

PRIVACY POLICY

on the handling of personal data related to the investigation of a complaint

Pursuant to 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, hereinafter referred to as „GDPR”) and to Hungarian Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, Földgázz szállító Zrt. (hereinafter referred to as „FGSZ” or „Data controller”) provides you– as the data subject with regard to the processing carried out by FGSZ in connection with its whistleblowing system – with the following information.

Purposes of the data processing: investigation of any objections, negative comments, complaints requiring problem management or complaints expressing dissatisfaction with the behavior, activities, services or omissions of FGSZ or of the person acting on behalf of FGSZ.

In order to protect the personal data of people involved in complaint issues, any document prepared or made available in the course of complaint handling procedures shall be treated confidentially, unless otherwise provided for in this Notice.

Legal basis of the data processing: The legal basis of the data processing is that it is necessary for the fulfilment of legal obligations related to the investigation and handling of the complaint (based on GDPR Article 6 (1) c) and Article 9. paragraph (2) point f) and g)).

Based on GDPR Article 6 (1) f) point, in order to clarify the contents of the complaint, as well as to obtain the information necessary to take the measures, the Data Controller has a legitimate interest in reaching the complainant in a short way, by managing the following personal data:

Category	Purpose
Name (obligatory)	contact/information
e-mail adress (obligatory)	contact/information
phone number (not obligatory)	contact/information

Duration of the data processing: We keep the personal data as long as it is necessary to conduct the investigation of the complaint, and the next maximum of 5 years after its conclusion, as well as when a further procedure is initiated based on the investigation, until its final conclusion.



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Description of the data processing activity: The complainant can submit a complaint in the following way: by completing a form on the FGSZ website (www.fgsz.hu). When the form is submitted, an automatic e-mail is generated about the report and is sent to fgszvr@fgsz.hu.

The submitted complaint is investigated by the relevant organizational unit(s) of the FGSZ.

Throughout the process, the contact details of the whistleblower and the entire content of the report are only accessible to the organisational unit(s) responsible for conducting investigations, and accordingly, the records of whistleblowing reports are protected by access control and stored separately from other systems of FGSZ.

Whistleblowing report and documents generated during the related investigations may include personal data relating to natural persons.

“Personal data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data security measures: In order to guarantee the confidentiality, integrity and availability of your personal data, FGSZ stores your data in accordance with IT security rules and standards.

The Data Controller shall protect the data in the framework of risk-proportionate protection, including network, infrastructure and application level protection (firewalls, antivirus programs, storage and communication encryption mechanisms according to the classification of personal and business data). Data stream cannot be decrypted by content filtering and other technical and process solutions. It constantly monitors and manages privacy incidents.

Your data management rights: Your data protection rights and remedies, and their limitations are set out in detail in the GDPR (in particular the GDPR 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82). You may request information about your data at any time, request the correction, deletion or restriction of your data at any time, or object to the processing of data based on a legitimate interest. The most important provisions are summarized below.

Right to be informed: If the Data Controller handles personal data concerning you, the Data Controller is obliged to provide you with information on the most important features of data processing, such as the purpose, legal basis, duration, the identity and contact details of the Data Controller and his representative. In the case of data processing based on a legitimate interest, the Data Controller is obliged to inform you of the data controller's and / or third party's legitimate interest, including your rights and remedies (among others the right to complain to the supervisory authority if you do not already have this information).



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Access right: You have the right to receive feedback from the Data Controller as to whether the processing of your personal data is in progress, and if such data processing is in progress, you have the right to access personal data and certain information related to data processing, including the purposes of the processing, the categories of personal data concerned, the recipients of the personal data, the (intended) duration of the processing, the data subject's rights and remedies (including the right to lodge a complaint with the supervisory authority) and, if collected, the source of the data.

Upon your request, the Data Controller will provide you with a copy of the personal data that is the subject of the data processing. The Data Controller may charge a reasonable fee based on administrative costs for any additional copies you request. The right to request a copy must not adversely affect the rights and freedoms of others. Upon request, the Data Controller will provide information on the possibility of issuing a copy, its method, possible costs and other details.

Right to correction: You have the right to request from the Data Controller, to correct inaccurate personal data concerning you without undue delay. Taking into account the purpose of the data processing, you have the right to request incomplete personal data to be supplemented, also with a supplementary statement.

Right to deletion: You have the right to request the Data Controller to delete your personal data without undue delay, and the Data Controller is obliged to delete your personal data without undue delay, if certain conditions are met. Among others, the Data Controller is obliged to delete your personal data at your request, if the personal data are no longer needed for the purpose for which they were collected or processed for; if you withdraw your consent on the data processing and there is no other legal basis for the data processing; or personal data was processed unlawfully; or you object to the processing and there is no other prioritized legitimate reason for the processing; personal data must be deleted in order to fulfil the legal obligation the European Union or Member State law; personal data was collected in connection with the provision of information society services.

Right to restrict data processing: You have the right to request the Data Controller to restrict the data processing if one of the following is met:

- a) You dispute the accuracy of the personal data. In this case, the restriction applies to the period of time that allows the Data Controller to verify the accuracy of the personal data;
- b) The processing is unlawful and you object to the deletion of the data and instead request a restriction on their use;
- c) The Data controller no longer needs the personal data for the purpose of data processing, but you request the data in order to make, enforce or protect legal claims;



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- d) You have objected to the data processing; in this case, the restriction applies for the period until it is determined whether the legitimate reasons of the Data Controller has legal priority over your legitimate reasons.

If the processing is subject to restrictions as per above, personal data may only be obtained with your consent, with the purpose to enforce or protect legal claims, to protect the rights of another natural or legal person or in the important public interest of the Union. (Exception from this is data storage).

If the data management restriction is lifted, the Data controller will inform you in advance.

Right to object: You have the right to object against the processing of your personal data, which is in the legitimate interest of the Data controller for reasons related to your situation.

In this case, the Data Controller may not further process the personal data, unless the Data controller can prove that the data processing justified by compelling legitimate reasons, which take precedence over your interests, rights and freedom, or which are required to enforce or protect legal claims. If you exercise your right to object, the Data controller will examine whether the objection is well-founded.

Possibility of data transmission: The transmission of personal data given during the investigation of your complaint is carried out exclusively to the competent consumer protection authorities, conciliation bodies, competent courts, as well as to the employee of the FGSZ dealing with complaint handling, or, if another company is also involved in the complaint, to that company. The Data controller is entitled and obliged to forward to the competent authorities all personal data which the Data controller has legally stored if the Data controller is obliged by law or by binding official obligation. The data controller cannot be held responsible for the transmission of such data and the resulting consequences.

The rights of the data subjects related to data management can be found in the general Privacy Policy on the website www.fgsz.hu.