

# Privacy Notice

## Introduction

FoxPost Zrt. (“Data Controller”) pays special attention to the protection of personal data and to ensuring fair and transparent data processing. To achieve this, a key requirement is to provide transparent and sufficiently detailed information on data processing. This Privacy Notice provides information about the processing of data in connection with the services of the Data Controller, such as the scope of the processed data, the legal basis, purpose and duration of the processing, as well as the rights of the data subject. The privacy notice also contains contact details through which the data subject may obtain answers to any questions he or she may have about data processing. When preparing this notice, the Data Controller has taken into account the recommendations of the National Authority for Data Protection and Freedom of Information and the EU case law. Information on data processing is available and can be downloaded from [www.foxpost.hu](http://www.foxpost.hu).

The data processing practices of the Data Controller as set out in this notice also apply in the case where a sole trader uses the services of FoxPost. In this case, the data subjects are the sole traders. In addition, certain data processing may differ for sole traders and data subjects (consumers), which differences are set out in the privacy notice.

### 1. Legal background of the Data Controller and the data processing

FoxPost Zártkörűen Működő Részvénytársaság („Data Controller” or „FoxPost”)	
<i>Registered seat:</i>	H-3300 Eger, Maklári út 119
<i>Company registration number:</i>	10-10-020309
<i>Mailing address:</i>	H-1097 Budapest, Könyves Kálmán körút 12-14
<i>Email address:</i>	<a href="mailto:info@foxpost.hu">info@foxpost.hu</a>
<i>Website:</i>	<a href="http://www.foxpost.hu">www.foxpost.hu</a>
<i>Online exercise of rights as a data subject:</i>	<a href="https://www.foxpost.hu/ugyfelszolgalat/szemelyes-adatokkal-kapcsolatos-rendelkezes">https://www.foxpost.hu/ugyfelszolgalat/szemelyes-adatokkal-kapcsolatos-rendelkezes</a>

Data Controller has established its data processing in accordance with the following legal provisions:

- regulation (EU) 2016/679 of the European Parliament and of the Council 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 („GDPR”);
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information;
- Act CLIX of 2012 on Postal Services (hereinafter: Postal Act).

## **2. Data processing in connection with delivery to a parcel machine**

2.1. *Purpose of processing:* to deliver the parcel sent to the data subject to the parcel machine indicated by the data subject.

2.2. *Scope of the data processed:* the data processing covers the name of the data subject, the parcel ID, the location of the parcel machine chosen by the data subject and the opening code with which the data subject can collect the parcel from the parcel machine.

2.3. *Legal basis for processing:* processing is necessary for the performance of a contract to which the data subject is a party [Article 6(1)(b) of GDPR].

2.4. *Data subjects:* customers who have chosen to receive their parcels through FoxPost's parcel locker terminals.

2.5. *Period of data processing:* the Data Controller is obliged to keep the data required for accounting, verification and post-clearance checks under the Postal Act for a maximum period of 6 years [until the last day of the fifth calendar year following the date of dispatch]. In the case of a registered user, the information related to the parcels they have sent remains directly accessible in their user account at least until the end of the calendar year after the given postal shipment was dispatched.

2.6. *Categories of recipients:* there are no planned data transfers and the Data Controller does not work with a data processor.

2.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **3. Data processing in connection with delivery to a particular address**

3.1. *Purpose of processing:* delivery of the parcel to the address indicated by the data subject (e.g. home address, work address, etc.).

3.2. *Scope of the data processed:* data processing includes the name of the recipient, the address, the recipient's telephone number, the time interval of delivery, the recipient's signature and the parcel number.

3.3. *Legal basis for processing:* processing is necessary for the performance of a contract to which the data subject is a party [Article 6(1)(b) of GDPR].

3.4. *Data subjects:* customers who have chosen FoxPost's home delivery service to receive their parcels.

3.5. *Period of data processing:* the Data Controller is obliged to keep the data required for accounting, verification and post-clearance checks under the Postal Act for a maximum period of 6 years [until the last day of the fifth calendar year following the date of dispatch]. In the case of a registered user, the information related to the parcels they have sent remains directly accessible in their user account at least until the end of the calendar year after the given postal shipment was dispatched.

3.6. *Categories of recipients:* the Data Controller uses Express One Hungary Kft.'s services as data processor of FoxPost Zrt. for the purpose of home delivery / delivery.

3.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

#### **4. Data processing in relation to parcel delivery**

4.1. *Purpose of processing:* the data subject may also use the Controller's services as a sender if the data subject wishes to send a parcel to a recipient. In this case, the processing of personal data is necessary for the Data Controller to be able to provide the service ordered by the data subject.

4.2. *Scope of the data processed:* the name, street address and number of the sender, the sender's email address and telephone number; the name, email address and telephone number of the recipient, the parcel machine or address chosen for delivery; the amount to be collected by cash on delivery for parcels sent by cash on delivery and the bank account number of the person concerned; debit card identifiers, the details of the parcel (size of the parcel, if fragile, the relevant details); the dispatch code with which the person concerned can dispatch the parcel at the automated parcel machine; the amount to be paid by the person concerned.

4.3. *Legal basis for processing:* processing is necessary for the performance of a contract to which the data subject is a party [Article 6(1)(b) of GDPR].

4.4. *Data subjects:* customers who have chosen FoxPost for the delivery of their parcels.

4.5. *Period of data processing:* the Data Controller is obliged to keep the data required for accounting, verification and post-clearance checks under the Postal Act for a maximum period of 6 years [until the last day of the fifth calendar year following the date of dispatch].

In the case of a registered user, the information related to the parcels they have sent remains directly accessible in their user account at least until the end of the calendar year after the given postal shipment was dispatched.

4.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

4.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

#### **5. Data processing in connection with parcel return**

5.1. *Purpose of processing:* if the data subject, as the recipient, wishes to return the parcel, the purpose of the processing is the successful return of the parcel to the sender.

5.2. *Scope of the data processed:* the data processing covers the name of the data subject, the parcel ID, the location of the parcel machine chosen by the data subject and the opening code with which the parcel was received or generated during the return process (and which code is necessary for the data subject to return the parcel to the machine); the name, email address, telephone number of the original sender, in the case of a collection partner the delivery address or the name and the machine identifier provided for the purpose of returning the parcel.

5.3. *Legal basis for processing:* processing is necessary for the performance of a contract to which the data subject is a party [Article 6(1)(b) of GDPR].

5.4. *Data subjects:* customers who wish to return their parcels to the sender and have chosen FoxPost to do so.

5.5. *Period of data processing:* the Data Controller is obliged to keep the data required for accounting, verification and post-clearance checks under the Postal Act for a maximum period of 6 years [until the last day of the fifth calendar year following the date of dispatch].

In the case of a registered user, the information related to the parcels they have sent remains directly accessible in their user account at least until the end of the calendar year after the given postal shipment was dispatched.

5.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

5.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **6. Processing of data related to the sending of status messages**

6.1. *Purpose of processing:* the purpose of sending status messages is to enable data subjects (both the sender and the recipient) to track their parcels and obtain information on the status of delivery.

6.2. *Scope of the data processed:* the Data Controller uses the name, email address and telephone number of the data subject (for the purpose of sending text messages and Viber messages) to send the status message. The recipient can switch off these Viber messages. Status messages may also contain information related to delivery (e.g: the location of the parcel machine selected by the data subject or the address indicated by the data subject, the telephone number of the data subject, in the case of a parcel machine, an opening code and a QR code which can be used to pick up the parcel).

6.3. *Legal basis for processing:* processing is necessary for the performance of a contract to which the data subject is a party [Article 6(1)(b) of GDPR].

6.4. *Data subjects:* customers who use FoxPost to send or receive their parcels.

6.5. *Period of data processing:* the Data Controller is obliged to keep the data required for accounting, verification and post-clearance checks under the Postal Act for a maximum period of 6 years [until the last day of the fifth calendar year following the date of dispatch].

6.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

6.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **7. Invitation to complete the customer satisfaction survey**

7.1. *Description of the data processing:* the Data Controller may also ask data subjects to fill in a survey as part of the status messages detailed in Section 6. For example, in addition to sending a status message on the completion of the parcel delivery, the Data Controller asks the data subjects to fill in a customer satisfaction survey in the second part of the email. The Data Controller is not aware of any personal data in the case of completed surveys, such as the identity of the persons who completed the survey or the answers given by the data subject when completing the survey.

7.2. *Purpose of processing:* to provide the Data Controller with feedback on the level of satisfaction of its customers, and in which areas there are shortcomings and need for improvement.

7.3. *Scope of the data processed:* The Data Controller uses the name and email address of the data subject to send the status message, which includes a request to complete the survey. The Data Controller does not create a separate database in order to send the request to complete the survey.

7.4. *Data subjects:* customers who have chosen FoxPost for the delivery of their parcels and receive a status message about the location and delivery status of their parcels.

7.5. *Legal basis for processing:* processing is necessary for the performance of a contract to which the data subject is a party [Article 6(1)(b) of GDPR], subject to Article 6(4) of GDPR, which allows for processing for a different purpose, provided that the original purpose of the processing and the new purpose of the processing are compatible.

7.6. *Period of data processing:* In the case of processing for a purpose other than the original purpose, there is no separate processing period, since there is no separate message, but the request to complete the survey is part of the status message, and there is no separate database for this processing, so the processing period for sending the status message is the governing period.

7.7. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

7.8. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **8. Data processing related to invoicing**

8.1. *Purpose of processing:* at the express request of the data subject, Data Controller is legally obliged to issue an invoice for the service provided by Data Controller. Data Controller issues invoices to sole traders.

8.2. *Scope of the data processed:* when issuing an invoice, the Data Controller processes the name, billing address, email address, description of the service and the amount of the service. In the case of sole traders, the data processing also includes the name of the recipient, the amount of the cash on delivery (if the sole trader has sent a cash on delivery parcel) and the tax number.

8.3. *Legal basis for processing:* the legal basis for processing is compliance with legal obligations [set out in Article 6(1)(c) of GDPR]. The obligation to issue an invoice is based on the provisions of Act CXXVII of 2007 on Value Added Tax.

8.4. *Data subjects:* customers registered as sole traders who have chosen FoxPost to deliver their parcels.

8.5. *Period of data processing:* the Data Controller shall store the invoices for 8 years in order to fulfil the obligation to keep records pursuant to Article 169 (2) of Act C of 2000 on Accounting.

8.6. *Categories of recipients:* The Data Controller works with RSM Hungary Zrt. as data processor for accounting purposes. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## 9. Data processing related to registration and user account

9.1. *Purpose of processing:* the purpose of registration is to create a user account through which the data subject can use the services of the Data Controller.

The data subject is not required to have a registration to use all the services of the Data Controller. If the data subject does not have a registration, the Data Controller uses the personal data received from the Sender to deliver the parcel.

9.2. *Scope of the data processed:* in the case of registration, the name, email address, user name, password and telephone number of the data subject. In their profile, data subjects can set their contact address and enter their bank account number and billing address. In the case of sole traders, registration also includes providing their tax number.

9.3. *Legal basis for processing:* the legal basis for processing is the data subject's consent [Article 6(1)(a) of GDPR]. The data subject may withdraw his or her consent at any time.

9.4. *Data subjects:* customers who register on the foxpost.hu platform and wish to use FoxPost's services.

9.5. *Period of data processing:* the Controller processes personal data until the withdrawal of the data subject's consent.

9.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

9.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## 10. Data processing in connection with sending our newsletter

10.1. *Purpose of processing:* to send promotions, advertising about new services, developments, news of public interest or new events of the Data Controller or surveys by email to the data subjects.

10.2. *Scope of the data processed:* Data Controller uses the name and email address of the data subject to send the newsletter. In order to determine the target groups for newsletters, the Data Controller may use the data generated during the use of the service.

10.3. *Legal basis for processing:* the legal basis for processing is the data subject's consent [Article 6(1)(a) of GDPR]. The data subject may withdraw his or her consent at any time.

10.4. *Data subjects:* customers who are registered on foxpost.hu and use FoxPost's services.

10.5. *Period of data processing:* the Controller processes personal data until the withdrawal of the data subject's consent.

10.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

10.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **11. Data processing related to keeping record of previous orders and FOXPOST vouchers**

- 11.1. *Purpose of processing:* to keep record in the data subject's user account of what previous parcel orders the data subject has placed, how many FOXPOST vouchers the data subject has and the value of these vouchers.
- 11.2. *Scope of the data processed:* data related to previous parcels (dispatch code, status, recipient or sender name and email address), number and value of FOXPOST vouchers.
- 11.3. *Legal basis for processing:* the legal basis for processing is the performance of a contract with the data subject [Article 6(1)(b) of GDPR].
- 11.4. *Data subjects:* customers who have chosen FoxPost for parcel delivery.
- 11.5. *Data retention period:* The information regarding the parcels sent by the user will remain available in their user account at least until the end of the calendar year after the respective postal shipment has been dispatched. Otherwise, the Data Controller will store the data for the duration specified in Section 4.
- 11.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.
- 11.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **12. Choosing one's favourite parcel machine**

- 12.1. *Purpose of processing:* to facilitate and simplify the use of the services of the Data Controller by enabling the data subject to receive a package with the data provided in advance.
- 12.2. *Scope of the data processed:* the data processing covers the parcel machine selected by the data subject (favourite parcel machine).
- 12.3. *Legal basis for processing:* consent of the data subject [Article 6(1)(a) of GDPR]. The data subject may withdraw his or her consent or select a different parcel machine at any time.
- 12.4. *Data subjects:* customers who have chosen FoxPost to receive their parcels and who have chosen to specify their preferred parcel machine.
- 12.5. *Period of data processing:* the Controller processes personal data until the withdrawal of the data subject's consent.
- 12.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.
- 12.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **13. Data processing in connection with the FoxPost application**

- 13.1. *Purpose of processing:* to ensure the proper use of the application and to ensure access to certain functions.
- 13.2. *Scope of the data processed:* the application contains data that is also available in the user account. In addition, the application may also use the data subject's location data (provided that the data subject turns this function on).

13.3. *Legal basis for processing:* the legal basis for processing is the performance of a contract with the data subject [Article 6(1)(b) of GDPR].

13.4. *Data subjects:* customers who have chosen FoxPost to deliver their parcels.

13.5. *Data retention period:* Personal data is stored by the Data Controller in the user account and, consequently, in the application until the user requests the deletion of their account. However, this excludes data related to parcels sent by the data subject, which will remain directly available in the application at least until the end of the calendar year after the given postal shipment was dispatched.

13.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

13.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

#### **14. Activities related to marketing and marketing optimisation**

14.1. *Description of data processing:* The Data Controller may use visuals - still and moving images - and audio recordings of its events for its marketing activities. The image and video recordings are processed by the Data Controller for the purpose of promoting its services and activities on its own, rented or earned platforms for marketing and promotional purposes. The scope of the data processed in this context is the facial images and other body parts of persons appearing at the events as they appear in the recording, as well as the voices of these persons (with the possibility of separate image and sound recordings).

14.2. *Purpose of processing:* to plan the marketing activities of the Data Controller and to increase the effectiveness of these activities.

14.3. *Scope of the data processed:* the Data Controller uses the data generated in connection with the use of the service exclusively in an anonymised form, as aggregated personal data. The link between the data subject and the data generated and used cannot be re-established. For this purpose, the Data Controller does not create or store a separate database in which the data subjects are identifiably included.

14.4. *Legal basis for processing:* the legal basis for processing is the legitimate interest of the Controller [Article 6(1)(f) of GDPR]. It is in the legitimate business interest of the Data Controller to plan and execute its marketing activities (including, in particular, online advertising) in such a way that the advertisements reach the most relevant target audience possible.

14.5. *Data subjects:* customers who have chosen FoxPost to receive their parcels.

14.6. *Period of data processing:* The recordings will be processed by the Data Controller for an indefinite period, i.e. for as long as they can reasonably be used for the purpose of the processing as set out in this document.

14.7. *Categories of recipients:* The Data Controller works with ABSTRCT Group Kft. and GoArt Design Bt. as data processors for the compilation of marketing material.

14.8. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

#### **15. Data processing related to complaints and claims management**

15.1. *Purpose of processing*: if the data subject files a complaint or a claim to the Data Controller regarding the Data Controller's services, the Data Controller will investigate the complaint or claim for damages and inform the data subject of the outcome of the investigation (investigation of consumer complaints). If the sole trader uses the services of the Data Controller in the course of his/her business activity, he/she is not considered a consumer under the provisions of Act CLV of 1997 on Consumer Protection, so this processing does not cover complaints filed by sole traders in connection with the service.

15.2. *Scope of the data processed*: Name and address of the data subject; unique identification number of the complaint; place, date and manner of filing the complaint; detailed description of the complaint; list of documents, records and other evidence submitted by the data subject; content of the records, place and date of recording; response to the complaint; relevant data of the package; email address, telephone number and signature of the data subject.

15.3. *Legal basis for processing*: the legal basis for processing in connection with complaint management is the fulfilment of a legal obligation [Article 6 (1) (c) of GDPR; Section 17/A. of the Consumer Protection Act].

15.4. *Data subjects*: customers who file a complaint or claim following their use of FoxPost's services.

15.5. *Period of data processing*: the Data Controller shall keep the complaint and the response for 3 years [Section 17/A (7) of the Consumer Protection Act].

15.6. *Categories of recipients*: There are no planned data transfers and the Data Controller does not work with a data processor.

15.7. *General description of the data security measures applied*: FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **16. Voice recording during complaint management via phone**

16.1. *Purpose of processing*: If the data subject files a complaint or a claim for damages to the Data Controller regarding the Data Controller's services, the Data Controller will investigate the complaint or claim and inform the data subject of the outcome of the investigation (investigation of consumer complaints). For quality assurance reasons, i.e. to ensure that the Data Controller's employees are carrying out telephone calls in accordance with the set standards, that the data subject is properly informed and that the complaint is properly recorded, the Data Controller records the calls.

16.2. *Scope of the data processed*: The voice of the data subject and what was said during the call; name, address of the data subject; unique identification number of the complaint; place, time and manner of filing the complaint; detailed description of the data subject's complaint; list of documents, records and other evidence submitted by the data subject; content of the record, place and date of recording; response to the complaint; relevant data of the parcel; email address and telephone number of the data subject.

16.3. *Legal basis for processing*: The legal basis for the processing of data in connection with the management of complaints is the legitimate interest of the Data Controller [Article 6

(1) (f) of GDPR; Section 17/A of the Consumer Protection Act; Sections 44 (4), 51 and 57 of the Postal Act].

16.4. *Data subjects:* customers who file a complaint or claim following their use of FoxPost's services.

16.5. *Period of data processing:* The retention of personal data (telephone conversations with the data subject) is normally kept by the Data Controller for 8 months from the last telephone conversation with the data subject, however, if during this period consumer protection or other proceedings are initiated in which the audio recording may serve as evidence, the period of retention will continue until the final conclusion of the proceedings.

16.6. *Categories of recipients:* The Data Controller works with Arenim Technologies Fejlesztő és Szolgáltató Kft. as a data processor for the purpose of complaint management and voice recording.

16.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **17. Data processing in connection with other requests addressed to the Data Controller**

17.1. *Purpose of processing:* if the data subject has any questions or requests related to the service of the Data Controller or the use of the application or website, which do not constitute a complaint, the Data Controller will answer them. This includes requests and responses to requests related to data or information security.

17.2. *Scope of the data processed:* the name of the data subject, the contact details provided by the data subject and the personal data contained in his or her emails or letters.

17.3. *Legal basis for processing:* the legal basis for processing is the data subject's consent [Article 6(1)(a) of GDPR]. The data subject may withdraw his or her consent at any time.

17.4. *Data subjects:* customers who contact FoxPost with any questions or requests that do not constitute a complaint .

17.5. *Period of data processing:* the Data Controller shall store the data subject's request and the response for 3 years.

17.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

17.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## **18. Data processing in connection with claims management**

18.1. *Purpose of processing:* if the data subject fails to pay the amount due, the Data Controller or its contracted partner may use the personal data to recover the debt.

18.2. *Scope of the data processed:*

data processed during registration, in connection with the delivery of the parcel or billing, such as the name of the data subject as sender, the address of dispatch (postcode, town, street and house number), the sender's email address and telephone number or the name on the invoice;

the amount to be paid by the data subject.

18.3. *Legal basis for processing:* the legal basis for processing is the legitimate interest of the Controller [Article 6(1)(f) of GDPR]. The Data Controller has a legitimate interest in using personal data to recover the debt by using available means of enforcement if the data subject fails to perform the contract and to pay for the service.

18.4. *Data subjects:* customers who have used FoxPost's services and are in arrears.

18.5. *Period of data processing:* the Data Controller processes personal data in accordance with the limitation rules applicable to civil law claims, in principle for 5 years.

18.6. *Categories of recipients:* There are no planned data transfers and the Data Controller does not work with a data processor.

18.7. *General description of the data security measures applied:* FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## 19. FoxPost Camera surveillance at the parcel machines

19.1. *Purpose of processing:* The Data Controller uses the camera surveillance system at the FoxPost Parcel Machines for the following purposes:

- clarifying the circumstances of unlawful acts (such as theft, vandalism or causing damage),
- investigating complaints about the service (parcel delivery to FoxPost parcel machines),
- the use of recordings as evidence in legal proceedings.

19.2. *Scope of the data processed:* a recording of the data subject (3 photographs).

19.3. *Legal basis for processing:* The legal basis for processing is the legitimate interests of the Data Controller [Article 6(1)(f) of GDPR]. The Data Controller has a legitimate interest in:

- The protection of property by ensuring that, in the event of an unlawful offence (e.g. theft, vandalism, causing damage), the offender can be identified and prosecuted. The Data Controller's asset protection interest primarily relates to FoxPost's Parcel Lockers and the parcels placed in FoxPost's Parcel Machines.
- The Data Controller shall investigate the customer complaints received and clarify the reason why the customer did not receive a parcel meeting his/her expectations [Article 17/A of the Consumer Protection Act; Article 44 (4), Article 51 and Article 57 of the Postal Act].
- In legal proceedings (for example, disciplinary proceedings, judicial, administrative or criminal proceedings launched against the employee), the Data Controller as employer and/or the competent authority must have sufficient evidence.

19.4. *Data subjects*: employees of FoxPost and customers who have used FoxPost's services at FoxPost parcel machines.

19.5. *Period of data processing*: Personal data (photographs) is normally retained by the Data Controller for 8 months from the date of the recording, however, if during this period consumer protection or other proceedings are initiated in which the recording may serve as evidence, the period of data processing shall continue until the final closure of such proceedings.

19.6. *Categories of recipients*: There are no planned data transfers and the Data Controller does not work with a data processor.

19.7. *General description of the data security measures applied*: FoxPost ensures an adequate level of protection of personal data through data security measures in accordance with Article 11 of the Privacy and Data Security Policy.

## 20. Other companies contributing to data processing

The Data Controller works with the following companies as data processors for each of its data processing operations:

*FITS Magyarország Kft.* (email: [info@fits.hu](mailto:info@fits.hu)), performing software operation and support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

*RSM Hungary Zrt.* (email: [foxpost@rsm.hu](mailto:foxpost@rsm.hu)), performing accounting, auditing and other tax and financial advisory services for the Data Controller, and in the course of these activities may have access to personal data.

*Packeta Hungary Kft.* (email: [info@packeta.hu](mailto:info@packeta.hu)), involved in providing the delivery service and may have access to personal data in order to successfully complete the delivery.

*Express One Kft.* (email: [ugyfelszolgalat@expressone.hu](mailto:ugyfelszolgalat@expressone.hu)), involved in providing the delivery service and may have access to personal data in order to successfully complete the delivery.

*Innolog Solutions Kft.* (email: [iroda@innolog.hu](mailto:iroda@innolog.hu)), performing software development, software support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

*R. Olivaw Consulting Szolgáltató Kft.* (email: [an\\_toth@yahoo.com](mailto:an_toth@yahoo.com)), performing software operation and support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

*Ist solution Group Kft.* (email: [balazs@kovago.hu](mailto:balazs@kovago.hu)), performing software development and software support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

The KápiFiveSome Kft. (email: [info@kapi5.hu](mailto:info@kapi5.hu)), performing software development, software support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

*TechPalette Solutions Kft.* (email: [nardelotti.dev@gmail.com](mailto:nardelotti.dev@gmail.com)), performing software development and support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

*DarkIT Kft.* (email: [darkit@darkit.hu](mailto:darkit@darkit.hu)), performing software operation and support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

The *Future of Media Kft.* (email: [info@futureofmedia.hu](mailto:info@futureofmedia.hu)), performing software operation and support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

*Arenim Technologies Kft.* (email: [support@arenimtel.com](mailto:support@arenimtel.com)), providing call centre service including voice recording services, and in the course of these tasks may have access to personal data.

*Dataprognosis Consulting Tanácsadó Kft.* (email: [dataprognosid@gmail.com](mailto:dataprognosid@gmail.com)), performing software operation and support and other IT tasks for the Data Controller, and in the course of these tasks may have access to personal data.

*BillZone Kft.* (email: [support@billzone.eu](mailto:support@billzone.eu)), which is the operator of a program that issues invoices to legal persons, and in the course of its activities may have access to personal data.

*United Call Centers Kft.* (email: [evelin.gazdag@unitedcallcenters.hu](mailto:evelin.gazdag@unitedcallcenters.hu)), which is involved in providing customer service and in the course of this activity may have access to personal data.

*Digital Beaver Marketing Kft.* (email: [info@digitalbeaver.hu](mailto:info@digitalbeaver.hu)), assisting the data controller in optimising its marketing activities.

*Intrum Zrt.* (email: [valasz@intrum.hu](mailto:valasz@intrum.hu)), which may have access to personal data in connection with claims management.

In the course of its marketing activities, Data Controller may share personal data with *Google* and *Meta (Facebook)* in order to ensure the proper usability of their services.

*GKID Research & Consulting Kft.* (email: [info@gkid.hu](mailto:info@gkid.hu)), providing assistance with survey data collection and related services.

*ABSTRACT Group Kft.* (email: [emo@helloabstract.com](mailto:emo@helloabstract.com)), a company that may use the visuals - still and moving images - and audio recordings of the Data Controller's events for its marketing activities.

*GoArt Design Bt.* (email: [faludzsu@gmail.com](mailto:faludzsu@gmail.com)), may using the images provided by the Data Controller for its marketing activities.

## 21. Data security

The Data Controller shall ensure the security of personal data and shall take all measures to prevent unauthorised access, alteration, disclosure, transfer, disclosure, erasure or destruction, accidental destruction or damage and inaccessibility resulting from changes in the technology used.

The Data Controller shall ensure that the processed data cannot be accessed, disclosed, transferred, modified or deleted by unauthorised persons. The Data Controller's employees and data processors are bound by confidentiality obligations with regard to the personal data they process and have access to.

## **22. Rights related to data processing and the rules governing the exercise of those rights**

22.1. *Right to access.* Data subjects may request information about the processing of their personal data. In this case, the Data Controller shall inform the data subject about the personal data processed, the purposes of the processing, the legal basis and period of processing, the data processors, the rights in relation to the processing and the right to file a complaint at the National Authority for Data Protection and Freedom of Information (hereinafter referred to as: Authority). Data subjects may request a copy of their personal data.

22.2. *Right to rectification.* The Data Controller rectifies personal data at the request of the data subject, provided that the data subject indicates which personal data are inaccurate and which are correct.

22.3. *Right to erasure.* Data subjects may request the erasure of their personal data if:

- the data subject withdraws his or her consent,
- the personal data are no longer necessary for the purposes for which they were collected,
- the data subject objects to the processing,
- the personal data have been unlawfully processed,
- the personal data must be deleted in order to comply with a legal obligation to which the Data Controller is subject.

22.4. *Right to restriction.* Data subjects may request the blocking of their personal data if

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data,
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead,
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims,
- if the data subject objects to the processing in accordance with subsection 18.6 of this notice, for the period of time during which the Data Controller complies with the objection.

22.5. *Right to data portability.* In the case of processing based on consent or the performance of a contract, the data subject may request to receive his or her personal data in a commonly known format, in electronic form or to transmit the data to another controller. The Data Controller shall ensure that, upon the explicit request of the data subject, it transfers his or her personal data directly to another controller designated by the data subject.

22.6. *Right to object.* If the data subject objects in a request to the Controller to the processing of his or her personal data on the basis of a legitimate interest, the Controller shall cease processing the data subject's personal data.

22.7. *Common rules on the exercise of rights.* The data subject may exercise his or her rights via the email address or postal address indicated in Section 1. The exercise of the right is free of charge. The Data Controller shall consider the data subject's request and inform him or her of the action taken within a maximum of one month. If the request is refused, the Data Controller shall inform the data subject within one month of receipt of the request of the reasons for the refusal and of the right to lodge a complaint at the Authority and to seek judicial remedy. If the data subject submits a new request after the Data Controller has responded, the one-month time limit for responding shall be reset and the new request shall be dealt with by the Data Controller within one month.

The Data Controller reserves the right, in case of reasonable doubt as to the identity of the person making the request, to request the information necessary to confirm the identity of the data subject.

## 23. Legal remedies

23.1. *Investigation of the data subject's notification by the Data Controller.* The Data Controller asks the data subjects to notify the Data Controller if they consider that the processing does not comply with data protection requirements before applying to the Authority or initiating legal proceedings. The Data Controller undertakes to investigate the data subject's notification within one month and, if justified, to take the necessary corrective measures. The Data Controller shall inform the data subject of its position and, if the notification was justified, of the action taken.

23.2. *Right to turn to the Authority.* The data subject has the right to initiate proceedings before the Authority. Contact details of the Authority (website: [www.naih.hu](http://www.naih.hu); mailing address: H-1363 Budapest, PO box: 9.; email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); telephone: +36 (1) 391 1400). The Authority's official website ([www.naih.hu](http://www.naih.hu)) contains information on how to file a complaint at the Authority.

23.3. *Right to apply to the courts.* If the data subject considers that the Data Controller has infringed his or her right to the protection of personal data, he or she may also initiate legal proceedings and claim compensation for the damage caused to the data subject by the unlawful processing of his or her data or by the breach of data security, and in the case of personal rights violation, the payment of damages. In the case of court proceedings, the person concerned can also bring the case before the court of the place where he or she lives or resides.

## 24. Amendments to the privacy notice

If the Data Controller amends the Privacy Notice, it will post a statement on the website and send a notification of the amendment to the email address provided by the data subject.

Version\_10/04/2025

The information is valid until withdrawn.