

EXPRESS ONE – PRIVACY POLICY**(“Privacy Notice”)****DATA RELATING TO THE CONTROLLER**

Express One Hungary Korlátolt Felelősségű Társaság (hereinafter referred to as “**Express One**”) pays particular attention to the protection of personal data processed and managed in connection with the use of its parcel services and to compliance with the applicable privacy legislation.

With this in mind, in this Privacy Notice, Express One aims to provide comprehensive, transparent and concise information about its data processing activities.

This Privacy Policy forms Annex 7 to Express One's current General Terms and Conditions (“**GTC**”). This Privacy Notice aims to provide data subjects with adequate information in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (“**GDPR**”). Access and download the GTC at the following link: http://expressone.hu/public/ASZF_2018_05_04.pdf. Access and download this Privacy Notice at: https://expressone.hu/public/Express_One_Hungary_Kft_Adatkezesesi_tajekoztato.pdf.

Subject to changes in the underlying legal environment, Express One expressly reserves the right to amend and/or repeal this Privacy Notice at any time without prior direct notice to the data subjects. In the event of a modification to this Privacy Notice, Express One will publish a notice and an alert on its website (<http://www.expressone.hu>) at least 15 days before the amendment(s) take effect.

The details of Express One are as follows:

Name of the controller:	Express One Hungary Korlátolt Felelősségű Társaság
Registered office:	H-1239 Budapest, Európa utca 12.
Company registration number:	01-09-980899
Tax identification number:	13947109-2-43
Website:	http://www.expressone.hu
Email address:	ugyfelszolgalat@expressone.hu
Fax:	(+36) 1 8 777 499
Postal address:	H-1239 Budapest, Európa utca 12.
Community tax ID number:	HU13947109

Should you have any questions or comments about Express One's data processing and/or this Privacy Notice, or if you wish to exercise any of the data subject rights provided in this Privacy Notice, you are entitled to notify Express One using the contact details set out in Clause 4(II) hereof.

I. DETAILS OF THE PROCESSING ACTIVITY

EXPRESS ONE CARRIES OUT DATA PROCESSING ACTIVITIES IN RELATION TO THE FOLLOWING ACTIVITIES:

A. COURIER AND EXPRESS POSTAL SERVICES

Subject to Act CLIX of 2012 on Postal Services (hereinafter: "**Postal Services Act**")

- 1) Domestic and international delivery to contracted partners and occasional customers (courier and express postal services) for delivery by courier
- 2) Domestic delivery to contracted partners (courier and express postal services) for delivery at parcel lockers
- 3) EURODIS
- 4) Other postal services not replacing the universal service

and shipping services subject to Act V of 2013 on the Civil Code

- 5) (hereinafter: "Civil Code")

B. OTHER DATA PROCESSING

1. Damage management
2. Claims management

A. COURIER AND EXPRESS POSTAL SERVICES

1. DOMESTIC DELIVERY FOR CONTRACTED AND AD HOC CUSTOMERS, DELIVERY BY COURIER

1.1. Description of the service

Domestic home delivery is a service provided to both natural person and corporate consignors, whereby Express One delivers or attempts to deliver the consignment the consignor wishes to send and hands over to Express One, to the consignee or person entitled to receive it, as specified by the consignor, subject to the conditions set out in the GTC and as set out in the courier service contract concluded between the parties for home delivery.

1.1.1. For ad hoc consignors

In the event of contracts concluded by an ad hoc principal by filling in the consignment note, the order form or by registering online (eBox).

For the purposes of this section, Express One is a controller.

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
1	Natural person consignor	Collected by Express One from the data subject: name; address; billing address; place of birth; date of birth; mother's maiden name; tax identification number; telephone number; fax number; email address	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act and Article 7(1) of the Postal Services Decree ¹]	Preparation and performance of the postal services contract, accounting, verification and ex-post control of the performance, provision of data to the supervisory authority, and liaising.
		for contracts concluded via eBox: Collected by Express One	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND	Drafting a contract for the provision of services relating to the information society,

¹ Government Decree No. 335/2012. (XII. 4.) on the detailed rules for the provision of postal services and the postal service for official documents, and on the general terms and conditions of postal service providers and on items excluded from or conditionally deliverable by postal services (hereinafter: "Postal Services Decree")

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
		from the data subject: natural person's identification data required for identification; address; date, duration and place of use of the service; personal data technically necessary for the provision of the service.	Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 13/A (1)–(3) of the E-Commerce Act.	determination and amendment of its content, monitoring its performance, invoicing the fees arising from it, and liaising for the purpose of pursuing claims in relation to it.
		For contracts concluded via eBox: Collected by Express One from the data subject: email address.	Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 6(2) of the E-commerce Act ²] AND Article 6(1)(f) of the GDPR (processing is necessary for asserting Express One's legitimate interests).	To confirm receipt of the customer's order to the customer by electronic means without delay, and to conclude the contract.
2	Natural person representing the contracting party	Collected from the natural person representing the contracting party: name; telephone number; fax number.	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act]	Preparation for and performance of the contract to be concluded with the contracting party and for the postal services contract, settlement of accounts with, certification and post-contractual control of performance, reporting data to the supervisory authority, and liaison.

² Act CVIII of 2001 on Specific Issues Related to Electronic Commerce and on Information Society Services (hereinafter: “E-Commerce Act”)

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
		<p>for contracts concluded via eBox:</p> <p>Collected by Express One from the natural person representing the contracting party: natural person's data required for identification; address; date, duration and place of use of the service;</p> <p>personal data technically necessary for the provision of the service.</p>	<p>Article 6(1)(b) of the GDPR (processing is required for the performance of the contract)</p> <p>AND</p> <p>Article 6(1)(c) of the GDPR (required for the performance of a legal obligation)</p> <p>[legislation containing legal obligations: Article 13/A (1)–(3) of the E-Commerce Act.</p>	<p>Preparation a contract for the provision of services relating to the information society, determination and amendment of its content, monitoring its performance, invoicing the fees arising from it, and liaising for the purpose of pursuing claims in relation to it.</p>
		<p>for contracts concluded via eBox:</p> <p>Collected by Express One from the natural person representing the contracting party: email address</p>	<p>Article 6(1)(c) of the GDPR (required for the performance of a legal obligation)</p> <p>[legislation containing legal obligations: Article 6(2) of the E-commerce Act³]</p> <p>AND</p> <p>Article 6(1)(f) of the GDPR (processing is necessary for asserting Express One's legitimate interests).</p>	<p>To confirm receipt of the customer's order to the customer by electronic means without delay, and to conclude the contract.</p>

² Act CVIII of 2001 on Specific Issues Related to Electronic Commerce and on Information Society Services (hereinafter: "E-Commerce Act")

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
3	Natural person consignee	Collected and transmitted by the consignor: name, residential address, delivery address, place of birth; date of birth; mother's maiden name; tax identification number; phone number; fax number; email address	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act]	Preparation and performance of the postal services contract, accounting, verification and ex-post control of the performance, provision of data to the supervisory authority, and liaising.
		Collected and transmitted by the consignor (as other data controller): email address	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services)
		Possibly collected from the consignor or the consignee: different delivery address and/or date. It may also include an email address or phone number other than the one previously specified, as well as the information provided by the modifying party in the comment box.	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 41(6) of the Postal Services Act and Article 9(3) of the Postal Services Decree] and Article 6(1)(a) and (f) of the GDPR (consent and legitimate interest)	Preparation and performance of the postal services contract, settlement of accounts with, certification and ex-post control of its performance.
		Collected from the consignee: signature, personal	Article 6(1)(b) of the GDPR (processing is required	Number and type of identification

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
		document for the postal services contract	for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Articles 41(10) and 54(1) of the Postal Services Act and Article 22(5)(a) of the Postal Services Decree ⁴]	fulfilment of the related legal obligations, proof of performance of the contract, and compliance with legal obligations.
		Result of the satisfaction survey made with the consignee and the waybill number.	Article 6(1)(a) of the GDPR (the data subject's consent)	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
4	Natural person representing the consignee (or other person entitled to receive the consignment)	Collected and transmitted by the sender or the natural person consignee: name, residential address, phone number;	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act]	Preparation and performance of the postal services contract, accounting, verification and ex-post control of the performance, provision of data to the supervisory authority, and liaising.
		Collected and transmitted by the consignor (as other data controller): email address	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).

³ Government Decree No. 335/2012. (XII. 4.) on the detailed rules for the provision of postal services and the postal service for official documents, and on the general terms and conditions of postal service providers and on items excluded from or conditionally deliverable by postal services (hereinafter: "Postal Services Decree")

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
		Possibly collected from the consignor or the consignee: different delivery address and/or date. It may also include an email address or phone number other than the one previously specified, as well as the information provided by the modifying party in the comment box.	<p>Article 6(1)(b) of the GDPR (processing is required for the performance of the contract)</p> <p>AND</p> <p>Article 6(1)(c) of the GDPR (required for the performance of a legal obligation)</p> <p>[legislation containing legal obligations: Article 41(6) of the Postal Services Act and Article 9(3) of the Postal Services Decree]</p> <p>and Article 6(1)(a) and (f) of the GDPR</p> <p>(consent and legitimate interest)</p>	Preparation and performance of the postal services contract, settlement of accounts with, certification and ex-post control of its performance.
		Collected from the person representing the consignee: signature; number and type of the document that can be used for personal identification; indicating the relationship between the consignee and the representative or the capacity of the consignee.	<p>Article 6(1)(b) of the GDPR (processing is required for the performance of the contract)</p> <p>AND</p> <p>Article 6(1)(c) of the GDPR (required for the performance of a legal obligation)</p> <p>[legislation containing legal obligations: Articles 41(10) and 54(1) of the Postal Services Act and Article 22(5)(a) of the Postal Services Decree]</p> <p>OR</p> <p>[Article 6(1)(f) of the GDPR] (required for the</p>	Fulfilment of the legal obligation relating to the contract for postal services, proof of fulfilment of the contract, and compliance with the legal obligation.

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
			enforcement of the data controller's legitimate interests)	
		Result of the satisfaction survey made with the natural person representing the consignee and the waybill number.	Article 6 (1)(a) of the GDPR (consent of the data subject)	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/ improving the quality of its services) . .
5	Witness	Collected from the witness: his/her capacity; name, age, signature; data relating to proof of identity	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 26(1) of the Postal Services Decree]	Proof of delivery of a registered consignment to a consignee who is illiterate, does not know Latin characters or is otherwise unable to write, and proof of the consignee's eligibility.
6	Legal representative or guardian	Collected from the legal representative: data required for personal identification; signature; Collected from a guardian: non-appealable official decision; official identity card or official certificate, signature	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 26(1) of the Postal Services Decree]	Proof of delivery of a personal delivery request to a natural person who is incapacitated or subject to guardianship that excludes his or her capacity to act.

1.1.2. For a contracted partner consignor

For the purposes of this section, Express One is a controller.

	Data subject	Processed personal data of the data subject and its source	Legal basis for data processing	Purpose of data processing
1	The natural person representing the contracted partner	Collected from the natural person representing the contracting party: name; phone number; and fax number.	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act]	Preparation and performance of the contract concluded with contractual partners for postal services, accounting, verification and ex-post control of the performance, and provision of data to the supervisory authority, and liaising.
2	Natural person consignee	Collected and transmitted by the contractual partner: name, residential address, place of birth; date of birth; mother's maiden name; tax identification number; phone number; fax number; email address	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act]	Preparation and performance of the postal services contract, accounting, verification and ex-post control of the performance, provision of data to the supervisory authority, and liaising.
		Collected and transmitted by the contractual partner: email address	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
		Possibly collected from the consignor or the consignee: different delivery address and/or date. It may also include an e-mail	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND	Preparation and performance of the postal services contract, settlement of accounts with,

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
		address or phone number other than the one previously provided, and the information provided by the amending party in the comment box.	Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 41(6) of the Postal Services Act and Article 9(3) of the Postal Services Decree] and Article 6(1)(a) and (f) of the GDPR (consent and legitimate interest)	certification and ex-post control of its performance.
		Collected from the consignee: signature, the type and number of the document that can be used for personal identification	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Articles 41(10) and 54(1) of the Postal Services Act and Article 22(5)(a) of the Postal Services Decree]	Fulfilment of the legal obligation relating to the contract for postal services, proof of fulfilment of the contract, and compliance with the legal obligation.
		Result of the satisfaction survey made with the consignee and the waybill number.	Article 6(1)(a) of the GDPR (the data subject's consent)	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
3	Natural person representing the consignee (or other	Collected and transmitted by the contractual partner or the natural person consignee (as other data controller): name;	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND	Preparation and performance of the postal services contract, settlement of accounts with, certification and ex-post control

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
	person entitled to receive the consignment)	residential address; phone number;	Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act]	of its performance, provision of data to the supervisory authority, and liaising.
		Collected and transmitted by the contractual partner: email address	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
		Possibly collected from the consignor or the consignee: different delivery address and/or date. It may also include an email address or phone number other than the one previously specified, as well as the information provided by the modifying party in the comment box.	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 41(6) of the Postal Services Act and Article 9(3) of the Postal Services Decree] and Article 6(1)(a) and (f) of the GDPR (consent and legitimate interest)	Preparation and performance of the postal services contract, settlement of accounts with, certification and ex-post control of its performance.
		Collected from the person representing the consignee: signature; number and type of the document that can be used for personal identification; indicating the	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation)	Fulfilment of the legal obligation relating to the contract for postal services, proof of fulfilment of the contract, and compliance with

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
		relationship between the consignee and the representative or the capacity of the consignee.	[legislation containing legal obligations: Articles 41(10) and 54(1) of the Postal Services Act and Article 22(5)(a) of the Postal Services Decree] AND [Article 6(1)(f) of the GDPR] (required for asserting the data controller's legitimate interests)	a legal obligation.
		Result of the satisfaction survey made with the natural person representing the consignee and the waybill number.	Article 6(1)(a) of the GDPR (the data subject's consent)	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
4	Witness	Collected from the witness: his/her capacity; name, age, signature; data relating to proof of identity	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 26(1) of the Postal Services Decree]	Proof of delivery of a registered consignment to an consignee who is illiterate, does not know Latin characters or is otherwise unable to write, and proof of the consignee's eligibility.
5	Legal representative or guardian	Collected from the legal representative: data required for personal identification; signature;	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6 (1)(c) of the GDPR	Proof of delivery of a personal delivery request to a natural person who is incapacitated or subject to guardianship that excludes

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
		Collected from a guardian: non-appealable official decision; official identity card or official certificate, signature	(required for the performance of a legal obligation) [legislation containing legal obligations: Article 26(2) of the Postal Services Decree]	his or her capacity to act.

2. DOMESTIC DELIVERY TO CONTRACTED PARTNERS FOR DELIVERY TO A PARCEL LOCKER

2.1 Description of the service

Parcel locker service is defined in Clause 7.1 of the GTC.

2.1.1 For a contracted partner consignor:

For the purposes of this section, Express One is a controller.

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
1	Natural person representing the contracted partner	Collected from the natural person representing the contracted party: name; phone number; fax number and email address	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act]	Preparation and performance of the contract concluded with contractual partners for postal services, accounting, verification and ex-post control of the performance, and provision of data to the supervisory authority, and liaising.
2	Natural person consignee	Collected and transmitted by the contracted partner (as other data controller): name, residential address, delivery address, place of birth; date of birth; mother's maiden name; tax identification number; phone number; fax number; email address	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal	Preparation and performance of the postal services contract, settlement of accounts with, certification and ex-post control of its performance, provision of data to the supervisory authority, and liaising.

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
			obligations: Article 54(1) of the Postal Services Act]	
		Collected and transmitted by the contracted partner (as other data controller): email address	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
		Collected from the consignee: signature and description, letter and numerical code of the document proving identity.	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act and Article 22(5)(a) and (b) of the Postal Services Decree]	Fulfilment of the legal obligation relating to the contract for postal services, proof of fulfilment of the contract, and compliance with the legal obligation.
		Result of the satisfaction survey made with the consignee and the waybill number.	Article 6(1)(a) of the GDPR (the data subject's consent)	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
3	Natural person	Collected and transmitted by the contracted partner (as other	Article 6(1) (b) of the GDPR	Preparation and performance of

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
	representing the consignee (or other person entitled to receive the consignment)	data controller): name, residential address and phone number	(data processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 54(1) of the Postal Services Act]	the postal services contract, accounting, verification and ex-post control of the performance, provision of data to the supervisory authority, and liaising.
		Collected and transmitted by the contracted partner (as other data controller): email address	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
		Collected from the natural person representing the consignee: signature and description, letter and numerical code of the document proving identity.	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Articles 41(10) and 54(1) of the Postal Services Act]	Fulfilment of the legal obligation relating to the contract for postal services, proof of fulfilment of the contract, and compliance with the legal obligation.

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
			Act and Article 22(5)(a) and (b) of the Postal Services Decree]	
		Result of the natural person the satisfaction survey made with the natural person representing the consignee and the waybill number.	Article 6 (1)(a) of the GDPR (the data subject's consent)	By dispatching a questionnaire end date of validation via email to assert Express One's legitimate interests (quality assurance and monitoring/ improving the quality of its services).
4	Witness	Collected from the witness: his/her capacity; name, age, signature; data relating to proof of identity	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) [legislation containing legal obligations: Article 26(1) of the Postal Services Decree]	Proof of delivery of a registered consignment to an consignee who is illiterate, does not know Latin characters or is otherwise unable to write, and proof of the consignee's eligibility.
5	Legal representative or guardian	Collected from the legal representative: data required for personal identification; signature; Collected from a guardian: non-appealable official decision; official identity card or official certificate and signature	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND Article 6(1)(c) of the GDPR (required for the performance of	Proof of delivery of a personal delivery request to a natural person who is incapacitated or subject to guardianship that excludes his or her capacity to act.

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
			a legal obligation) [legislation containing legal obligations: Article 26(1) of the Postal Services Decree]	

3. DELIVERY ABROAD FOR CONTRACTED AND AD HOC CUSTOMERS, DELIVERY BY COURIER ("EURODIS")

In the case of the provision of courier services across the borders of Hungary, Express One will process the data indicated in Clause a, with the exception that, subject to limited exceptions, data collected from the consignee or from a natural person representing the consignee will not be processed.

4. OTHER POSTAL SERVICES NOT REPLACING THE UNIVERSAL SERVICE

4.1 Description of the service

Other postal services that do not replace the universal service provided by Express One are defined in Clauses 1.1 and 7.1 of the GTC.

4.1.1. For ad hoc consignors

See: the applicable provisions set out in Clause 1.1.1.

4.1.2. For a contracted partner consignor

See: the applicable provisions set out in Clause 1.1.2.

5. SHIPPING SERVICE

5.1 Description of the service

Shipping service is a service provided exclusively to companies that are the contractual partners of Express One, whereby Express One delivers or attempts to deliver the consignment dispatched and handed over to Express One by the consignor company to the consignee (consignee) or the person entitled to receive it, as specified by the consignor company, subject to the conditions set out in the GTC and in the shipping contract concluded between the parties. Further provisions on shipping are set out in Articles 6:257 to 6:271 of the Civil Code.

For the purposes of this section, Express One is a controller.

	Data subject	Processed personal data of the data subject and its source	Legal basis for data processing	Purpose of data processing
1	Natural person representing the contracting party	Collected from the natural person representing the contracting party: name; phone number; fax number and email address.	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND GDPR, Article 6(1) (f) (required)	Preparation and performance of the shipping services contract, settlement of accounts with, certification and ex-post control of its performance, liaising.

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
			for asserting the legitimate interests of Express One)	
2	Natural person consignee	Collected and transmitted by the contractual partner (as other data controller): name, residential address, delivery address, place of birth; date of birth; mother's maiden name; tax identification number; phone number; fax number; email address	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND/OR Article 6(1)(c) of the GDPR (required for the performance of a legal obligation AND) Article 6(1)(f) of the GDPR (for asserting Express One's legitimate interests).	Preparation and performance of the shipping services contract, settlement of accounts with, certification and ex-post control of its performance, liaising.
		Collected and transmitted by the contractual partner: email address	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
		Collected from the consignee: signature	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	Required for asserting Express One's legitimate interests (proof of contract performance).
		Result of the satisfaction survey made with the consignee and the waybill number.	Article 6(1)(a) of the GDPR (the data subject's consent)	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
				quality of its services).
3	Natural person representing the consignee	Collected and transmitted by the contractual partner: name and phone number	Article 6(1)(b) of the GDPR (processing is required for the performance of the contract) AND/OR Article 6(1)(f) of the GDPR (for asserting Express One's legitimate interests).	Preparation and performance of the shipping services contract, settlement of accounts with, certification and ex-post control of its performance and liaising.
		Collected and transmitted by the contractual partner: email address	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).
		Collected from the natural person representing the consignee: signature	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	Required for asserting Express One's legitimate interests (proof of contract performance).
		Result of the satisfaction survey made with the natural person representing the consignee and the waybill number.	Article 6(1)(a) of the GDPR (the data subject's consent)	By dispatching a questionnaire via email to assert Express One's legitimate interests (quality assurance and monitoring/improving the quality of its services).

6. DATA PROCESSING RELATED TO OTHER ACTIVITIES

Where Express One also performs a processing activity not covered by this Privacy Notice, at the time the personal data is obtained, Express One will provide the information required by the applicable legislation.

7. ADDITIONAL INFORMATION RELATING TO THE PROCESSING DESCRIBED IN CLAUSES 1 TO 5

7.1. Using a data processor

Express One uses/may use a subcontractor for the performance of courier service contracts, contracts for delivery to parcel lockers and transport service contracts.

Where a subcontractor is used, personal data relating to the consignee and the person authorised to receive the data will be transmitted to the subcontractor responsible for the territory in question on the basis of the data processing arrangements between Express One and the subcontractor.

In relation to the performance of the contract, the subcontractor should collect the signatures of the consignee or the person authorised to receive the consignment, and the witness, or the legal representative, and transmit this personal data to Express One. In the event of delivery of a registered consignment at a point of delivery in accordance with the Postal Act, in addition to the signature, the subcontractor should also request the name, letter code and number of the document proving the identity of the consignee or other authorised consignee.

In addition to the subcontractors involved in the performance of the contracts, Express One may also transmit personal data to additional data processors (e.g. data processors providing accounting services, etc.) to the extent necessary for the purpose of fulfilling its obligations under applicable legislation. Such transmissions take place, inter alia, in the case of transfers to a data processor used for the preparation and issue of EXO invoices for the services.

In addition to the above, in the event of services provided across the borders of Hungary, the data necessary for the fulfilment of the service will be transmitted to Express One's contractual partners (members of the EURODIS network).

7.2. Data transmission

The authorised and competent authorities, bodies, etc. may contact Express One in accordance with the applicable legislation and request it to transmit personal data processed by Express One. In such a case, Express One is obliged to comply with the request of the requesting authority, body, etc. in accordance with the law and to transmit the requested personal data requested to the authority, body, etc. in accordance with and to the extent specified in the request. Otherwise, personal data will not be transmitted.

As a postal service provider, Express One may forward the data related to the performance of the postal service and those that come to its knowledge during the performance of the postal service to a data manager or data processor in a third country exclusively for the purpose of the performance of the postal service and the confirmation, financial settlement and ex post inspection of the performance. [Article 54 (4) of the Postal Services Act].

Express One does not otherwise transmit personal data to third countries or international organisations.

7.3. Retention period for personal data

The duration of the storage of personal data is determined taking into account the following criteria:

- a) **Personal data relating to the sender and to the natural person acting on behalf of the sender:** documents containing personal data within the scope of Article 169 (2) of Act C of 2000 on Accounting (hereinafter: “**Accounting Act**”) will be retained for 8 years from the date of their creation.

If other legislation provides for a different retention period for Express One, the retention period provided for by the legislation will apply.

Where Express One's legitimate interest [Article 6(1)(f) of the GDPR] would require the retention of personal data for a longer period, the personal data may be retained for as long as the underlying legitimate interest allows.

- b) **Personal data relating to the consignee and to the natural person representing the consignee/person authorised to receive the data:** Documents containing personal data within the scope of Article 169 (2) of the Accounting Act will be retained for 8 years from the date of their creation.

If other legislation provides for a different retention period for Express One, the retention period provided for by the legislation will apply.

Where Express One's legitimate interest [Article 6(1)(f) of the GDPR] would require the retention of personal data for a longer period, the personal data may be retained for as long as the underlying legitimate interest allows.

Personal data relating to satisfaction surveys will be kept for a period justified by and in accordance with EXO's legitimate interest. In the course of assessing this, it also takes into account, among other things, the date of submitting the satisfaction survey and the time required for processing it.

7.4. Consequences of failure to provide data

The provision of the personal data listed for each processing is a prerequisite for the performance or conclusion of the relevant contract. If the specified personal data are not provided, the contract will not be concluded or will not be performed.

B. OTHER DATA PROCESSING

1. DAMAGE MANAGEMENT

Express One will handle and adjudicate any claims for damages in accordance with applicable legislation and the GTC.

For the purposes of this section, Express One is a controller.

	Data subject	Personal data processed in relation to the data subject and their source	Legal basis for data processing	Purpose of data processing
1	The consignor who enforces the claim	<ul style="list-style-type: none"> Collected directly from the data subject: name; residential address; e-mail address; phone number; Based on the logbook: name of consignor, name of consignee; place of recording; waybill number; consignment contents; consignment status information; signature 	<p>Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) Article 44-52 of the Postal Services Act</p> <p>AND</p> <p>Article 6(1)(f) of the GDPR (Express One's legitimate interests).</p>	Asserting the rights of Express One and the person entitled to compensation, fulfilling Express One's obligations based on law, gathering evidence that may be used in a dispute
2	The consignee claiming the damage or the authorised representative of the consignee	<ul style="list-style-type: none"> Collected directly from the data subject: name; residential address; e-mail address; phone number; Based on the logbook: name of consignor, name of consignee; place of recording; waybill number; consignment contents; consignment status information; signature 	<p>Article 6(1)(c) of the GDPR (required for the performance of a legal obligation) Article 44-52 of the Postal Services Act</p> <p>AND</p> <p>Article 6(1)(f) of the GDPR (Express One's legitimate interests).</p>	Asserting the rights of Express One and the person entitled to compensation, fulfilling Express One's obligations based on law, gathering evidence that may be used in a dispute

2.1. Processor: the use of a data processor in relation to the data processing activities defined in this point. For the purposes of this Clause, Express One's data processors are its subcontractors contracted for the delivery of the consignment and recorded in the logbook during the delivery of the consignment. For more information about them, see Clause 7.1.

2.2. Data transmission: The authorised and competent authorities, bodies, etc. may contact Express One in accordance with the applicable legislation and request it to transmit personal data processed by Express One. In such a case, Express One is obliged to comply with the request of the requesting authority, body, etc. in accordance with the law and to transmit the requested personal data requested to the authority, body, etc. in accordance with and to the extent specified in the request.

If the damage is also related to Express One's insurance contracts, the data relating to the damage and its notification will be transmitted to the competent insurer acting as a data controller.

Otherwise, the personal data will be transmitted to the competent authority or judicial body in the course of any enforcement proceedings.

2.3. Retention period for personal data: The retention period for damage reports and the documents related to their processing is the period specified in the applicable legislation or, if necessary to assert Express One's legitimate interest, the period justified by the legitimate interest.

2.4. Consequences of failure to provide data: Express One is unable to process a notice made by an unidentified person.

2. CLAIMS MANAGEMENT

Express One may process the following personal data in relation to claims arising from contracts with Express One.

For the purposes of this section, Express One is a data controller.

	Data subject	Processed personal data of the data subject and its source	Legal basis for data processing	Purpose of data processing
	The consignor or consignee	Collected directly from the data subject or a third person: name; residential address; e-mail address; phone number;	Article 6(1)(f) of the GDPR (Express One's legitimate interests).	Collection of evidence that may be used while asserting the rights of Express One and in a dispute.

3.1. Processor: the use of a data processor may be required in relation to the processing of claims. In particular, the legal representative appointed by Express One in relation to the case may be a data processor for the purpose of claims management.

3.2. Data transmission: The authorised and competent authorities, bodies, etc. may contact Express One in accordance with the applicable legislation and request it to transmit personal data processed by Express One. In such a case, Express One is obliged to comply with the request of the requesting authority, body, etc. in accordance with the law and to transmit the requested personal data requested to the authority, body, etc. in accordance with and to the extent specified in the request.

In other respects, personal data will be transmitted to the competent authorities, courts, bodies and legal representative in the course of any legal proceedings.

3.3. Retention period for personal data: The retention period for documents relating to the management of a claim will be commensurate with the time required to

enforce Express One's legitimate interest, but will not normally exceed 5 years from the date when the underlying contract terminates or the claim becomes due.

Consequences of failure to provide data: In the event that Express One does not receive any data required for the processing of a claim, it will seek other lawful means to pursue its claims.

II. ADDITIONAL PROVISIONS

1. DATA SECURITY

Express One stores the personal data it processes as follows:

- electronically stored personal data/documents are stored on Express One's IT systems.
- the personal data/documents stored on paper are stored in areas owned by Express One or by a company that is Express One's data processor and specifically provides document storage services [company name: Iron Mountain Magyarország Kft.; registered office: H-1093 Budapest, Czuczor utca 10. IV. és V. emelet; company registration number: 01-09-364901].

In relation to the processing and storage of data, Express One and its data processor will implement appropriate technical and organisational measures to ensure an adequate level of data security, including:

- saving data at appropriate intervals and tracking changes;
- access to personal data (computer network) stored by Express One is restricted to authorised persons for the sole purpose of the processing and to the limited extent related to their work;
- placing the technical device(s) used for storing personal data in a locked room and physically protecting it;
- the minimisation of the export of data from protected areas;
- sealed (delivered) shipment data is available for 45 days, then it is archived and only those users can have access to it who need it for their work;
- protecting the IT system with an authorisation system and hardware and software solutions (including firewall, antivirus, etc.) that respect the principles set out in EXO's user policy.

2. DATA SUBJECTS' RIGHTS IN RELATION TO DATA PROCESSING

- I. In relation to Express One's processing of his or her personal data, the data subject is entitled to:

- a. **receive information** from the controller [Articles 13 and 14 of the GDPR] (see Clause 2.1. of this Privacy Notice);
 - b. **withdraw his or her consent** (if applicable) [Article 7(3) of the GDPR] (see Clause 2.2 of this Privacy Notice);
 - c. **have access to his or her personal data** [Article 15 of the GDPR] (see Clause 2.3 of this Privacy Notice);
 - d. **request rectification of his or her personal data** [Article 16 of the GDPR] (see Clause 2.4 of this Privacy Notice);
 - e. **request the erasure of his or her personal data** [Article 17 of the GDPR] (see Clause 2.5 of this Privacy Notice);
 - f. **request the restriction of the processing of his or her personal data** [Article 18 of the GDPR] (see Clause 2.6 of this Privacy Notice);
 - g. exercise the **right to data portability** in relation to his or her personal data [Article 20 of the GDPR] (see Clause 2.7 of this Privacy Notice);
 - h. **object to the processing of his or her personal data** [Article 21 of the GDPR] (see Clause 2.8 of this Privacy Notice);
 - i. **complain** to a supervisory authority about data processing [Article 77 of the GDPR] (see Clause 2.9.1 of this Privacy Notice);
 - j. **seek judicial redress** [Article 79 of the GDPR] (see Clause 2.9.2 of this Privacy Notice);
 - k. **claim damages** [Article 82 of the GDPR] (see Clause 2.10 of this Privacy Notice).
- II. While exercising his or her rights, the data subject must provide Express One with sufficient information to enable Express One to comply with its obligations set out in the applicable legislation in relation to the exercise of the data subject's rights. In this context, the data subject should specify, among other things, the right he or she wishes to exercise and, depending on the right he or she wishes to exercise, any additional information required for the exercise of that right (e.g. in the case of a request for rectification of his or her data, the data to be rectified).

The contact details for receiving the data subject's requests under this point are as follows:

- email address: adatvedelem@expressone.hu
- Phone: +36-70-866 8733
- Address: H-1239 Budapest, Európa utca 12.
- postal address: H-1239 Budapest, Európa utca 12.

2.1 Right to information

The controller takes appropriate measures to provide the data subject with all the information referred to in Articles 13 and 14 and all the information referred to in Articles 15 to 22 and Article 34 concerning the processing of personal data in a concise, transparent, intelligible and easily accessible form, in clear and plain language, in particular in the case of any information addressed to children. Such information must be provided in writing or by other means, including electronic means, where appropriate. Oral information may also be given at the request of the data subject, provided that the identity of the data subject has been verified by other means.

2.2 Right to withdraw consent

If a processing operation is based on the data subject's consent, the data subject is entitled to withdraw his or her consent at any time. However, the withdrawal of consent does not affect the lawfulness of the processing performed prior to withdrawal, based on consent.

2.3 Right of access

The data subject has the right to obtain from Express One (as controller) confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information listed in Article 15(1) of the GDPR:

Where personal data are transferred to a third country or to an international organisation, the data subject has the right to be informed of the appropriate safeguards relating to such transfer [Article 15(2) of the GDPR].

Express One provides the data subject with a copy of the personal data processed upon request. For additional copies requested by the data subject, Express One may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form [Article 15(3) of the GDPR]. The right to obtain a copy may not adversely affect the rights and freedoms of others [Article 15(4) of the GDPR].

2.4 Right to rectification

The data subject has the right to request Express One to rectify any inaccurate personal data concerning him or her without undue delay. In addition, taking into account the purposes of the processing, the data subject is entitled to have incomplete personal data completed, including by means of providing a supplementary statement.

Express One communicates any rectification of personal data carried out in accordance with Article 16 to each consignee to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. Express One informs the data subject about those consignees if the data subject requests it.

2.5 Right to erasure

The data subject has the right to obtain from Express One the erasure of personal data concerning him or her without undue delay. Express One, on the other hand, is obliged to erase personal data of the data subject without undue delay if one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws his or her consent that forms the basis of processing according to Article 6(1)(a) of the GDPR or Article 9(2)(a), and there is no other legal ground for processing;
- c) the data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR;
- d) the personal data have been unlawfully processed;
- e) personal data must be erased in order to comply with a legal obligation applicable to the data controller under Union or Member State law to which Express One is subject;
- f) the personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

Express One is not obliged to erase personal data if 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 Express One is subject;
- c) in the public interest in the field of public health;
- d) 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 such processing; or
- e) for the establishment, exercise or defence of legal claims.

Express One communicates any erasure of personal data carried out in accordance with Article 17(1) to each consignee to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. Express One informs the data subject about those consignees if the data subject requests it.

2.6 Right to the restriction of processing

If one of the following conditions is met, the data subject has the right to have Express One restrict the processing:

- a) the data subject contests the accuracy of the personal data. In this case, the restriction applies for the period of time required to allow the data controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

- c) Express One 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;
- d) the data subject has objected to the processing pursuant to Article 21(1) of the GDPR. In such a case, the restriction applies for the period until it is established whether the legitimate grounds of the controller prevail over the legitimate grounds of the data subject.

Where processing has been restricted as above, such personal data may, with the exception of storage, only be processed with the data subject's 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. Express One informs the data subject (who has requested and has been granted restriction of processing) before lifting the restriction of processing.

Express One communicates all restrictions of processing personal data carried out in accordance with Article 18 to each consignee to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. Express One informs the data subject about those consignees if the data subject requests it.

2.7 Right to data portability

The data subject is entitled to receive the personal data concerning him or her, which he or she has provided to a controller (e.g. Express One acting as controller), in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (e.g. Express One acting as controller), where:

- a) the processing is based on consent or a contract; and
- b) the processing is carried out by automated means.

In exercising his or her right to data portability pursuant to this clause, the data subject is entitled to request the direct transfer of personal data between controllers, where technically feasible.

The exercise of this right is without prejudice to the right to erasure [Article 17 of the GDPR] and may not adversely affect the rights and freedoms of others.

2.8 Right to object

The data subject is entitled to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data based on Article 6(1)(f) of the GDPR (processing based on legitimate interests), including profiling based on that same provision.

In that case, Express One may no longer process the personal data, unless Express One demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject is entitled to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. In such a case, the personal data may no longer be processed for such purposes.

2.9 Available legal remedies

Express One informs the data subject of the action it has taken regarding the request within 1 (one) month of receipt of the requests detailed above.

If no action is taken, Express One informs the data subject without delay and at the latest within 1 (one) month of receipt of the request of the reasons for the lack of action and of the data subject's right to (i) lodge a complaint with a supervisory authority and (ii) seek judicial remedy.

2.9.1 Right to complain

If a data subject considers that the processing of personal data relating to him or her infringes the GDPR, he or she has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement.

In Hungary, the supervisory authority is:

Name	National Authority for Data Protection and Freedom of Information
Postal address	H-1530 Budapest, POB: 5
Address	H-1125 Budapest, Szilágyi Erzsébet fasor 22/C
Phone	(+36) 1 391-1400
Fax	(+36) 1 391-1410

Email	ugyfelszolgalat@naih.hu
URL	http://naih.hu

2.9.2 Right to judicial redress

If in the data subject's opinion his or her rights under the GDPR have been infringed as a result of the processing of his or her personal data in a way that does not comply with the GDPR, the data subject is entitled to take legal action.

In such a case, proceedings against Express One as data controller may be brought before the courts of the Member State where Express One is established, i.e. Hungary, or, at the choice of the data subject, before the courts of the Member State where the data subject has his or her habitual residence.

2.10 Right to damages

If the data subject has suffered financial or non-financial loss as a result of a breach of the GDPR, he or she is entitled to receive compensation from the data controller or data processor for the loss suffered.

Each data controller involved in the processing shall be liable for any damage caused by processing in breach of the GDPR.

A data processor is only liable for any damage caused by the processing if it has failed to comply with the obligations expressly imposed on data processors by the GDPR or if it has disregarded or acted contrary to lawful instructions from the data controller.

The data controller or data processor is exempt from liability for damages if he or she proves that it is not in any way responsible for the event giving rise to the damage.

Where more than one controller or processor is involved in the same processing and their liability can be established, each controller or processor is jointly and severally liable for the total damage.

For the jurisdiction of courts, see 2.9.2.