other organisation requesting the quote).</p> <p>Legitimate interest: keeping contacts for commercial purposes, performing the contract, following up on the generated turnover and on fulfilment of the commitments undertaken.</p>	<p>number, taxpayer ID number of the represented Partner; any additional data related to the performance of the contract, the products purchased and any related services used; other fuel card related data for fuel card contracts.</p> <p>Source of data: Partner Portal, E-Business.</p>	<p>place. The list of Companies using the Partner Portal are listed HERE.</p>
<p>III WebISA, MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: enabling Partners to use the application/service and to benefit from it, strengthening the partnerships of the Company.</p>	<p>Name, position, e-mail address, telephone number of the contact person, representative or competent employee concerned; (company) name, registered office, company registration number, bank account number, taxpayer ID number of the represented Partner; as well as data related to orders, shipments and invoices.</p> <p>Source of data: Web ISA mobile application, SAP.</p>	<p>MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE.</p>
<p>III.1 MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p> <p>Data processing related to the evaluations and feedback given by Partners through MyISA</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p>	<p>Name, position, e-mail address, telephone number of the contact person, representative or competent employee concerned; (company) name, registered office, content of evaluations and feedback given by Partners.</p> <p>Source of data: the relevant Partner.</p>	<p>MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE.</p>

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Registration system: corporate mailing system, dedicated e-mail address.	Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.		
Data processing related to the provision of information by the Company (contact details for daily contact – changes in the opening hours of a site, service during public holidays, etc.)	<p>Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: providing information about the Company's services and products</p> <p>Legitimate interest: providing up-to-date information to Partners in order to ensure smooth service.</p>	<p>Name, e-mail address, telephone number of the contact person, representative or competent employee concerned; (company) name, registered office, and any other contact details of the represented Partner (e.g. central e-mail address, postal address of the site); any other data that may be affected by the provision of information.</p> <p>Source of data: the relevant Partner.</p>	MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE .
<p>IV OCC (Card Centre)</p> <p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p> <p>The "Terms and conditions on the use of the Card Center" contains additional provisions on the data management related to the Card Center and on the rights and legal remedies of the parties, which is shared by the Company before using the service.</p>	<p>For natural persons Article 6(1)(a) of GDPR (the freely given consent of the data subject).</p> <p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the relevant e-mail address (see in Annex 2 at the relevant country).</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p> <p>For persons registering on behalf of a legal entity, other company Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest of the Company and the contracted Partner: Providing the services of Card Centre, management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>Dedicated login name of the user, user authorization and notification on creation/modification/cancellation of access.</p> <p>The registered user is solely responsible for keeping and securing their password. Passwords are not handled by the Company, however, in case of the Customer's request (e.g. forgotten password) the Company provides the possibility of generating a new password.</p> <p>Other data managed by the Company: customer code, (company) name, address, telephone number, fax number, e-mail address, signature, legal entity, other organization In the case of customers, also the name and position of the representative, card-related reports.</p> <p>Name, e-mail address and telephone number of the data subject as well as any data and reports related to his or her card.</p> <p>Source of data: the relevant contact person. FCBC, Arksys, SAP.</p>	MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE .
V. Claims	In the case of Customer complaints: CLV of 1997 on consumer protection. Act ("Fgytv.") 17 / A. § (2) - (6), the	Name, telephone number and e-mail address of the data subject, data included in the claim, card number	MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other

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<p>Online interface for handling notifications and complaints related to the fulfillment of contracts for Card Center (OCC) and ISA authorized partners.</p> <p>Handling and responding to consumer complaints and handling product related and service complaints.</p> <p>Quality Claims and service related claims shall be governed by the provisions of a separate protocol.</p>	<p>Company is obliged to investigate the complaint of the persons considered to be consumers, and if the Customer does not agree with the handling of the complaint or immediate investigation is not possible, the Company shall immediately take a report of the complaint and its position. and provide a copy to the customer, depending on the nature of the complaint.</p> <p>In case of a warranty claim for supplies, product warranty, mandatory and voluntary warranty: Decree No. 19/2014 (IV. 29.) NGM on the procedural rules for handling warranty and guarantee claims for goods sold under contract between a customer and a business ("19/2014. Gov. r."), The Company is obliged to draw up a report on the warranty or guarantee claim. In this context, the Customer declares that he or she consents to the processing of his or her personal data (Article 6 (1) (a) GDPR).</p> <p>In the absence of the report, the Company is not able to handle the supply warranty, product warranty, mandatory and voluntary warranty claim</p>	<p>in case of a fuel card related claim, data on the vehicle for card identification, data required for the payment in case of possible compensation (bank account number).</p> <p>The data of the (Customer) complaint is recorded in the CRM system, which includes the place, time and method of submitting the complaint, a detailed description of the Customer's complaint, a list of documents presented by the Customer, a statement of the Company's position on the Customer's complaint, if it is possible to investigate the complaint immediately, the signature of the person who prepared the report and - with the exception of an oral complaint received via telephone or other electronic communication service - the Customer, the place and time of recording the report.</p> <p>Pursuant to Section 4 (1) of Government Decree 19/2014, the minutes drawn up in connection with the warranty claim, product warranty, mandatory and voluntary warranty claim should contain the Customer's name, address and a statement that he or she consents to the data recorded in the report to be processed according to the Government Decree 19/2014; the name of the goods sold within the framework of the contract between the Customer and the Company, the purchase price, the fulfillment date of the contract by the Company, the date of the recording the claim with its description, the Customer's claim based on warranty or guarantee - except in the case where the Company is unable to declare the fulfillment of the consumer's warranty or guarantee claim at the time of its notification - the way of settling the warranty or guarantee claim or the cause of refusing the claim as well as any additional information recorded in the related report.</p>	<p>data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE.</p>
<p>VI Planning tool and Partner Collaboration Portal</p> <p>Data handling and monitoring of requested and received offers with related settlement documentation. Data handling covers the contact data of the requestor legal entities' and other firms' contact person.</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Partner is party or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a customer (Partner), Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Controllers).</p>	<p>Name, position, e-mail address, telephone number of the contact person, representative or competent employee concerned in the name of the Partner.</p> <p>Source of data: Partner Portal, OPTEN database</p>	<p>MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE.</p>

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	<p>Necessary for contract fulfilment: harmonization of economic activity of the parties, exercising contractual rights, performing the obligations.</p> <p>Legitimate interest: handling and receiving offers, contact for business purpose, handling settlements.</p>		
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct", as well as INA Group Code of Ethics.</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are available at the following link: https://molgroup.info/en/sustainability/ethics-and-governance</p> <p>. INA Group Code of Ethics is available at the following link: https://www.ina.hr/wp-content/uploads/2020/01/ina-group-code-of-ethics-web-1.pdf.</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>All personal data specified under the above data processing purposes.</p>	<p>- In cases where the relevant Company initiates an ethics inquiry, members of that Company's Ethics Committee will have access to the data required to conduct the proceedings.</p> <p>- Where the Company launches any other proceedings in order to prevent, detect and investigate fraud and abuses, the staff of the Regional Security, Group Security and Internal Audit functions may have access to the data required for the investigation.</p> <p>Where the investigation concerns another company of the MOL Group and, based on the investigation, that specific company exercises legal claims, the HR and legal functions of that specific company, as well as the HR and legal functions of the Company will have access to the data.</p> <p>In cases where MOL Group Company transfers the data to MOL Nyrt., they are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE.</p>
<p>VIII Exercise of legal claims</p> <p>For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.</p>	<p>All personal data specified under the above data processing purposes.</p>	<p>The staff of the MOL Plc.'s Regional Security, Group Security, Internal Audit and Legal functions may have access to the data required for the investigation.</p> <p>MOL Nyrt. and the relevant MOL Group Company are joint controllers. No other data transfer for a data controller takes place. The list of Companies using the Partner Portal are listed HERE.</p>

The Privacy Notice is available at the registration interface of the Partner Portal ([link](#)).

The retention periods and the list of data processors are listed [HERE](#).

In addition to the above, under Article 6(1)(f) of GDPR (based on the legitimate interest), MOL Plc. and relevant MOL Group Company use the services of its lawyer partners to manage and successfully exercise its claims vis-à-vis its contractual partners, and transfers the required personal data to such lawyers for this purpose (including, in particular: the details of its contractual partners and of their contact persons and representatives as specified in the contract, details of the claims). Such lawyers act as independent controllers in accordance with the provisions of their own privacy notices. At the request of the data subject, the relevant Company shall provide information on the lawyer partner involved in a particular data processing operation, as well as the contact details and activities of that lawyer and the data processed in connection therewith.

The above-specified controller partners act as independent controllers in accordance with the provisions of their own privacy notices.

Name, registered office, telephone number, website (where the privacy notices are available) and e-mail address of the processors used by MOL Nyrt.:

MOL IT & Digital GBS Kft. – operating the SAP and CRM systems, ISA and MyISA applications and providing related information technology services (registered office: HU-1117 Budapest, Budafoki út 79, e-mail: ITU@mol.hu)

Danubius Expert Zrt.: Providing IT support in connection with the E-Business system (registered office: HU-2600 Vác, Zichy H. utca 12 e-mail: info@danubiusinfo.hu telephone number: +36-20-343-3554)

Alerant Informatikai Zártkörűen Működő Részvénytársaság: system maintenance and updates related to Partner Portal, short company name: Alerant Zrt. (registered office: HU-1117 Budapest, Infopark sétány 1, e-mail: info@alerant.hu, telephone number: +36 1 205 0055)

T-Systems Magyarország Zrt.: operating and developing card systems (OCC) (registered office: HU-1097 Budapest, Könyves Kálmán krt. 36) e-mail: info@t-systems.hu telephone number: 1400) k

In addition to the above, under Article 6(1)(f) of GDPR (based on the legitimate interest), the relevant Company uses the services of its credit management partners to manage its claims vis-à-vis its contractual partners, as well as the services of its freight forwarder partners to have shipments delivered to the recipients in accordance with the corresponding contracts, and transfers the required personal data to such entities for the above purposes (including, in particular: the details of its contractual partners and of their contact persons and representatives as specified in the contract, details of the claims). Such entities act as processors in accordance with the instructions of the relevant Company. At the request of the data subject, the relevant Company shall provide information on the partner involved in a particular data processing operation, as well as the contact details and activities of that partner and the data processed in connection therewith.

Contact person(s) of the processors used by MOL Nyrt.:

- MOL IT & Digital GBS Kft. – e-mail address: ITU@mol.hu
- Danubius Expert Zrt. – e-mail address: info@danubiusinfo.hu
- Alerant Zrt. – e-mail address: info@alerant.hu
- T-Systems Magyarország Zrt. - e-mail address: info@t-systems.hu

Processors' personnel authorised to access the data:

- MOL IT & Digital GBS Kft. – competent staff involved in the operation of the SAP and CRM systems, ISA and MyISA applications and in the provision of related information technology services.
- Danubius Expert Zrt.: competent staff involved in the provision of IT support in connection with the E-Business system.
- Alerant Zrt.: competent staff involved in the provision of IT support and development in connection with the Partner Portal.
- T-Systems Magyarország Zrt.: competent staff involved in the provision of IT support in connection with the OCC system.

Processing of special categories of personal data (“sensitive data”) for the purposes specified in this Privacy Notice: No sensitive data are processed.

Transfer of personal data to a third country: None

Data security measures:

MOL Group designs and implements data processing operations so that they ensure the protection of the privacy of data subjects during the application of GDPR and of other legislation on data processing.

MOL Group shall ensure the security of data, take the necessary technical and organisational measures and establish the procedural rules necessary to enforce compliance with GDPR and other data protection and secrecy rules.

Personal data are protected by MOL Group against any unauthorised access, alteration, transfer, disclosure, deletion or destruction, accidental destruction or loss, as well as any unavailability due to a change in the technology used. In this context, MOL Group stores the data subjects' personal data in a password protected and/or an encrypted database. In the context of risk-proportionate protection, MOL Group protects personal data using firewalls, antivirus software, encryption mechanisms, content filtering and other technical and process solutions. Data security incidents are constantly monitored.

Your data protection rights:

The GDPR sets out in detail your data protection rights and the available legal remedies, as well as the restrictions thereof (in particular Articles 5, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You can request information at any time about personal data processed concerning you, you can request the rectification or erasure of your personal data or the restriction of the processing, furthermore you can object to data processing based on a legitimate interest. The most important provisions are summarised below.

We draw attention in particular to the following:

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 controller, including profiling based on those provisions. In this case, the relevant Company shall no longer process the personal data unless the relevant Company 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 shall have the right to object at any time to processing of personal data concerning you for such direct marketing purposes.

Where you object to the processing of your personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Right to information:

Where MOL Group processes personal data concerning you, it must provide you with information concerning the data relating to you – even without your special request to that effect – including the main characteristics of the data processing, such as the purpose, legal basis and duration of the processing, the name and contact details of the relevant Company and its representative, contact details of the DPO, the recipients of the personal data, the legitimate interest of the relevant Company and/or third parties in case of data processing based on a legitimate interest, furthermore, your data protection rights and available legal remedies (including the right of lodging a complaint with the supervisory authority), where this information is not yet available to you. The relevant Company provides you with the above-mentioned information by making this Privacy Notice available to you.

Right of access:

You have the right to obtain 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.

At your request, we shall provide you with a copy of your personal data undergoing processing. For any further copies requested by you, we may charge a reasonable fee based on administrative costs. If you submitted your request by electronic means, the information should be provided in a commonly used electronic format, unless otherwise requested by you. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Right to rectification:

You have the right to obtain 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 the erasure of personal data concerning you without undue delay and we shall have the obligation to erase personal data without undue delay where certain grounds apply or certain conditions are met. Among other grounds, we are obliged to erase your personal data at your request if, for example, 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 Company is subject.

The above shall not be applicable, where the processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject;
- (c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (d) for the establishment, exercise or defence of legal claims.

Where the processing is based on your consent, consequence of the withdrawal of your consent:

In the absence of such consent, the OCC (Card Centre) service cannot be provided.

Please note that the withdrawal of your consent shall be without prejudice to any data processing carried out based on your consent prior to the date of such withdrawal.

Right to restriction of processing:

You have the right to obtain restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by you, for a period enabling us 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) we no longer need 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 override your legitimate grounds.

Where the processing has been restricted for any of the above-mentioned 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 before the restriction of processing requested by you 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 controller, including profiling based on those provisions. In this case, we shall no longer process the personal data unless we demonstrate 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 shall have the right to object at any time to processing of personal data concerning you for such direct marketing purposes.

Where you object to the processing of your personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

How to exercise your rights:

The Company 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 Company shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you make the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by you.

If the Company does not take action on your request, the Company 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 and seeking a judicial remedy.

Local authorities:

Country	Authority	Address	Telephone number	Fax number	E-mail address	Website
Austria	Österreichische Datenschutzbehörde (DSB)	Barichgasse 40-42, 1030 Vienna	+43 1 521 52-25 69		dsb@dsb.gv.at	www.dsb.gv.at
Bosnia and Herzegovina	Personal Data Protection Agency in Bosnia and Herzegovina, Contact information of Agency:	Dubrovačka br. 6., 71000 Sarajevo Bosnia and Herzegovina	+387 33 726 250	+387 33 726 251	azlpinfo@azlp.ba	www.azlp.ba
Croatia	Agencija za zaštitu osobnih podataka (AZOP)	Selska cesta 136, HR - 10 000 Zagreb	+385 (0)1 4609-000	+ 385 (0)1 4609-099	azop@azop.hr	www.azop.hr
Czech Republic	Úřad pro ochranu osobních údajů (UOOU)	Pplk. Sochora 27, 170 00 Praha 7	+420 234 665 111	+420 234 665 444	posta@uou.cz	https://www.uou.cz/
Hungary	Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)	1125 Budapest Szilágyi Erzsébet fasor 22/C	+36 1 391 1400	+36-1-391-1410	ugyfelszolgalat@naih.hu	www.naih.hu
Romania	Autoritatea Națională de Supraveghere a	B-dul G-ral. Gheorghe	+40.318.059.211	+40.318.059.602	Anspdcpc@dataprotection.ro	https://www.dataprotection.ro/

	Prelucrării Datelor cu Caracter Personal (ANSPDCP)	Magheru 28- 30 Sector 1, cod postal 010336 Bucuresti, Romania	+40.318.059.212		dpo@dataprotection.ro	
Serbia	Poverenik za informacije od javnog značaja i zaštitu podataka o ličnosti	Bulevar kralja Aleksandra 15, Beograd 11120	+38111 3408 900	+38111 3343 379	office@poverenik.rs	https://www.poverenik.rs/sr-yu/
Slovenia	Informacijski pooblaščenec - Information Commissioner of the Republic of Slovenia	Dunajska cesta 22 1000 Ljubljana, Slovenija	+386 1 230 97 30	+386 1 230 97 78	gp.ip@ip-rs.si	https://www.ip-rs.si
Slovakia	Úrad na ochranu osobných údajov Slovenskej republiky	Hraničná 12, 820 07 Bratislava 27	+421 /2/ 3231 3214		statny.dozor@pdp.gov.sk	www.dataprotection.gov.sk

The information shall be provided by the Company in writing, or by other means, including, where appropriate, by electronic means. When requested by you, the information may be provided orally, provided that your identity is proven by other means.

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR. You can read about how to contact supervisory authorities within the EU here: https://edpb.europa.eu/about-edpb/board/members_hu. You shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning you. You shall further have the right to an effective judicial remedy where the competent supervisory authority does not handle your complaint or does not inform you within three months on the progress or outcome of the complaint lodged. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, you shall have the right to an effective judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR.

Proceedings against the Company or its data controller or processor partner shall be brought before the courts of the Member State where the Company, the controller or the processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

Such litigation falls within the jurisdiction of the following courts:

Country	Information
Austria	Regional court for Civil Law (Landesgericht für Zivilrechtssachen) where the controller or processor has an establishment, alternatively, such proceedings may be brought before the Regional court for Civil Law where the data subject its habitual residence (Art 79/2 GDPR)
Bosnia and Herzegovina	Court of Bosnia and Herzegovina has jurisdiction.
Croatia	The general court has jurisdiction. Such proceedings may be brought before the courts competent at the place where the Company or its controller or processor partner in Croatia has its established (registered) seat.
Czech Republic	The general court has jurisdiction. Information on the jurisdiction and contact details of the courts in Czech republic can be found on the following website: www.justice.cz .
Hungary	Tribunal (in Hungarian: 'törvényszék'). Information on the jurisdiction and contact details of the courts in Hungary can be found on the following website: www.birosag.hu .
Romania	General courts according to Romanian Procedural Civil Code
Serbia	The general courts have jurisdiction. Such proceedings may be brought before the courts competent at the place where the Company or its controller or processor partner has its registered seat. For additional information on the jurisdiction and contact details of the courts, visit: https://portal.sud.rs
Slovakia	The general court has jurisdiction. Information on the jurisdiction and contact details of the courts in Slovak Republic can be found on the following website: www.justice.gov.sk .
Slovenia	The general court has jurisdiction. Such proceedings may be brought before the courts competent at the place where the Company or its controller or processor partner in Slovenia has its registered seat. Information on the jurisdiction and contact details of the courts in Slovenia can be found on the following website: http://www.sodisce.si/sodisca/sodni_sistem/

If the court upholds the claim, it shall establish the fact of infringement and order the Company to terminate the unlawful data processing operation, to restore the lawfulness of the data processing and to take the action exactly defined for the assertion of the relevant data subject's interest and, if necessary, to award damages and damages. demand.

The court may order the publication of its judgment by publishing the identification data of the Company if the judgment affects a wide range of persons or if the gravity of the offense occurred justifies its disclosure.

ANNEX I – LIST OF MOL GROUP COMPANIES USING PARTNER PORTAL/DATA CONTROLLERS

MOL Group Company	Registered office	Telephone number	Website	E-mail address	Contact person	DPO contact (if available)/ Data protection responsible
Energopetrol d.d.	ul. Azize Šaćirbegović br 4-b 71000 Sarajevo Bosnia and Herzegovina	+387 (0) 33 723 900	www.energopetrol.ba			Selma.Sahinasic@energopetrol.ba
INA-Industrija nafte, d.d	Avenija Većeslava Holjevca 10, p.p. 555, 10 020 Zagreb	+385 (01) 6450 523	www.ina.hr	ina-besplatni.telefon@ina.hr	veleprodaja@ina.hr	szop@ina.hr
Tifon d.o.o.	Zadarska ulica 80, 10000 Zagreb		www.tifon.hr/hr/			GDPR@tifon.hr
MOL Česká republika, s.r.o.	Budova Quadrio, 5. patro Purkyňova 2121/3 110 00 Praha 1	+420 241 080 800	www.molcesko.cz	info@molcesko.cz		
MOL Nyrt.	HU-1117 Budapest, Október huszonharmadika utca 18	+36-1-886-5000	www.mol.hu	kereskedelem@mol.hu	kereskedelem@mol.hu	dpo@mol.hu
MOL Petrolkémia Zrt.	H-3581 Tiszaújváros, TVK- Ipartelep, TVK Központi Irodaház, 2119/3. hrsz., 136. épület		www.mol.hu	ERTPolymerCustomerService@mol.hu	ERTPolymerCustomerService@mol.hu	dpo@mol.hu
MOL România Petroleum Products SRL	21 Decembrie 1989, nr. 77, etaj 1, camera C.1.1, 400604, Cluj Napoca, România	+40-264-407600	www.molromania.ro	receptie.cluj@molromania.ro	cardline@molromania.ro	datepersonale@molromania.ro
MOL Austria Handels GmbH	Walcherstrasse 11a, 7. Stock, A-1020 Wien	(+43) 1 21120 1100	www.molaustria.at	office@molaustria.at	verkauf@molaustria.at	office@molaustria.at
MOL Slovenija d.o.o.	Lendavska ulica 24 9000 Murska Sobota	+386 (0)2 530 33 10		molslovenija@mol.si	kartica@mol.si	
MOL Serbia	Đorđa Stanojevića 14 11070 Novi Beograd, Serbia	+381 11 2096 900	www.molserbia.rs	customer.care@molserbia.rs	customer.care@molserbia.rs	
PETROLSZOLG Karbantartó és Szolgáltató Kft.	H-2440 Százhalombatta, Olajmunkás út 2., Hungary	+36 23 551 217	www.petrolszolg.hu	petrolszolg@petrolszolg.hu		

SLOVNAFT, a. s.	Vlčie hrdlo 1, 824 12 Bratislava, Slovak Republic	+421 800 111 811	www.slovnaft.sk	kontaktne.centrum@slovnaft.sk	kontaktne.centrum@slovnaft.sk	zodpovednaosobagdpr@slovnaft.sk
SLOVNAFT MONTÁŽE A OPRAVY a.s.	Vlčie hrdlo, P.O.BOX 52, 82003 Bratislava 23, Slovakia	+421 2 4055 8724		mao@mao.slovnaft.sk	mao@mao.slovnaft.sk	zodpovednaosobasnmao@mao.slovnaft.sk

ANNEX II – RETENTION PERIODS AND DATA PROCESSORS IN THE COUNTRIES

AUSTRIA

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>I PARTNER PORTAL</p> <p>Operating the Partner Portal and processing user data related to the Portal</p> <p>This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees.</p> <p>Registration system: Partner Portal</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.</p> <p>Furthermore, in accordance with Section 13/A, Subsection (3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Activities and Information Society Service, the Company may, for the purpose of providing the service concerned, process the personal data that are absolutely essential from the technical point of view for the provision of the service (required fields: family and given name, user name, e-mail address, telephone number; optional fields: preferred language, contracting MOL Group company).</p>	<p>Personal data will only be kept for as long as reasonably considered necessary to achieve the purposes mentioned under scope and as permitted by applicable law. In any event, the company will store personal data for as long as statutory retention obligations exist or limitation periods for potential legal claims (in particular 7-year retention period pursuant to § 212 UGB for contact inquiries) have not yet expired.</p> <p>The company will store data for longer than this period if and as long as we need it to enforce or defend against specific legal claims.</p>	<p>MOL IT & Digital GBS Magyarország Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>III WebISA, MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: enabling Partners to use the application/service and to benefit from it, strengthening the partnerships of the Company.</p>	<p>Personal data will only be kept for as long as reasonably considered necessary to achieve the purposes mentioned under scope and as permitted by applicable law. In any event, the company will store personal data for as long as statutory retention obligations exist or limitation periods for potential legal claims (in particular 7-year retention period pursuant to § 212 UGB for contact inquiries) have not yet expired.</p> <p>The company will store data for longer than this period if and as long as we need it to enforce or defend against specific legal claims.</p>	<p>MOL IT & Digital GBS Magyarország Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct".</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are available at the following link: https://mol.hu/hu/molrol/etika-es-megfeleles/etika/.</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation.</p> <p>Where action is taken based on the investigation, including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure, any data relating to the report may be processed in the employer's reporting system at the latest until the definitive conclusion of the proceedings initiated based on a specific report.</p>	<p>MOL IT & Digital GBS Magyarország Kft. – operating the SAP and CRM systems and providing information technology services.</p> <p>(registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu).</p>
<p>VIII Exercise of legal claims</p> <p>For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.</p>	<p>Personal data will only be kept for as long as reasonably considered necessary to achieve the purposes mentioned under scope and as permitted by applicable law. In any event, the company will store personal data for as long as statutory retention obligations exist or limitation periods for potential legal claims (in particular 7-year retention period pursuant to § 212 UGB for contact inquiries) have not yet expired. The Company will store data for longer than this period if and as long as we need it to enforce or defend against specific legal claims</p>	<p>MOL IT & Digital GBS Magyarország Kft. – operating the SAP and CRM systems and providing information technology services (registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu).</p>



BOSNIA AND HERZEGOVINA

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>I PARTNER PORTAL</p> <p>Operating the Partner Portal and processing user data related to the Portal</p> <p>This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees.</p> <p>Registration system: Partner Portal</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract) (In B&H: Law on Protection of Personal Data („Official Gazette of Bosnia and Herzegovina" 49/06, 76/11, 89/11)).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.</p> <p>Furthermore, in accordance with Section 13/A, Subsection (3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Activities and Information Society Service, the</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after the date of cancellation of a particular user account (In B&H: Law on the Obligations (Official Gazette of the SFR Yugoslavia, nr. 29/78; 39/85, 45/89, and 57/89; 2/92, 13/93, 13/94, 29/03, 42/11) (Article 371.),, given that the limitation period for civil claims is 5 years.</p> <p>If registration on the Partner Portal is not followed by registration in one of the subsystems within 90 days, the data will be deleted on the 91st day.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
	Company may, for the purpose of providing the service concerned, process the personal data that are absolutely essential from the technical point of view for the provision of the service (required fields: family and given name, user name, e-mail address, telephone number; optional fields: preferred language, contracting MOL Group company).		
<p>IV OCC (Card Centre)</p> <p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p>	<p>Article 6(1)(a) of GDPR (the freely given consent of the data subject).</p> <p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the kartyagyartas@mol.hu e-mail address.</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>Data will be processed by the Company for 5 years after termination of the card contract concluded with the data subject given that the limitation period for civil claims is 5 years.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>T-Systems Magyarország Zrt. (1097 Budapest, Könyves Kálmán krt. 36) – operation and development of card systems</p>
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct".</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are available at the following link: https://molgroup.info/en/sustainability/ethics-and-governance</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation.</p> <p>Where action is taken based on the investigation, including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure, any data relating to the report may be processed in the employer's reporting system at the latest until the definitive conclusion of the proceedings initiated based on a specific report.</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services.</p> <p>(registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu).</p>
<p>VIII Exercise of legal claims</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated</p>	<p>The Company will retain documents related to contractual relationships for a period of 5 years after the termination of a particular to exercise any civil law claims of the</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure	by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.	Company and to defend itself against any civil law claims lodged by data subjects. If the processing of any personal data is necessary for defence or the pursuit of the Company's legitimate interest in court proceedings or in an administrative or out-of-court procedure initiated by a data subject, based on its own legitimate interest, the Company is entitled to process the data (under Article 6(1)(f) of GDPR) until the definitive conclusion of such proceedings or achievement of the legitimate interest by other means (e.g. conclusion of an out-of-court settlement), and, where it is not possible to retain the complete written or electronic document containing the data, the Company is entitled to make an excerpt of the given document having regard to the scope of the necessary data.	(registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu).



CROATIA

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>I PARTNER PORTAL</p> <p>Operating the Partner Portal and processing user data related to the Portal</p> <p>This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees.</p> <p>Registration system: Partner Portal</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after the date of cancellation of a particular user account (statutory limitation period set by Civil Obligations Act).</p> <p>If registration on the Partner Portal is not followed by registration in one of the subsystems within 90 days, the data will be deleted on the 91st day.</p>	<p>MOL IT & Digital GBS Magyarország Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates.</p> <p>Plavi tim, Ulica grada Vukovara 18, 10000 Zagreb - Providing IT and hosting services closely related to the processing.</p>
<p>III WebISA, MyISA</p> <p><i>Relevant company: INA d.d.</i></p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: statutory limitation period set by law (Civil Obligations Act), starting from the termination of the legal relationship with a particular Partner,</p> <p>With respect to tax, accounting or other legal duties of the Company, the data shall be kept for the statutorily mandated period set by the relevant law (Accounting Act, Tax Act and other relevant regulations).</p>	<p>MOL IT & Digital GBS Magyarország Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates.</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>Registration system: Web ISA and MyISA mobile applications</p>	<p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: enabling Partners to use the application/service and to benefit from it, strengthening the partnerships of the Company.</p>		<p>Plavi tim, Ulica grada Vukovara 18, 10000 Zagreb - Providing IT and hosting services closely related to the processing.</p>
<p>III.1 MyISA <i>Relevant company: INA d.d.</i></p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p> <p>Data processing related to the evaluations and feedback given by Partners through MyISA</p> <p>Registration system: corporate mailing system, dedicated e-mail address.</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: statutory limitation period set by law (Civil Obligations Act), starting from the termination of the legal relationship with a particular Partner.</p> <p>Personal data related to evaluations given by Partners will be erased 1 year and 1 month after the date of a particular evaluation.</p>	<p>MOL IT & Digital GBS Magyarország Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates.</p> <p>Plavi tim, Ulica grada Vukovara 18, 10000 Zagreb - Providing IT and hosting services closely related to the processing</p>
<p>Data processing related to the provision of information by the Company (contact details for daily contact – changes in the opening hours of a site, service during public holidays, etc.)</p>	<p>Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: providing information about the Company's services and products</p> <p>Legitimate interest: providing up-to-date information to Partners in order to ensure smooth service.</p>	<p>Until termination of the contractual relationship with the given Partner.</p>	<p>MOL IT & Digital GBS Magyarország Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates.</p> <p>Plavi tim, Ulica grada Vukovara 18, 10000 Zagreb - Providing IT and hosting services closely related to the processing</p>
<p>IV Card Centre (OCC) <i>Relevant company: Tifon d.d.</i></p>	<p>For natural persons Article 6(1)(a) of GDPR (the freely given consent of the data subject).</p>	<p>Data will be processed by the Company for 5 years after termination of the card contract concluded with the data subject (pursuant to Section 6:22(1) of the Civil Code), given that the limitation period for civil claims is 5 years.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p> <p>Additional provisions on the data processing related to the Card Center and on the rights and legal remedies of the parties can be found in the The "Conditions and information on the use of the Card Center", which the Company always shares with the parties before using the service.</p>	<p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the relevant e-mail address (see in Annex 2 at the relevant country).</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p> <p>For persons registering on behalf of a legal entity, other company Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest of the Company and the contracted Partner: Providing the services of Card Centre, management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>		<p>T-Systems Magyarország Zrt. (1097 Budapest, Könyves Kálmán krt. 36) – operation and development of card systems</p>
<p>VI Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate INA Group Code of Ethics.</p> <p>The prevention and investigation of fraud and abuses are governed by the INA Group Code of Ethics, which is available at the following link:</p> <p>https://www.ina.hr/wp-content/uploads/2020/01/ina-group-code-of-ethics-web-1.pdf</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest).</p> <p>Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>1. With regard to Ethics procedure involving employees, any data relating to the Ethics investigation, procedure and/or Ethics report shall be kept during the employment relationship and 5 year time period afterwards, starting from the end of the year in which the employment relationship ended.</p> <p>With regard to Ethics procedure that does not involve employees, any data relating to the Ethics investigation, procedure and/or Ethics report shall be kept for a 5 year time period, starting from the end of the year in which the relevant procedure was final and closed.</p> <p>Notwithstanding the above, Ethics Committee minutes shall be kept for a 5 year time period, starting from the end of the year in which the minute was created.</p> <p>2. Where action is taken based on the investigation, both including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure and an action of the reporting person against the Company because of the initiation of legal proceedings, any</p>	<p>MOL IT & Digital GBS Magyarország Kft. – operating the SAP and CRM systems and providing information technology services.</p> <p>(registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu).</p> <p>Plavi tim, Ulica grada Vukovara 18, 10000 Zagreb - Providing IT and hosting services closely related to the processing (e.g. SAP system). E-mail address: plavitim@plavitim.hr</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
		data relating to the Ethics procedure may be processed until the definitive conclusion of the initiated proceedings.	
VII Exercise of legal claims For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure	Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.	The Company will retain documents related to contractual relationships for a statutory limitation period set by law, starting from the termination of a particular contract to exercise any civil law claims of the Company and to defend itself against any civil law claims lodged by data subjects. If the processing of any personal data is necessary for defence or the pursuit of the Company's legitimate interest in court proceedings or in an administrative or out-of-court procedure initiated by a data subject, based on its own legitimate interest, the Company is entitled to process the data (under Article 6(1)(f) of GDPR) until the definitive conclusion of such proceedings or achievement of the legitimate interest by other means (e.g. conclusion of an out-of-court settlement), and, where it is not possible to retain the complete written or electronic document containing the data, the Company is entitled to make an excerpt of the given document having regard to the scope of the necessary data.	MOL IT & Digital GBS Magyarország Kft. – operating the SAP and CRM systems and providing information technology services (registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu). Plavi tim, Ulica grada Vukovara 18, 10000 Zagreb - Providing IT and hosting services closely related to the processing. E-mail address: plavitim@plavitim.hr



Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
I PARTNER PORTAL Operating the Partner Portal and processing user data related to the Portal This data processing operation includes the processing of the contact details of Partners and of other users of the	For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR ² (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).	With regard to the exercise of claims or fulfilment of obligations: 4 years after termination of the legal relationship with a particular Partner pursuant to § 629 of Civil Code. If registration on the Partner Portal is not followed by registration in one of the subsystems within 90 days, the data will be deleted on the 91 st day.	MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing, any integration and data exchange activities, supporting deployment and development related with data, its processing and data encryption. Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates

² 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).

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>Portal, as well as of the contact information of their contact persons, representatives and employees.</p> <p>Registration system: Partner Portal</p>	<p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.</p>		
<p>III WebISA, MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: enabling Partners to use the application/service and to benefit from it, strengthening the partnerships of the Company.</p>	<p>With regard to the exercise of claims or fulfilment of obligations: 4 years after termination of the legal relationship with a particular Partner pursuant to § 629 of Civil Code.</p> <p>Where the processing is necessary for the fulfilment of tax obligations to which the Company is subject, the data shall be processed for a period of 10 following the year to which the accounting records/invoices pertain).</p> <p>Where the data are also necessary for the fulfilment of accounting obligations to which the Company is subject and for retaining accounting documents, they must be retained for 10 years following the year to which the accounting documents pertain</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Development and deployment activities related with data, its processing and data encryption.</p> <p>Secure communication over a computer network,</p> <p>Development and support of mobile apps, data security related with mobile apps.</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>III.1 MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p> <p>Data processing related to the evaluations and feedback given by Partners through MyISA</p> <p>Registration system: corporate mailing system, dedicated e-mail address.</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>With regard to the exercise of claims or fulfilment of obligations: 4 years after termination of the legal relationship with a particular Partner pursuant to § 629 of Civil Code.</p> <p>Where the processing is necessary for the fulfilment of tax obligations to which the Company is subject, the data shall be processed for a period of 10 following the year to which the accounting records/invoices pertain).</p> <p>Where the data are also necessary for the fulfilment of accounting obligations to which the Company is subject and for retaining accounting documents, they must be retained for 10 years following the year to which the accounting documents pertain</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>System integration and data exchange activities, supporting deployment and development related with data, its processing and data encryption.</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>Data processing related to the provision of information by the Company (contact details for daily contact – changes in the opening hours of a site, service during public holidays, etc.)</p>	<p>Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: providing information about the Company's services and products</p> <p>Legitimate interest: providing up-to-date information to Partners in order to ensure smooth service.</p>	<p>Until termination of the contractual relationship with the given Partner.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>IV OCC (Card Centre)</p> <p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p>	<p>Article 6(1)(a) of GDPR (the freely given consent of the data subject).</p> <p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the kartyagyartas@mol.hu e-mail address.</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>With regard to the exercise of claims or fulfilment of obligations: 4 years after termination of the legal relationship with a particular Partner pursuant to § 629 of Civil Code.</p> <p>Where the processing is necessary for the fulfilment of tax obligations to which the Company is subject, the data shall be processed for a period of 10 following the year to which the accounting records/invoices pertain).</p> <p>Where the data are also necessary for the fulfilment of accounting obligations to which the Company is subject and for retaining accounting documents, they must be retained for 10 years following the year to which the accounting documents pertain</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Deployment and development related with data, its processing and data encryption.</p> <p>T-Systems Magyarország Zrt. (1097 Budapest, Könyves Kálmán krt. 36) – operation and development of card systems</p>
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct".</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation.</p> <p>Where action is taken based on the investigation, including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure, any data relating to the report may be processed in the employer's reporting system at the latest until the definitive</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services.</p> <p>Secure data exchange and data processing (user management, authorisation concept] in and among the systems.</p> <p>(registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu).</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
available at the following link: https://molgroup.info/en/sustainability/ethics-and-governance		conclusion of the proceedings initiated based on a specific report.	
VIII Exercise of legal claims For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure	Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.	Personal data are stored for 10 years as from the valid resolution of given court proceedings, out-of-court recovery. The storage period commences on the first day of the year following the year in which the court proceedings were validly resolved/out-of-court recovery closed.	MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services (registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu).



Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
I PARTNER PORTAL Operating the Partner Portal and processing user data related to the Portal This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees. Registration system: Partner Portal	For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract). For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner). Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal. Furthermore, in accordance with Section 13/A, Subsection (3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Activities and Information Society Service, the Company may, for the purpose of providing the service concerned, process the personal data that are absolutely essential from the technical point of view for the provision of the service (required fields: family and given name, user name, e-mail address, telephone number; optional fields: preferred language, contracting MOL Group company).	With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after the date of cancellation of a particular user account (pursuant to Section 6:22(1) of Act V of 2013 on the Civil Code, hereinafter referred to as the "Civil Code"), given that the limitation period for civil claims is 5 years. If registration on the Partner Portal is not followed by registration in one of the subsystems within 90 days, the data will be deleted on the 91 st day.	MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates
II E-Business Data processing related to receiving requests for proposal and proposals, sending proposals and contracting This data processing operation includes the processing of the contact details of the contact persons, representatives	For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract). For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests	With regard to the exercise of civil claims or fulfilment of obligations under civil law: if a contract is concluded between the Company and an entity that requested a proposal, 5 years to be calculated from the termination of the contractual relationship; in all other cases, 5 years to be calculated from the receipt of the contract proposal by the recipient, or from the explicit rejection of the proposal or, in the absence of a	MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>and employees of legal entities or other organisations requesting contract proposals from the Company via the Portal.</p> <p>Registration system: E-Business</p>	<p>pursued by the legal entity or other organisation requesting the quote).</p> <p>Legitimate interest: handling requests for proposal, formulating proposals, keeping contacts for commercial purposes, as well as successfully and effectively negotiating contracts.</p>	<p>proposal, 5 years from the date of the last communication between the parties (pursuant to Section 6:22(1) of the Civil Code), given that the limitation period for civil claims is 5 years.</p>	<p>Danubius Expert Zrt. (2600 Vác, Zichy H. utca 12.) – system maintenance and updates</p>
<p>Fulfilment of fuel wholesale contracts and Group Gold EU/HU fuel card contracts concluded with Partners, including keeping contacts and sending notifications as provided for in the contract, following up on the generated turnover and fulfilling the undertaken commitments, furthermore, in the case of proposals addressed to Customers, taking steps at the request of the data subjects prior to entering into a contract.</p> <p>Registration system: E-Business, SAP, CRM</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the legal entity or other organisation requesting the quote).</p> <p>Legitimate interest: keeping contacts for commercial purposes, performing the contract, following up on the generated turnover and on fulfilment of the commitments undertaken.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after termination of the legal relationship with a particular Partner (pursuant to Section 6:22(1) of the Civil Code), given that the limitation period for civil claims is 5 years.</p> <p>Where the processing is necessary for the fulfilment of tax obligations to which the Company is subject, the data shall be processed for a period of 5 years after the last day of the calendar year in which the relevant tax return was supposed to be filed, or the relevant data was supposed to be reported or declared, or, in the absence of such tax return/report/declaration, the year in which the tax was due (Sections 78(3) and 202(1) of the Taxation Act).</p> <p>Where the data are also necessary for the fulfilment of accounting obligations to which the Company is subject and/or for retaining accounting documents, they must be retained for 8 years (Sections 168-169 of Act C of 2000 on Accounting, hereinafter referred to as the "Accounting Act").</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p> <p>Danubius Expert Zrt. (2600 Vác, Zichy H. utca 12.) – system maintenance and updates</p>
<p>III WebISA, MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements (information on overdue invoices, dunning letter, view e-invoices)</p> <p>Registration system: Web ISA and MyISA mobile applications</p>	<p>For persons, sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: enabling Partners to use the application/service and to benefit from it, strengthening the partnerships of the Company.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after termination of the legal relationship with a particular Partner (pursuant to Section 6:22(1) of the Civil Code), given that the limitation period for civil claims is 5 years.</p> <p>Where the processing is necessary for the fulfilment of tax obligations to which the Company is subject, the data shall be processed for a period of 5 years after the last day of the calendar year in which the relevant tax return was supposed to be filed, or the relevant data was supposed to be reported or declared, or, in the absence of such tax return/report/declaration, the year in which the tax was due (Sections 78(3) and 202(1) of the Taxation Act).</p> <p>Where the data are also necessary for the fulfilment of accounting obligations to which the Company is subject and for retaining accounting documents, they must be retained for 8 years (Sections 168-169 of the Accounting Act).</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>III.1 MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p> <p>Data processing related to the evaluations and feedback given by Partners through MyISA</p> <p>Registration system: corporate mailing system, dedicated e-mail address.</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after termination of the legal relationship with a particular Partner (pursuant to Section 6:22(1) of the Civil Code), given that the limitation period for civil claims is 5 years.</p> <p>Personal data related to evaluations given by Partners will be erased 1 year and 1 month after the date of a particular evaluation.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>Data processing related to the provision of information by the Company (contact details for daily contact – changes in the opening hours of a site, service during public holidays, etc.)</p>	<p>Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: providing information about the Company's services and products</p> <p>Legitimate interest: providing up-to-date information to Partners in order to ensure smooth service.</p>	<p>Until termination of the contractual relationship with the given Partner.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>IV Card Centre (OCC)</p> <p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p> <p>Additional provisions on the data processing related to the Card Center and on the rights and legal remedies of the parties can be found in the The "Conditions and information on the use of the Card Center", which the Company always shares with the parties before using the service.</p>	<p>For natural persons Article 6(1)(a) of GDPR (the freely given consent of the data subject).</p> <p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the relevant e-mail address (see in Annex 2 at the relevant country).</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p>	<p>Data will be processed by the Company for 5 years after termination of the card contract concluded with the data subject (pursuant to Section 6:22(1) of the Civil Code), given that the limitation period for civil claims is 5 years.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>T-Systems Magyarország Zrt. (1097 Budapest, Könyves Kálmán krt. 36) – operation and development of card systems</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
	<p>For persons registering on behalf of a legal entity, other company Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest of the Company and the contracted Partner: Providing the services of Card Centre, management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>		
<p>V. Claims</p> <p>Online interface for handling notifications and complaints related to the fulfillment of contracts for Card Center (OCC) and ISA authorized partners.</p> <p>Handling and responding to consumer complaints and handling product related and service complaints.</p> <p>Quality Claims and service related claims shall be governed by the provisions of a separate protocol.</p>	<p>In the case of Customer complaints: CLV of 1997 on consumer protection. Act ("Fgytv.") 17 / A. § (2) - (6), the Company is obliged to investigate the complaint of the persons considered to be consumers, and if the Customer does not agree with the handling of the complaint or immediate investigation is not possible, the Company shall immediately take a report of the complaint and its position. and provide a copy to the customer, depending on the nature of the complaint.</p> <p>In case of a warranty claim for supplies, product warranty, mandatory and voluntary warranty: Decree No. 19/2014 (IV. 29.) NGM on the procedural rules for handling warranty and guarantee claims for goods sold under contract between a customer and a business, The Company is obliged to draw up a report on the warranty or guarantee claim. In this context, the Customer declares that he or she consents to the processing of his or her personal data (Article 6 (1) (a) GDPR).</p> <p>In the absence of the report, the Company is not able to handle the supply warranty, product warranty, mandatory and voluntary warranty claim</p>	<p>The Company is obliged to keep the record of the complaint and a copy of the Company's response to the complaint for 5 years and to present it upon the request of the audit authority (Section 17 / A (7) of the Fgytv.).</p> <p>Pursuant to Section 4 (6) of Government Decree 19/2014, the Company is obliged to keep the report on the supply warranty, product warranty, mandatory and voluntary warranty claim for 3 years from the date of its collection and to present it upon the request of the audit authority.</p> <p>In addition, the Company processed the data related to the enforcement of the warranty until the end of the warranty period, the data related to the enforcement of the product warranty for 2 years from the launch of the product [Ptk. 6: 169th § (2)], handles the data related to the enforcement of the supply warranty until the enforcement of the supply warranty.</p> <p>Reporting a warranty or guarantee claim does not qualify as a claim according to Fgytv. Thus, if the relevant warranty claim, product warranty, mandatory and voluntary warranty claim are enforced, and the Customer would like to file a complaint in accordance with the Fgytv., this must be done separately at the Company.</p>	<p>MOL IT & Digital GBS Kft. (1117 Budapest, Budafoki út 79.) - providing IT and hosting services closely related to the processing, e-mail address: itu@mol.hu).</p> <p>Danubius Expert Zrt. (2600 Vác, Zichy H. utca 12.) – system maintenance and upgrades</p>
<p>VI Planning tool and Partner Collaboration Portal</p> <p>Data handling and monitoring of requested and received offers with related settlement documentation. Data handling covers the contact data of the requestor legal entities' and other firms' contact person.</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Partner is party or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a customer (Partner), Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Controllers).</p>	<p>With regard to the exercise of claims or fulfilment of obligations: 5 years after termination of the legal relationship with a particular Partner</p>	<p>MOL Magyarország Informatikai Szolgáltató Kft. (1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (1117 Budapest, Infopark sétány 1.) – system maintenance and updates</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
	<p>Necessary for contract fulfilment: harmonization of economic activity of the parties, exercising contractual rights, performing the obligations.</p> <p>Legitimate interest: handling and receiving offers, contact for business purpose, handling settlements.</p>		<p>Petrolszolg Karbantartó és Szolgáltató Kft. (2440 Százhalombatta, Olajmunkás út 2.) – received offers and settlement handling system</p>
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct".</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are available at the following link: https://mol.hu/hu/molrol/etika-es-megfeleles/etika/.</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation.</p> <p>Where action is taken based on the investigation, including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure, any data relating to the report may be processed in the employer's reporting system at the latest until the definitive conclusion of the proceedings initiated based on a specific report.</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services.</p> <p>(registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu).</p>
<p>VIII Exercise of legal claims</p> <p>For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.</p>	<p>The Company will retain documents related to contractual relationships for a period of 5 years after the termination of a particular contract (under Section 6:22 (1) of the Civil Code) to exercise any civil law claims of the Company and to defend itself against any civil law claims lodged by data subjects.</p> <p>If the processing of any personal data is necessary for defence or the pursuit of the Company's legitimate interest in court proceedings or in an administrative or out-of-court procedure</p> <p>initiated by a data subject, based on its own legitimate interest, the Company is entitled to process the data (under Article 6(1)(f) of GDPR) until the definitive conclusion of such proceedings or achievement of the legitimate interest by other means (e.g. conclusion of an out-of-court settlement), and, where it is not possible to retain the complete written or electronic document containing the data, the Company is entitled to make an excerpt of the given document having regard to the scope of the necessary data.</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services (registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu).</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>I. PARTNER PORTAL</p> <p>Operating the Partner Portal and processing user data related to the Portal</p> <p>This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees.</p> <p>Registration system: Partner Portal</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 3 years after the date of cancellation of a particular user account (pursuant to Article 2517 of the Civil Code, hereinafter referred to as the "Civil Code"), given that the limitation period for civil claims is 5 years.</p> <p>If registration on the Partner Portal is not followed by registration in one of the subsystems within 90 days, the data will be deleted on the 91st day.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>II. WebISA, MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: enabling Partners to use the application/service and to benefit from it, strengthening the partnerships of the Company.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 3 years after termination of the legal relationship with a particular Partner (pursuant to Article 2517 of the Civil Code), given that the limitation period for civil claims is 3 years.</p> <p>Where the processing is necessary for the fulfilment of tax obligations to which the Company is subject, the data shall be processed for a period of 5 years after 1st of July of the following calendar year for which the taxes are due (art.110 (1), (2) Law 207/2015 – Fiscal procedure code). The right of the tax authority to establish tax claims expires within 10 years if the tax payment obligation result from the commission of an act provided by criminal law (art.110 (3) Law 207/2015 – Fiscal procedure code).</p> <p>Where the data are also necessary for the fulfilment of accounting obligations to which the Company is subject and for retaining accounting documents, they must be retained 5 years reckoned from the last day of the financial period closed, except the documents reflecting assets with useful life longer than 5 years – in this latter case the documents shall be archived for the useful life of the assets, payroll registers (50 years) and mandatory accounting registers (10 years reckoned from the last day of the financial period closed) (OMFP 2634/ 2015)</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>

<p>III. 1MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p> <p>Data processing related to the evaluations and feedback given by Partners through MyISA</p> <p>Registration system: corporate mailing system, dedicated e-mail address.</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 3 years after termination of the legal relationship with a particular Partner (pursuant to article 2517 of the Civil Code), given that the limitation period for civil claims is 3 years.</p> <p>Personal data related to evaluations given by Partners will be erased 1 year and 1 month after the date of a particular evaluation.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>Data processing related to the provision of information by the Company (contact details for daily contact – changes in the opening hours of a site, service during public holidays, etc.)</p>	<p>Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: providing information about the Company's services and products</p> <p>Legitimate interest: providing up-to-date information to Partners in order to ensure smooth service.</p>	<p>Until termination of the contractual relationship with the given Partner.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>IV. OCC (Card Centre)</p> <p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p>	<p>Article 6(1)(a) of GDPR (the freely given consent of the data subject).</p> <p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the datepersonale@molromania.ro e-mail address.</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p>	<p>Data will be processed by the Company for 3 years after termination of the card contract concluded with the data subject (pursuant to Article 2517 of the Civil Code), given that the limitation period for civil claims is 5 years.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>T-Systems Magyarország Zrt. (1097 Budapest, Könyves Kálmán krt. 36) – operation and development of card systems</p>

	<p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>		
<p>V. Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct".</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are available at the following link: https://molgroup.info/en/sustainability/ethics-and-governance</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation.</p> <p>Where action is taken based on the investigation, including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure, any data relating to the report may be processed in the employer's reporting system at the latest until the definitive conclusion of the proceedings initiated based on a specific report.</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP systems and providing information technology services. (registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu).</p>
<p>VI. Exercise of legal claims</p> <p>For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.</p>	<p>The Company will retain documents related to contractual relationships for a period of 3 years after the termination of a particular contract (under Article 2517 of the Civil Code) to exercise any civil law claims of the Company and to defend itself against any civil law claims lodged by data subjects.</p> <p>If the processing of any personal data is necessary for defence or the pursuit of the Company's legitimate interest in court proceedings or in an administrative or out-of-court procedure</p> <p>initiated by a data subject, based on its own legitimate interest, the Company is entitled to process the data (under Article 6(1)(f) of GDPR) until the definitive conclusion of such proceedings or achievement of the legitimate interest by other means (e.g. conclusion of an out-of-court settlement), and, where it is not possible to retain the complete written or electronic document containing the data, the Company is entitled to make an excerpt of the given document having regard to the scope of the necessary data.</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services (registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu).</p>



SERBIA

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>I PARTNER PORTAL</p> <p>Operating the Partner Portal and processing user data related to the Portal</p> <p>This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees.</p> <p>Registration system: Partner Portal</p>	<p>Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after the date of cancellation of a particular user account given that the limitation period for civil claims is 5 years.</p> <p>If registration on the Partner Portal is not followed by registration in one of the subsystems within 90 days, the data will be deleted on the 91st day.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>IV Card Centre (OCC)</p> <p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p> <p>Additional provisions on the data processing related to the Card Center and on the rights and legal remedies of the parties can be found in the The “Conditions and information on the use of the Card Center”, which the Company always shares with the parties before using the service.</p>	<p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the kartyagyartas@mol.hu e-mail address.</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>Data will be processed by the Company for 5 years after termination of the card contract concluded with the data subject,, given that the limitation period for civil claims is 5 years.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>T-Systems Magyarország Zrt. (1097 Budapest, Könyves Kálmán krt. 36) – operation and development of card systems</p>
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group’s “Code of Ethics and Business Conduct” and “Business Partner Code of Conduct”.</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group’s “Code of Ethics and Business Conduct”, “Business Partner Code of Conduct”, and “Procedural Rules of the Ethics Committee” (hereinafter jointly referred to as the “Code of Ethics”), which are available at the following link: https://molgroup.info/en/sustainability/ethics-and-governance</p>	<p>Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation.</p> <p>Where action is taken based on the investigation, including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure, any data relating to the report may be processed in the employer’s reporting system at the latest until the definitive conclusion of the proceedings initiated based on a specific report.</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services.</p> <p>(registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu).</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>VIII Exercise of legal claims</p> <p>For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure</p>	<p>Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.</p>	<p>The Company will retain documents related to contractual relationships for a period of 5 years after the termination of a particular contract to exercise any civil law claims of the Company and to defend itself against any civil law claims lodged by data subjects.</p> <p>If the processing of any personal data is necessary for defence or the pursuit of the Company's legitimate interest in court proceedings or in an administrative or out-of-court procedure</p> <p>initiated by a data subject, based on its own legitimate interest, the Company is entitled to process the data (under Article 6(1)(f) of GDPR) until the definitive conclusion of such proceedings or achievement of the legitimate interest by other means (e.g. conclusion of an out-of-court settlement), and, where it is not possible to retain the complete written or electronic document containing the data, the Company is entitled to make an excerpt of the given document having regard to the scope of the necessary data.</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services (registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu).</p>



SLOVAKIA

SLOVNAFT, a.s.

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>I PARTNER PORTAL</p> <p>Operating the Partner Portal and processing user data related to the Portal</p> <p>This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees.</p> <p>Registration system: Partner Portal</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.</p>	<p>With regard to the exercise of claims or fulfilment of obligations: 5 years after the date of cancellation of a particular user account.</p> <p>If registration on the Partner Portal is not followed by registration in one of the subsystems within 90 days, the data will be deleted on the 91st day.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>III WebISA, MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: enabling Partners to use the application/service and to benefit from it, strengthening the partnerships of the Company.</p>	<p>With regard to the exercise of claims or fulfilment of obligations: 5 years after termination of the legal relationship with a particular Partner</p> <p>Where the processing is necessary for the fulfilment of tax obligations to which the Controller (Company) is subject, the data shall be processed for a period of 10 following the year to which the accounting records/invoices pertain 3).</p> <p>Where the data are also necessary for the fulfilment of accounting obligations to which the Controller (Company) is subject and for retaining accounting documents, they must be retained for 10 years following the year to which the accounting documents pertain</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>III.1 MyISA</p> <p>Fuel wholesale (with tank trucks), recording orders of bitumen, domestic LPG in containers and auto LPG, tracking orders, tracking financial settlements.</p> <p>Registration system: Web ISA and MyISA mobile applications</p> <p>Data processing related to the evaluations and feedback given by Partners through MyISA</p> <p>Registration system: corporate mailing system, dedicated e-mail address.</p>	<p>For sole traders, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>The processing is necessary for the performance of the contract means that it is necessary for coordination of the parties' business activities, exercise of their rights and fulfilment of their obligations under the contract.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>With regard to the exercise of claims or fulfilment of obligations: 5 years after termination of the legal relationship with a particular Partner</p> <p>Where the processing is necessary for the fulfilment of tax obligations to which the Controller (Company) is subject, the data shall be processed for a period of 10 following the year to which the accounting records/invoices pertain 4).</p> <p>Where the data are also necessary for the fulfilment of accounting obligations to which the Controller (Company) is subject and for retaining accounting documents, they must be retained for 10 years following the year to which the accounting documents pertain</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>
<p>Data processing related to the provision of information by the Company (contact details for daily contact – changes in the opening hours of a site, service during public holidays, etc.)</p>	<p>Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p>	<p>Until termination of the contractual relationship with the given Partner.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>

³ Act No. 431/2002 Coll. on Accounting as amended, Act No. 222/2004 Coll. on Value Added Tax as amended.

⁴ Act No. 431/2002 Coll. on Accounting as amended, Act No. 222/2004 Coll. on Value Added Tax as amended.

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
	<p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: providing information about the Company's services and products</p> <p>Legitimate interest: providing up-to-date information to Partners in order to ensure smooth service.</p>		
<p>IV OCC (Card Centre)</p> <p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p>	<p>Article 6(1)(a) of GDPR (the freely given consent of the data subject).</p> <p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the palivovekartv@slovnaft.sk e-mail address.</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p> <p>For persons registering on behalf of a Partner, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Controllers or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Controllers (Company).</p>	<p>Data will be processed by the Controllers (Company) for 5 years after termination of the card contract.</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>T-Systems Magyarország Zrt. (1097 Budapest, Könyves Kálmán krt. 36) – operation and development of card systems</p>
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct".</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are available at the following link: https://molgroup.info/en/sustainability/ethics-and-governance</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest).</p> <p>Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation.</p> <p>Where action is taken based on the investigation, including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure, any data relating to the report may be processed in the employer's reporting system at the latest until the definitive conclusion of the proceedings initiated based on a specific report.</p>	<p>MOL IT & Digital GBS Kft. (registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu) – operating the SAP and CRM systems and providing information technology services.</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
https://slovnaft.sk/sk/o-nas/eticke-principy/			
VIII Exercise of legal claims For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure	Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings.	Personal data are stored for 10 years as from the valid resolution of given court proceedings, out-of-court recovery. The storage period commences on the first day of the year following the year in which the court proceedings were validly resolved/out-of-court recovery closed.	MOL IT & Digital GBS Kft. (registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu) – operating the SAP and CRM systems and providing information technology services.

SLOVNAFT MONTÁŽE A OPRAVY a.s.

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
I PARTNER PORTAL Operating the Partner Portal and processing user data related to the Portal This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees. Registration system: Partner Portal	For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract). For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner). Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.	With regard to the exercise of claims or fulfilment of obligations: 5 years after the date of cancellation of a particular user account. If registration on the Partner Portal is not followed by registration in one of the subsystems within 90 days, the data will be deleted on the 91 st day.	MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates
VI Planning tool and Partner Collaboration Portal Data handling and monitoring of requested and received offers with related settlement documentation. Data handling covers the contact data of the requestor legal entities' and other firms' contact person.	For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Partner is party or in order to take steps prior to entering into a contract). For persons registering on behalf of a customer (Partner), Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Controllers). Necessary for contract fulfilment: harmonization of economic activity of the parties, exercising contractual rights, performing the obligations.	With regard to the exercise of claims or fulfilment of obligations: 5 years after termination of the legal relationship with a particular Partner	MOL Magyarország Informatikai Szolgáltató Kft. (1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing Alerant Zrt. (1117 Budapest, Infopark sétány 1.) – system maintenance and updates

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
	Legitimate interest: handling and receiving offers, contact for business purpose, handling settlements.		
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct".</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are available at the following link: https://molgroup.info/en/sustainability/ethics-and-governance https://slovnaft.sk/sk/o-nas/eticke-principy/</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest).</p> <p>Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation.</p> <p>Where action is taken based on the investigation, including action against the reporting person because of the initiation of legal proceedings or the taking of a disciplinary measure, any data relating to the report may be processed in the employer's reporting system at the latest until the definitive conclusion of the proceedings initiated based on a specific report.</p>	<p>MOL IT & Digital GBS Kft. (registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu) – operating the SAP and CRM systems and providing information technology services.</p>
<p>VIII Exercise of legal claims</p> <p>For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest).</p> <p>Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated by a Customer or by any other data subject or in administrative proceedings.</p>	<p>Personal data are stored for 10 years as from the valid resolution of given court proceedings, out-of-court recovery. The storage period commences on the first day of the year following the year in which the court proceedings were validly resolved/out-of-court recovery closed.</p>	<p>MOL IT & Digital GBS Kft. (registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu) – operating the SAP and CRM systems and providing information technology services.</p>



SLOVENIA

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>I PARTNER PORTAL</p> <p>Operating the Partner Portal and processing user data related to the Portal</p> <p>This data processing operation includes the processing of the contact details of Partners and of other users of the Portal, as well as of the contact information of their contact persons, representatives and employees.</p>	<p>For sole traders, primary producers and farmers, Article 6(1)(b) of GDPR (processing is necessary for the performance of a contract to which the Company and the Partner are parties or in order to take steps prior to entering into a contract).</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after the date of cancellation of a particular user account (limitation period set by Civil Obligations Act).</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>Alerant Zrt. (HU-1117 Budapest, Infopark sétány 1) – system maintenance and updates</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
Registration system: Partner Portal	Legitimate interest: registration on the Portal, ensuring that the Portal is suitable for use, and operating the Portal.		
<p>IV Card Centre (OCC)</p> <p>Keeping electronic records about cards, details of Partners (customers) and invoicing information.</p> <p>Additional provisions on the data processing related to the Card Center and on the rights and legal remedies of the parties can be found in the The "Conditions and information on the use of the Card Center", which the Company always shares with the parties before using the service.</p>	<p>Article 6(1)(a) of GDPR (the freely given consent of the data subject).</p> <p>The data subject has the right to withdraw his or her consent at any time. In the electronic mail sent to the kartica@mol.si or kartyagyartas@mol.hu e-mail address.</p> <p>The withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.</p> <p>In the absence of such consent, the OCC (Card Centre) service cannot be provided.</p> <p>For persons registering on behalf of a company, Article 6(1)(f) of GDPR (for the purposes of the legitimate interests pursued by the Company or by the Partner).</p> <p>Legitimate interest: management of evaluations and feedback given by Partners, taking such evaluations and feedback into consideration, where appropriate, and improving the relevant products and services of the Company.</p>	<p>With regard to the exercise of civil claims or fulfilment of obligations under civil law: 5 years after the date of cancellation of a particular user account (limitation period set by Civil Obligations Act).</p>	<p>MOL IT & Digital GBS Kft. (HU-1117 Budapest, Budafoki út 79.) – providing IT and hosting services closely related to the processing</p> <p>T-Systems Magyarország Zrt. (1097 Budapest, Könyves Kálmán krt. 36) – operation and development of card systems</p>
<p>VII Processing related to reports</p> <p>Preventing, detecting and investigating fraud and abuses as well as investigating behaviours that violate MOL Group's "Code of Ethics and Business Conduct" and "Business Partner Code of Conduct".</p> <p>The prevention and investigation of fraud and abuses are governed by MOL Group's "Code of Ethics and Business Conduct", "Business Partner Code of Conduct", and "Procedural Rules of the Ethics Committee" (hereinafter jointly referred to as the "Code of Ethics"), which are available at the following link: https://molgroup.info/en/sustainability/ethics-and-governance</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the prevention and detection of, and holding accountable the persons responsible for, irregularities that jeopardise the assets, business secrets, intellectual property or business reputation of the Company as well as the creation of an adequate working environment that is based on respect and is free from fear and retaliation.</p>	<p>If the investigation shows that the report is unfounded or that no further action is required, all data relating to the report must be deleted in accordance with the rules of procedure within 60 days of the completion of the investigation.</p> <p>However, where the investigation has led to action, including an action against the rapporteur for instituting legal proceedings or disciplinary action, all data relating to the report may be processed in the employer's reporting system at the latest until the final completion of the proceedings initiated under a particular report.</p> <p>MOL Nyrt. and MOL Slovenija d.o.o. they are joint operators. The data controller is not involved in any other data transfer process.</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services.</p> <p>(registered office: HU-1117 Budapest, Budafoki út 79., e-mail address: itu@mol.hu).</p>
<p>VIII Exercise of legal claims</p>	<p>Article 6(1)(f) of the GDPR (the processing is necessary to pursue the Company's legitimate interest). Legitimate interest: the exercise of claims by the Company and successful defence in any contentious proceedings initiated</p>	<p>The time required to complete the proceedings, or 3 years after the termination of the contractual relationship, to enable the execution of any claims of the Company arising from the</p>	<p>MOL IT & Digital GBS Kft. – operating the SAP and CRM systems and providing information technology services</p>

Description and purpose of data processing	Legal basis of data processing	Duration of data processing	Data processor and its processing activity
<p>For the purpose of exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure</p>	<p>by a Customer or by any other data subject or in administrative proceedings. You can read the Balancing Test by clicking here or find it as an attachment to this document.</p>	<p>contract and defense against any claims of the Party (pursuant to Article 349 OZ – Civil Act).</p> <p>Where processing is necessary to fulfill tax obligations relating to accounting documents, the data shall be processed for a period of 5 years from the date on which the relevant tax return is to be filed or when the relevant data should be communicated or reported or if such tax returns / reports / there was no calculation, after the last calendar day of the year in which the tax would have to be paid (first paragraph of Article 125 of ZDavP-2).</p> <p>When the data are also necessary for the fulfillment of accounting obligations to be fulfilled by the Company and for ensuring the proper storage of accounting documents, these data must be kept for 10 years after the end of the year to which the invoices relate (fifth paragraph of Article 86 of ZZDV-1).</p>	<p>(registered office: HU-1117 Budapest, Budafoki út 79, e-mail address: itu@mol.hu).</p>