

PRIVACY POLICY AND THE DESCRIPION OF PROCEDURE FOR THE VISITORS OF THE WEBSITE

Pursuant to the Regulation (EU) 2016/679 of the European Parliament and 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), the **Debreceni Hőszolgáltató Zártkörűen Működő Részvénytársaság** (*hereinafter referred to as: Controller*) *hereby notifies you of any facts related to the processing of your personal data.* With the participation in the process, you as data subject become the data subject of data processing according to the process description below.

NAME AND CONTACTS OF THE CONTROLLER:

Name: Debreceni Hőszolgáltató Zártkörűen Működő Részvénytársaság

Registered seat: H-4025 Debrecen, Hatvan utca 12-14.

Postal address: H-4001 Debrecen, Pf. 119.

Website: www.dhrt.hu

Central phone number: +36 (52) 509-409

NAME AND CONTACTS OF THE DATA PROTECTION OFFICER OF THE CONTROLLER:

SZEIFERT Péter

Tel.: +36-20-9447015

E-mail: p.szeifert@euroinford.hu

www.euroinford.hu

DATA PROCESSING REGARDING CONTACTS

DESCRIPTION OF THE DATA PROCESSING PROCESS:

The *Controller* is operating an own website at www.dhrt.hu.

The *Controller* ensures the visitor to contact the *Controller* via the website operated by it. Via the menu “Contact”, the data subject may send his/her message by entering his/her name, e-mail address and the subject. However, the data can be sent by the data subject only if he/she accepts the data processing rules by checking a checkbox, otherwise the message cannot be sent.

This shall apply also to the data aiming not direct contact but another administrative task. If another data processing shall be launched according to the information sent on the basis of the entered data, the data are forwarded to the competent administration location within the *Controller*, and data processing is performed there as detailed in the given location.

The storage space and IT service provider of the *Controller* is the DV Info Informatikai Kft. which is qualified as the processor of the *Controller*.

AIM OF DATA PROCESSING:

to facilitate the contact with the *Controller*

LEGAL BASIS OF DATA PROCESSING:

The legal basis of the data processing shall be the **item e) of the paragraph (1) of the article 6 of the GDPR** stipulating that “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”, which ASSIMILATES AND ABSORBS THE FURTHER LEGAL BASES OF DATA PROCESSING, in this case the legal basis of the consent of the data subject as determined in the item a) of the paragraph (1) of the Article 6 of the GDPR.

(based on the president’s position determined in the report NAIH B/4542)

PROCESSED SET OF DATA:

name, e-mail address, subject of the message, text of the message

DURING DATA PROCESSING, DATA ARE FORWARDED TO THE FOLLOWING THIRD PERSONS, WITH THE INDICATED LEGAL BASIS:

The *Controller* does not forward the data to third parties, however, it calls the attention of the data subjects to that law may require the forwarding of personal data to courts or authorities. If in a court or authority procedure required by law the *Controller* is obliged to transfer personal data, the *Controller* shall provide the requested data to the proceeding court or authority in compliance with its legal obligations.

INTERVAL OF THE STORAGE OF PERSONAL DATA:

until the settling of the case (until the achievement of the purpose) or until the request on erasure by the data subject

FACT OF AUTOMATED DECISION-MAKING:

During data processing, no automated decision-making is performed.

RULES ON THE EXERCISING OF THE RIGHTS OF DATA SUBJECTS:

The *Controller* hereby informs you of that based on the GDPR, you, after proving your personal identity, shall have the following possibilities to exercise your rights regarding the data processing hereunder:

- you may get notification on processing of personal data,
- you may request the rectification of your personal data,
- you may request the erasure of your personal data (if the conditions determined in the paragraph (1) of the article 17 of the GDPR are met),
- you may request the restriction of the processing of your personal data,
- you may object to processing.

DATA PROCESSING REGARDING THE ONLINE BOOKING OF APPOINTMENT

DESCRIPTION OF THE DATA PROCESSING PROCESS:

The users may book an appointment via the website of the Company for personal administration.

To do so, the user must click the Appointment Booking of the Client Service at the website of the Company.

The user must select his/her user type, and the types of data to enter vary accordingly. After entering the data, the user may select a case type and a time slot in the calendar. To finalise the booking of appointment, the user must accept the rules of data processing by checking a checkbox.

The storage space and IT service provider of the *Controller* is the DV Info Informatikai Kft. which is qualified as the processor of the *Controller*.

AIM OF DATA PROCESSING:

to facilitate online booking of appointment

LEGAL BASIS OF DATA PROCESSING:

The legal basis of the data processing shall be the **item e) of the paragraph (1) of the article 6 of the GDPR** stipulating that “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”, which ASSIMILATES AND ABSORBS THE FURTHER LEGAL BASES OF DATA PROCESSING, in this case the legal basis of the consent of the data subject as determined in the item a) of the paragraph (1) of the Article 6 of the GDPR.

(based on the president’s position determined in the report NAIH B/4542)

PROCESSED SET OF DATA:

Existing user:

Last name, first name, payer code, e-mail address, selected case type, booked date and time

New user:

Last name, first name, address of the place of consumption, e-mail address, selected case type, booked date and time

DURING DATA PROCESSING, DATA ARE FORWARDED TO THE FOLLOWING THIRD PERSONS, WITH THE INDICATED LEGAL BASIS:

The **Controller** does not forward the data to third parties, however, it calls the attention of the data subjects to that law may require the forwarding of personal data to courts or authorities. If in a court or authority procedure required by law the **Controller** is obliged to transfer personal data, the **Controller** shall provide the requested data to the proceeding court or authority in compliance with its legal obligations.

INTERVAL OF THE STORAGE OF PERSONAL DATA:

until the settling of the case (until the achievement of the purpose) or until the request on erasure by the data subject

FACT OF AUTOMATED DECISION-MAKING:

During data processing, no automated decision-making is performed.

RULES ON THE EXERCISING OF THE RIGHTS OF DATA SUBJECTS:

The **Controller** hereby informs you of that based on the GDPR, you, after proving your personal identity, shall have the following possibilities to exercise your rights regarding the data processing hereunder:

- you may get notification on processing of personal data,
- you may request the rectification of your personal data,
- you may request the erasure of your personal data (if the conditions determined in the paragraph (1) of the article 17 of the GDPR are met),
- you may request the restriction of the processing of your personal data,
- you may object to processing.

DATA PROCESSING REGARDING THE ONLINE ADMINISTRATION VIA ZAFIR

DESCRIPTION OF THE DATA PROCESSING PROCESS:

From September 2020, the Debreceni Vagyonkezelő Zrt. and its member companies are operating the [Zafir Portal](#) with modern appearance and renewed services to substitute the former e-invoice system. In the platform developed by the DV Info Informatikai Kft., the clients of the Debreceni Vízmű Zrt., the Debreceni Hőszolgáltató Zrt. and the Cívis Ház Zrt. can perform the administration of their cases online: they can pay their invoices, monitor their balance and report their meter readings. For registration and online administration, use the site <https://zafirportal.hu>.

The IT service provider of the **Controller** and the operator of the Zafir Portal is the DV Info Informatikai Kft. which is qualified as the processor of the **Controller**.

AIM OF DATA PROCESSING:

to facilitate online administration

LEGAL BASIS OF DATA PROCESSING:

The legal basis of the data processing shall be the **item e) of the paragraph (1) of the article 6 of the GDPR** stipulating that “processing is necessary for the performance of a task carried out in the public

interest or in the exercise of official authority vested in the controller”, which ASSIMILATES AND ABSORBS THE FURTHER LEGAL BASES OF DATA PROCESSING, in this case the legal basis of the consent of the data subject as determined in the item b) of the paragraph (1) of the Article 6 of the GDPR stipulating that “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”.

(based on the president’s position determined in the report NAIH B/4542)

PROCESSED SET OF DATA:

- personal data processed in case of the online reporting of meter readings: name of the consumer, place of consumption, code of the place of consumption, serial number of the water meter, meter reading, date of reading, e-mail address of the consumer
- personal data processed during online invoice payment or balance inquiry: name and address of the consumer, tax number and bank account number of the consumer, fees based on the services agreement, current balance

DURING DATA PROCESSING, DATA ARE FORWARDED TO THE FOLLOWING THIRD PERSONS, WITH THE INDICATED LEGAL BASIS:

The *Controller* does not forward the data to third parties, however, it calls the attention of the data subjects to that law may require the forwarding of personal data to courts or authorities. If in a court or authority procedure required by law the *Controller* is obliged to transfer personal data, the *Controller* shall provide the requested data to the proceeding court or authority in compliance with its legal obligations.

INTERVAL OF THE STORAGE OF PERSONAL DATA:

Pursuant to the section 169 of the Act C of 2000 on Accounting, the personal data shall be stored by the *Controller* until 8 years after the termination of the services agreement. .

FACT OF AUTOMATED DECISION-MAKING:

During data processing, no automated decision-making is performed.

RULES ON THE EXERCISING OF THE RIGHTS OF DATA SUBJECTS:

The *Controller* hereby informs you of that based on the GDPR, you, after proving your personal identity, shall have the following possibilities to exercise your rights regarding the data processing hereunder:

- you may get notification on processing of personal data,
- you may request the rectification of your personal data,
- you may request the erasure of your personal data (if the conditions determined in the paragraph (1) of the article 17 of the GDPR are met),
- you may request the restriction of the processing of your personal data,
- you may object to processing.

DATA PROCESSING RELATED TO THE USE OF COOKIES

AIM OF DATA PROCESSING:

Automatic data recording about login data and user behaviours about the visitors of the website, with the help of cookies.

LEGAL BASIS OF DATA PROCESSING:

The legal basis of the data processing shall be the **item e) of the paragraph (1) of the article 6 of the GDPR** stipulating that “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”, which ASSIMILATES AND ABSORBS THE FURTHER LEGAL BASES OF DATA PROCESSING, in this case the legal basis of the consent of the data subject as determined in the item a) of the paragraph (1) of the Article 6 of the GDPR.

(based on the president’s position determined in the report NAIH B/4542)

PROCESSED SET OF DATA:

IP address, time of stay at the website, topographical data, user behaviour, starting and finishing time of the visit by the user, in certain cases - depending on the settings of the computer of the user - the type of browser and operation system.

DURING DATA PROCESSING, DATA ARE FORWARDED TO THE FOLLOWING THIRD PERSONS, WITH THE INDICATED LEGAL BASIS:

The *Controller* does not forward the data to third parties, however, it calls the attention of the data subjects to that law may require the forwarding of personal data to courts or authorities. If in a court or authority procedure required by law the *Controller* is obliged to transfer personal data, the *Controller* shall provide the requested data to the proceeding court or authority in compliance with its legal obligations.

INTERVAL OF THE STORAGE OF PERSONAL DATA:

The Controller processes the data for 30 days after the visit of the website.

FACT OF AUTOMATED DECISION-MAKING:

During data processing, no automated decision-making is performed.

DESCRIPTION OF THE DATA PROCESSING PROCESS:

Anyone can access to the websites without revealing his/her identity or providing his/her personal data, and anyone can get information at the website and the sites linked thereto freely, without any restrictions.

The *Controller* is performing web analytical processes at the website. The analytics installs cookies on the computer of the user to help in analysing the use of the website. However, the *Controller* does not link the data on the use of the website, as generated by the cookies (the IP address of the visitor), with any other data.

The data obtained by the analytics are used to assess and analyse the use of the website by the user, to make reports on the activities performed on the website and to provide services regarding the activities performed on the website and internet use.

The users can delete the cookies from the browser.

The storage space and IT service provider of the *Controller* is the DV Info Informatikai Kft. which is qualified as the processor of the *Controller*.

The *Controller* shall ensure the safety of data and take all technical and organisational measures necessary for the compliance with the GDPR and other data protection and confidentiality regulations. The data are protected against unauthorised access, alteration, disclosure, publication, erasure, accidental and unlawful destruction and damage.

RULES ON THE EXERCISING OF THE RIGHTS OF DATA SUBJECTS:

The *Controller* hereby informs you of that based on the GDPR, you, after proving your personal identity, shall have the following possibilities to exercise your rights regarding the data processing hereunder:

- you may get notification on processing of personal data,
- you may request the rectification of your personal data,
- you may request the erasure of your personal data (if the conditions determined in the paragraph (1) of the article 17 of the GDPR are met),
- you may request the restriction of the processing of your personal data,
- you may object to processing.

The **Controller** shall ensure the safety of data and take all technical and organisational measures necessary for the compliance with the GDPR and other data protection and confidentiality regulations. The data are protected against unauthorised access, alteration, disclosure, publication, erasure, accidental and unlawful destruction and damage.

The **Controller** strives to issue you in every case a concise, transparent, intelligible and easily accessible notification using clear and plain language, in compliance with the regulations of GDPR.

If you intend to exercise your rights determined in the GDPR regarding the aims indicated herein, you can primarily submit your application in writing to the data protection officer, via the contact data hereunder. Should you request verbal notification instead, after certifying your personal identity, the authorised employee of the **Controller** may give you verbal notification as well, if the data necessary for such notification is available for him/her. In any other cases, our employee shall record your application, and within 1 month after the receipt of your application, you shall be notified of the outcome of your application. This deadline may be prolonged at most by further two months if it is justified by necessity of the application or the number of the actually treated applications, however, you shall be notified of the need for prolongation within a month after the receipt of your application.

If we fail to take any measures according to your application, or you reject our measure, you may apply for legal remedy. You may submit your complaint against our data processing procedure to the Hungarian National Authority for Data Protection and Freedom of Information or the Tribunal having territorial scope of authority in your home address or place of residence.

However, we call your attention that based on the practice of the Hungarian National Authority for Data Protection and Freedom of Information, this authority receives your complaint if you have already contacted the controller, i.e. us, but we refused to take measures according to your request or you refused to accept our measure. Therefore, it is recommended to contact first our data protection officer.

Debrecen, 01 March 2022

Debreceni Hőszolgáltató Zártkörűen Működő Részvénytársaság