

**Privacy Notice**  
**on processing activities of Polymer Customer Service MOL (“Customer Service”) and Polymer Technical Service MOL (“Technical Service”) of MOL Nyrt (“Company”) and MOL Petrochemicals Company Limited by Shares (“MOL Petrochemicals”)**

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
<p><b>Data processing relating to contract proposals or receipt of requests for proposals by the Controllers</b></p> <p>This processing operation involves processing of the contact details of contacts, representatives and employees of the entities receiving proposals from, as well as partners sending requests for proposals to the Controllers.</p> <p>Filing system: [SAP, CRM].</p>	<p>GDPR Art. 6 (1.b) - if order placement is necessary for the performance of the contract concluded with the Customer who is a natural person (individual entrepreneur) or in order to take steps at the request of the data subject prior to entering into the contract;</p> <p>GDPR Art. 6 (1.f) (legitimate interests pursued by the Controllers and the contracting entity/partner receiving their proposal).</p> <p>Legitimate interest: assessment of proposal/request for</p>	<p>Name, position, email address, phone number of the relevant contact on contractual matters, representative or employee acting as representative; in case of persons authorised to sign for the company, including the specimen signature, name, registered seat, bank account and tax identification number of the organisation (company) represented.</p> <p>Source of data: the entity receiving the proposal from the Controllers and the contracting entity.</p>	<p>Concerning the enforcement of civil claims and fulfilment of obligations: <b>5 years</b> (Art. 6.22 (1) of Act V of 2013 on the Civil Code (“CC”)) from the date of termination of the contractual relationship if a contract is concluded based on the proposal; from the date of receipt of the contract proposal or the date of express rejection of the proposal in other cases; from the date of last communication in the absence of proposal (for example, no proposal is submitted based on</p>	<p>The Company and MOL Petrochemicals are the joint controllers.</p>	<p><b>MOL IT &amp; Digital GBS Kft.</b>          (registered seat: H-1117 Budapest, Galvani út 44, email address: ITU@mol.hu, company reg. number: 01-09-195458) – Operation of SAP, CRM systems.</p> <p><b>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet</b>          – recording data of potential Customers (clients) in the CRM system, processing payment records as part of the order placement process  <u>Registered seat:</u> H-2724 Újlengyel, Kossuth utca 138  <u>CRN:</u> 13-02-051119  <u>Phone number:</u> +36 1 217 6426; +36 1 323 2133  <u>email address:</u> info@melodiak.hu</p>

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	proposals received from partner, managing proposals, successful and effective conduct of contractual negotiations, preparation of relevant contracts.		the request for proposals), given that civil claims shall lapse after 5 years.		
<b>Credit rating</b>  Filing system: CRM, SAP	GDPR Art. 6 (1.f) (legitimate interests pursued by the Company).  Legitimate interest: checking credit lines of potential contractual partners and bidders to conclude contracts with creditworthy partners.	Contracting partner data and related contact details accessed during the credit line assessment.  Source of data: credit rating partners of MOL Petrochemicals (credit insurer, company information provider, public database and internal data).	The credit rating provided by MOL Petrochemicals' credit rating partner is valid for 60 days.  Concerning the enforcement of civil claims and fulfilment of obligations: <b>5 years</b> (CC Art. 6.22 (1)) from the date of termination of the contractual relationship if a contract is concluded based on credit line assessment; from the date of credit line assessment, given that civil claims shall lapse after 5 years.	The Company and MOL Petrochemicals are the joint controllers.	<b>MOL IT &amp; Digital GBS Kft.</b> (registered seat: H-1117 Budapest, Galvani út 44., email address: ITU@mol.hu, company reg. number: 01-09-195458) – Operation of SAP, CRM systems.  <b>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet</b> – recording data of potential Customers (clients) in the CRM system, processing payment records as part of the order placement process <u>Registered seat:</u> H-2724 Újlengyel, Kossuth utca 138 <u>CRN:</u> 13-02-051119 <u>Phone number:</u> +36 1 217 6426; +36 1 323 2133 <u>email address:</u> info@melodiak.hu

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			<p>If processing of these data is necessary for compliance with tax obligations of MOL Petrochemicals, data shall be processed for <b>5 years</b> from the last day of the calendar year when tax return, data supply or reporting should be submitted or in the absence of tax return, data supply or reporting, the tax should have been paid (Art. 78 (3), 202 (1)).</p> <p>If these data are necessary for compliance with accounting obligations of MOL Petrochemicals, in order to retain accounting records, these shall be retained for <b>8 years</b> (AA Art. 168-169)</p>		<p><b>Atradius Crédito y Caución S.A. de Seguros y Reaseguros Magyarországi Fióktelepe</b> – credit insurance services  <u>Registered seat:</u> H-1117 Budapest Fehérvári út 50-52.  <u>CRN:</u> 01-17-000324  <u>Phone number:</u> + 36 1 382 7590  <u>email address:</u> info-hu@atradius.com</p>

Designation and purpose of data processing	Legal basis of data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of data transfer	Data processor and processing activity
<p><b>Conclusion of wholesale contracts signed with MOL Petrochemicals partners, performance of contracts</b></p> <p>Filing system: SAP, CRM.</p>	<p>GDPR Art. 6 (1.b) (performance of contracts in effect concluded by MOL Petrochemicals and its contractual partners).</p> <p>Conclusion and performance of contracts, alignment of business activities of the parties, exercising contractual rights and fulfilment of contractual obligations.</p> <p>In case of parties who are legal entities: GDPR Art. 6 (1.f) (legitimate interests pursued by the Controllers and the contracting entity/partner receiving their proposal).</p> <p>Legitimate interest: Conclusion and performance of contracts, alignment of business activities of the parties, exercising contractual rights and fulfilment of</p>	<p>Name, position, email address, phone number of the relevant contact, representative, employee acting as representative, name, registered seat, bank account and tax identification number of the organisation (company) represented, other details related to performance of the contract.</p> <p>Name, position, email address, phone number, fax number of the contact, representative, employee acting as representative of the customer who is a customer group member, name, registered seat, bank account and tax identification number of the organisation (company) represented, as well as other details related to performance</p>	<p>Concerning the enforcement of civil claims and fulfilment of obligations: <b>5 years</b> (CC Art. 6.22 (1)) from the date of termination of the contractual relationship if a contract is concluded based on credit line assessment; from the date of credit line assessment, given that civil claims shall lapse after 5 years.</p> <p>If processing of these data is necessary for compliance with tax obligations of MOL Petrochemicals, data shall be processed for <b>5 years</b> from the last day of the calendar year when tax return, data supply or reporting should be submitted or in the absence of tax return,</p>	<p>The Company and MOL Petrochemicals are the joint controllers.</p>	<p><b>MOL Nyrt Domestic Polymer Sales MOL, Group Petrochemical Sales</b></p> <p><b>MOL-Austria Handels GmbH, TIFON d.o.o., MOL Germany GmbH, MOL Italia S.r.l, SLOVNAFT POLSKA S.A., SC. MOL Romania PP SRL, MOL Ukraine LLC, SLOVNAFT, a.s.</b></p> <p>Paper-based contract electronic records, contract recorded in electronic format.</p> <p><b>MOL IT &amp; Digital GBS Kft.</b> (registered seat: H-1117 Budapest, Galvani út 44., email address: ITU@mol.hu, CRN: 01-09- 195458) – Operation of SAP, CRM systems.</p> <p><b>MOL GBS Magyarország Kft.</b>(registered seat: 1039 Budapest, Szent István utca 14., email address: gbs@mol.hu CRN: 01-09- 190591</p>

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	contractual obligations.	of the contract.  Source of data: contractual partner of MOL Petrochemicals. In case of customers who are customer group members: the representative of the customer group.	data supply or reporting, the tax should have been paid (Art. 78 (3), 202 (1)).  If these data are necessary for compliance with accounting obligations of MOL Petrochemicals, in order to retain accounting records, these shall be retained for <b>8 years</b> (AA Art. 168-169)		Book-keeping, audit, provision of tax advice, operation of MOL Internal Mail Processing Services (handling incoming and outgoing postal items).  <b>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet</b> – recording data of potential Customers (clients) in the CRM system, processing payment records as part of the order placement process <u>Registered seat:</u> H-2724 Újlengyel, Kossuth utca 136 <u>CRN:</u> 13-02-051119 <u>Phone number:</u> +36 1 217 6426; +36 1 323 2133 <u>email address:</u> info@melodiak.hu
<b>Claims management, debt collection</b>  <u>Filing system:</u> SAP, E-Collect, records and registers of external debt collectors	GDPR Art. 6 (1.f) (legitimate interests pursued by MOL Petrochemicals and the organisation represented by the person who is making an inquiry). Legitimate interest: management of debts	Name, position, email address, phone number of the relevant contact on contractual matters, representative or employee acting as representative; name, registered seat, of the organisation (company)	Concerning the enforcement of civil claims and fulfilment of obligations: 5 years (CC Art. 6.22 (1)) from the date of termination of the contractual relationship	The Company and MOL Petrochemicals are the joint controllers.	<b>MOL GBS Magyarország Kft.</b> ( Data are recorded in SAP and E-collect. Data are recorded in both paper-based and electronic formats.

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	owed to contractual partners within own competence, and/or with the involvement of external debt collectors, lawyers	represented. Source of data: the Customer	established with the Customer, given that civil claims shall lapse after 5 years. If processing of these data is necessary for compliance with tax obligations of MOL Petrochemicals, data shall be processed for <b>5 years</b> from the last day of the calendar year when tax return, data supply or reporting should be submitted or in the absence of tax return, data supply or reporting, the tax should have been paid (Art. 78 (3), 202 (1)). If these data are necessary for compliance with accounting obligations of MOL Petrochemicals, in order to retain accounting records, these shall be retained		<b>Atradius Collections B. V. Magyarországi Fióktelepe</b> – debt collection services <u>Registered seat:</u> H-1117 Budapest Fehérvári út 50-52 <u>CRN:</u> 01-17-000480 Phone number: +36 1 382 7598 <u>email address:</u> <a href="mailto:info.hu@atradius.com">info.hu@atradius.com</a> <b>MOL IT &amp; Digital GBS Kft.</b> (registered seat: H-1117 Budapest, Galvani út 44., email address: ITU@mol.hu, CRN: 01-09- 195458) – Operation of SAP, CRM systems.

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			for <b>8 years</b> (AA Art. 168-169)		
<b>Reference to the Customer</b>  MOL Petrochemicals shall be entitled to list this Contract and its co-operation established with the Customer as reference, if expressly requested to do so by a third party within the framework of bidding, public procurement procedure or during contractual negotiations. This requires that the Company is authorised to do so under the contract concluded with the Customer.	GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by MOL Petrochemicals).  Legitimate interests pursued by MOL Petrochemicals: the Company's business interests, tendering, public procurement procedure or contractual negotiations as part of successful procedure.	Name and position of the Customer's representative on contractual matters.	The duration required by the relevant tendering, public procurement procedure or contractual negotiations.	The Company and MOL Petrochemicals are the joint controllers.	<b>None.</b>
<b>Communication, responding answering questions, data reconciliation, complaints management (excluding consumer complaints and product defect reports) in printed form or via electronic mail exchange (email) relating to customers ("Customer", "Customers") and data</b>	GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by the Controllers and - in case of communication with the Customer who is a legal person -, the Customer). Legitimate interests: successful communication	Data/company data included in inquiries made by the Customer or other data subject, in printed form or electronic exchange of messages, including data that appear in complaints (for example, reason and type of complaint), (company)	The Company shall retain data for <b>5 years</b> (pursuant to Art. 6.22 (1) of Act V of 2013 on the Civil Code ("CC")) after the termination of the contract concluded with the Customer, or - in the absence of such contract -, from the date of	The Company and MOL Petrochemicals are the joint controllers.	<b>MOL GBS Magyarország Kft.</b> – handling postal items sent to the Controllers (address: 1039 Budapest, Szent István utca 14., email address: gbs@mol.hu.  <b>Meló-Diák Universitas Szolgáltató Iskolaszövetkezet</b> – recording data of potential

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<b>subjects who are not Customers</b>  Filing system: CRM system	with the Customer or other data subject, answering questions, data reconciliation, complaints management.  GDPR Art. 6 (1.b) - if communication, answering questions, data reconciliation, complaints management is necessary for the performance of the contract concluded with the Customer who is a natural person (individual entrepreneur) or in order to take steps at the request of the data subject prior to entering into the contract.	name and contact details of the Customer or other data subject (for example, individual entrepreneur submitting a bid, but not contracted), as well as the name and position of the contact of the Customer who is a legal person (for proper addressing), including phone number, fax number, email address and additional data necessary for contractual performance (for example: dates of availability relating to performance).  Source of data: the Customer or other data subject.	receipt of the contract proposal or the date of express rejection of the proposal, or from the date of the last communication in the absence of proposal (for example, no proposal is submitted based on the request for proposals), or in case of inquiry or complaint by other data subject, with regard to the enforcement of any civil claims of the Controllers or defence against any civil claims of the data subjects.		Customers (clients) in the CRM system, processing payment records as part of the order placement process <u>Registered seat:</u> H-2724 Újlengyel, Kossuth utca 138. <u>CRN:</u> 13-02-051119 <u>Phone number:</u> +36 1 217 6426; +36 1 323 2133 <u>email address:</u> info@melodiak.hu
<b>Order placement</b>  Orders can be communicated via phone, email.  Filing system: CRM system	GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by MOL Petrochemicals and the client if it is a legal person). Legitimate interest: execution of	Data stated in the client order, such as (company) name, SAP (CRM System) code, address of the client, in case of client who is a legal person, name and position of contact (for	The Company shall retain order placement-related data for <b>5 years</b> (pursuant to CC Art. 6:22) from the date of order placement for the enforcement of any MOL Petrochemicals	The Company and MOL Petrochemicals are the joint controllers.	<b>MOL GBS Magyarország Kft.</b> — handling postal items sent to the Controllers (address: H-1039 Budapest, Szent István utca 14. email address: gbs@mol.hu.  <b>Meló-Diák                      Universitas</b>



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	<p>orders, strengthening the business relations between MOL Petrochemicals and the client.</p> <p>GDPR Art. 6 (1.b) - if order placement is necessary for the performance of the contract concluded with the Customer who is a natural person (individual entrepreneur) or in order to take steps at the request of the data subject prior to entering into the contract;</p>	<p>proper addressing), phone number, fax number and email address, the type and volume of product(s) ordered, the client's bank account number and ship-to address.</p> <p>Source of data: the client.</p>	claims and defence against any civil claims of data subjects.		<p><b>Szolgáltató Iskolaszövetkezet</b> – recording data of potential Customers (clients) in the CRM system, processing payment records as part of the order placement process (address: H-2724 Újlengyel, Kossuth utca 136, email address: info@melodiak.hu).</p> <p><b>MOL GBS Magyarország Kft.</b> (– credit management, billing services (address: H-1039 Budapest, Szent István utca 14., email address: mpk-ar@petrochemicals.mol.hu).</p>
<b>Reconciliation related to releasing credit blocks, financial feasibility assessment of orders</b>	<p>GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by MOL Petrochemicals).</p> <p>Legitimate interest: enforcement of civil claims, protection of business interests of MOL Petrochemicals and its protection against losses.</p>	<p>If the Customer is a natural person (private entrepreneur): bank account number, client name of the Customer, order details and feasibility.</p> <p>If the Customer is a legal person: name and position of the Customer's contact (for proper addressing), phone number, fax</p>	<b>5 years</b> (pursuant to CC Art. 6:22) from the date of termination of the civil law contract concluded by MOL Petrochemicals and the Customer/completion date of the test for the enforcement of any MOL Petrochemicals claims and defence against any civil claims of data subjects.	The Company and MOL Petrochemicals are the joint controllers.	<b>MOL GBS Magyarország Kft.</b> (– credit management, billing services (address: H-1039 Budapest, Szent István utca 14., email address: mpk-ar@petrochemicals.mol.hu).

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		<p>number and email address, bank account number, client name of the Customer represented, order details and feasibility.</p> <p>Source of data: the Customer.</p>			
<p><b>Conducting MOL Petrochemicals customer satisfaction surveys</b></p> <p>Customer satisfaction surveys are conducted periodically, but typically once every year by using on-line questionnaires and / or via phone.</p> <p>Detailed arrangements of satisfaction surveys can be found in the regulation governing the satisfaction survey concerned.</p>	<p>GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by MOL Petrochemicals).</p> <p>Legitimate interest: understanding to what extent MOL Petrochemicals Customers are satisfied with MOL Petrochemicals products and services, and complaints management procedures in order to support improvement of MOL Petrochemicals products and services, practicable customisation of the same based on customer</p>	<p>Name and position of the Customer - or if the Customer who is a legal person, its contact -, (for proper addressing), email address, questions about the level of satisfaction of the Customer concerned, comments and answers of the data subject (for example, how services delivered to and products purchased by the Customer could be improved, how the relevant complaints are managed).</p> <p>Source of data: the Customer.</p>	<p>Until completion of summaries and statistics related to product and service quality and complaints management based on customer satisfaction survey findings (as of this date, data are anonymised and could no longer be associated with the Customer concerned or its contact).</p>	<p>The Company and MOL Petrochemicals are the joint controllers.</p>	<p><b>Ipsos Zrt.</b> – conducting customer satisfaction surveys  <u>registered seat</u>: [Budapest H-1139, Pap Károly u. 4-6]  <u>CRN</u>: [01-10-046444]  <u>Phone number</u>: [+36-1 476-7600]  <u>email address</u>:  huinfo@ipsos.com</p>

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	demands, as well as improvement of complaints management practices.				
<p><b>Sending general marketing messages, information materials to Customers via email about news and events related to MOL Petrochemicals, MOL Petrochemicals products and services, invitations to MOL Petrochemicals-related events</b></p> <p>Above general marketing messages and information materials of MOL Petrochemicals contain only information related to products and services offered by, news and events related to MOL Petrochemicals, and do not discuss information concerning third parties, their products or services.</p>	<p>GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by MOL Petrochemicals and the Customer). Legitimate interest: distribution of general marketing messages and information materials of MOL Petrochemicals in order to increase awareness of MOL Petrochemicals MOL Petrochemicals products and services, information about news and events related to MOL Petrochemicals, invitation to events related to MOL Petrochemicals that could be beneficial to the Customer (for example, information on new products, services or events of interest).</p>	<p>Name and position of the Customer - or if the Customer who is a legal person, its contact -, (for proper addressing), and email address.</p> <p>Source of data: Customer Service and Technical Service.</p>	<p>Until termination of the contractual relationship established with the Customer or the right to object is exercised by the data subject – whichever is earlier. In the event of the data subject's objection and the Customers are legal persons, general marketing messages and information materials, invitations are sent to other contacts or other contact details of the Customer as agreed and described in the contract concluded therewith.</p>	<p>The Company and MOL Petrochemicals are the joint controllers.</p>	<p>None.</p>

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<p><b>Prevention, detection and investigation of whistle-blowing related frauds and abuse, investigation of conduct violating MOL Group Code of Ethics and Business Conduct and its Business Partner Code of Ethics</b></p> <p><b>Documents governing prevention and investigation of frauds and abuse, namely MOL Group Code of Ethics and Business Conduct, Business Partner Code of Ethics, Ethics Council Rules of Procedure (“Code of Ethics”) can be found here:</b>  <a href="https://mol.hu/hu/molrol/ethics-es-compliant/ethics/">https://mol.hu/hu/molrol/ethics-es-compliant/ethics/</a></p>	<p>GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by the Company). Legitimate interest: prevention, detection and establishment of personal liability for misconduct jeopardising assets, business secrets, intellectual properties and business reputation of the Company, as well as an appropriate, fear and retribution-free working environment built on mutual trust.</p>	<p>All personal data listed under the purpose of processing above.</p>	<p>Should the investigation find the report unsubstantiated or find that no further measures are required, data related to the specific case shall be deleted within 60 days after closing the investigation concerned.</p> <p>If measures are taken based on investigation findings - including measures taken based on legal procedures or disciplinary action initiated against the whistle-blower -, data related to the specific case shall be handled in the employer’s whistle-blowing system until conclusion of the proceedings initiated based on the report by final decision.</p>	<ul style="list-style-type: none"> <li>- Should the Company initiate an ethics investigation, members of the Ethics Council can access data required to conduct the investigation.</li> <li>- Should the Company initiate procedures to prevent, detect and investigate fraud and misconduct, employees of Regional Security, Group Corporate Security and Internal Audit shall have access to data required to conduct the investigation.</li> </ul> <p>Should the investigation conducted concern other MOL Group Members and the company concerned enforce a legal claim based on investigation</p>	<p><b>MOL IT &amp; Digital GBS Kft.</b>          (registered seat: H-1117 Budapest, Galvani út 44., email address: ITU@mol.hu, CRN: 01-09- 195458) –          Operation of SAP, CRM systems.</p>

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				findings, the HR and Legal organisations of the company concerned, the Group HR and Group Legal organisations shall have access to relevant data.	
<p><b>For the purpose of enforcement of data retention-related legal claims associated with communication and contractual relationship established by Customer Service and Technical Service with the Customers, as well as effective defence in legal disputes or official proceedings</b></p> <p>Pursuant to GDPR Art. 17 (3), this could, for example, be defence against contract-related legal claims potentially initiated by the Customers and in official proceedings.</p>	<p>GDPR Art. 6 (1.f) (data processing is necessary for the legitimate interests pursued by the Controllers). Legitimate interest: enforcement of claims by the Controllers, effective defence against legal claims potentially initiated by the Customers and in official proceedings</p>	<p>Name, address, email address, phone number and other data necessary for defence against legal claims, court or administrative proceedings (for example, data supplied by the data subject as part of the claim concerned, evidence produced and details of the claim enforced against or by the data subject).</p> <p>Source of data: recorded data supplied by the data subject</p>	<p>The Controllers shall retain data for <b>5 years</b> (CC Art. 6.22 (1)) from the date of termination of the contractual relationship if a contract is concluded based on the proposal; from the date of receipt of the contract proposal or the date of express rejection of the proposal in other cases; from the date of last communication in the absence of proposal (for example, no proposal is submitted based on the request for proposals) for the enforcement of any civil claims of the</p>	<p>The Company and MOL Petrochemicals are the joint controllers.</p>	<p><b>MOL GBS Magyarország Kft.</b> – handling postal items sent to the Controllers (address: 1039 Budapest, Szent István utca 14., email address: gbs@mol.hu.</p>

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			<p>Controllers and defence against any civil claims of the data subject.</p> <p>Should processing of the personal data be necessary for defence in court or administrative proceedings initiated by the Customer or other data subject, or for the purposes of the legitimate interests pursued by the Controllers, the Controllers shall, based on their own legitimate interest (GDPR Art. 6 (1.f)), be entitled to process the personal data concerned until completion of the proceedings by a final decision or enforcement of the legitimate interests by other means (for example, out-of-court settlement) and - if retention of the written</p>		

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			or electronic document containing such data is not necessary - make extracts of the document concerned within the scope of data required.		
The management and operation a pallet pooling system (the collection of rented pallets used by MOL Petrolkémia Zrt. In order to reusing) with the support of PRS. .	<p>GDPR Art. 6 (1.b) (performance of contracts in effect concluded by MOL Petrochemicals and its contractual partners).</p> <p>Conclusion and performance of contracts, alignment of business activities of the parties, exercising contractual rights and fulfilment of contractual obligations.</p> <p>I</p>	Details of the respective delivery for Customer [date of delivery, number and type of pallets, name, address, contact person's data (name, e-mail, phone) of Customer, and invoice information: contact person's data (name, e-mail, phone) in financial questions] Source of data: contractual partner of MOL Petrochemicals.	Concerning the enforcement of civil claims and fulfilment of obligations: <b>5 years</b> (CC Art. 6.22 (1)) from the date of termination of the contractual relationship if a contract is concluded based on credit line assessment; from the date of credit line assessment, given that civil claims shall lapse after 5 years.	The Company and MOL Petrochemicals are the joint controllers.	<p>PRS Management B.V. Registered seats Het Schakelplein 14-16, 5651 GR Eindhoven, The Netherlands info@prs-pooling.com +31(0)40 266 2110 Identification number: 10148131</p>

**Name, registered seat, phone number, website (where the privacy notices are accessible) and email address of the Controllers:**

**MOL Nyrt.** (registered seat: H-1117 Budapest, Október huszonharmadika u. 18., phone number: +36-1-211-1000, website: <https://mol.hu/hu/kapcsolat/>, email address: polymersales@mol.hu)

**MOL Petrolkémia Zártkörűen Működő Részvénytársaság** (registered seat: H-3581 Tiszaújváros, TVK Ipartelep TVK Központi Irodaház 2119/3 hrsz., 136. számú épület, phone number: +36-1- 211-1000, website: <https://mol.hu/>, email address: [mpk@mol.hu](mailto:mpk@mol.hu), [pts@mol.hu](mailto:pts@mol.hu), [polymersales@mol.hu](mailto:polymersales@mol.hu))

The above Controllers are considered to be joint controllers, and in this context, they shall jointly determine the purposes and means of the processing and be liable for the processing. The Controllers have this joint Privacy Notice. The data subjects may contact the Company or MOL Petrochemicals to exercise their rights, and the data subjects may exercise their rights against both the Company and MOL Petrochemicals.

**Contact person(s) of the Controllers:**

**MOL Nyrt** - email address: [polymersales@mol.hu](mailto:polymersales@mol.hu)

**MOL Petrolkémia Zártkörűen Működő Részvénytársaság** – [mpk@mol.hu](mailto:mpk@mol.hu), [pts@mol.hu](mailto:pts@mol.hu), [polymersales@mol.hu](mailto:polymersales@mol.hu)

**Name and contact details of data protection officer(s) of the Controllers:**

**MOL Nyrt** - email address: [dpo@mol.hu](mailto:dpo@mol.hu)

**MOL Petrolkémia Zártkörűen Működő Részvénytársaság** – email address: [dpo@mol.hu](mailto:dpo@mol.hu)

**Persons at the Controllers who are authorised to access data:**

- **Communication, responding answering questions, data reconciliation, complaints management (excluding consumer complaints and product defect reports) in printed form or via electronic mail exchange (email) relating to the Customers and data subjects who are not Customers:** Polymer Technical Customer Service Manager, Polymer Technical Customer Service staff members, Domestic Polymer Sales Manager, Sales Expert, Group Key Account & Other Exports Manager, Group Senior Key Account Manager, Customer Service Manager, Customer Service Coordinator.
- **Order placement:** Customer Service staff members, Sales Representatives, Credit Managers, Forwarding Organisers.
- **Reconciliation related to releasing credit blocks, financial feasibility assessment of orders:** Customer Service staff members, Sales Representatives, Credit Managers.
- **Conducting MOL Petrochemicals customer satisfaction surveys:** Group Petrochemicals Product Management, Group Subsidiary and Business Support, company engaged to conduct MOL Petrochemicals customer satisfaction surveys: Ipsos.
- **Sending general marketing messages, information materials to Customers via email about news and events related to MOL Petrochemicals, MOL Petrochemicals products and services, invitations to MOL Petrochemicals-related events:** Group Petrochemicals Product Management, Polymer Reg. Sales Development MOL.
- **For the purpose of enforcement of data retention-related legal claims associated with communication established by Customer Service and Technical Service with the Customers, as well as effective defence in legal disputes or official proceedings:** Group Petrochemical Sales Manager,



Petrochemical Sales MOL Manager Customer Service Manager, Customer Service staff members, and competent employees of the Legal Department for the purpose of legal assistance for the enforcement of claims and defence in court and administrative proceedings.

**Name, registered seat, telephone number, website (where the privacy notices are available) and email address of Processors:**

- **MOL GBS Magyarország Kft.** – handling postal items, credit management, billing services (registered seat: 1039 Budapest, Szent István utca 14., email address: gbs@mol.hu.
- **Meló-Diák Universitas Szolgáltató Iskolaszövetkezet** – recording data of potential Customers (clients) in the CRM system, processing payment records as part of the order placement process (registered seat: H-2724 Újlengyel, Kossuth utca 136, website: www.melodiak.hu, email address: info@melodiak.hu).
- **Ipsos** – conducting customer satisfaction surveys (registered seat: [Budapest H-1139, Pap Károly u. 4-6] CRN: [\*] phone number: [+36 1 476-7600 ] email address: [huinfo@ipsos.com])
- **Atradius Crédito y Caución S.A. de Seguros y Reaseguros Magyarországi Fióktelepe** – credit insurance services (registered seat: H-1117 Budapest Fehérvári út 50-52 CRN: 01-17-000324 phone number: + 36 1 382 7590 email address: info-hu@atradius.com)
- **Atradius Collections B. V. Magyarországi Fióktelepe** – debt collection services (registered seat: H-1117 Budapest Fehérvári út 50-52 CRN: 01-17-000480 phone number: +36 1 382 7598 email address: [info.hu@atradius.com](mailto:info.hu@atradius.com))
- **MOL Austria Handels GmbH** registered seat: Walcherstrasse 11A, 7.stock A-1020 Wien Court Registration Number: 84355 b, phone: +43 1 211 20 1120 fax: +43 1 211 20 1198 email: JHauk@molaustria.at, LMotloch@molaustria.at
- **TIFON d.o.o.** registered seat: Zadarska 80 HR – 10000 Zagreb Hrvatska Court Registration Number: 080259504 phone: +385 1 6160 600 Fax: +385 1 6160 601 email: polymersales@tifon.hr
- **MOL Germany GmbH** registered seat: Im Trutz Frankfurt 49 D-60322 Frankfurt am Main Deutschland CRN: HRB 67113 München phone: +49 69 154-04-12 fax: +49 69 154-04-41 email: polymersales@molgermany.de
- **MOL Italia S.r.l.** – registered seat: Via Montefeltro,4 - 20156 Milano, Italy, CRN: 347927 vol. 8535 fascicolo 27 phone: +39 02 58 30 55 23 fax: +39 02 58 30 34 92 email: molitalia@molgroupitaly.it
- **SLOVNAFT POLSKA S.A.**, PetChem Department registered seat: ul. Postępu 17D 02-676 Warsaw Court CRN: KRS 126418 phone: +48-22-545-70-70 fax: +48-22-545-70-60 email: petchem@slovnaft.pl www.slovnaft.pl
- **SC. MOL Romania PP SRL** registered seat: Str. Danielopolu 4-6 ET2 Sector 1 Cod 014134 Bucuresti, Romania CRN: J 12/729/2000 phone: +40 21 204 85 00, +40 21 204 8502 mobile: +40 728 08 34 45 fax: +40 21 232 10 59 email: petchem@molromania.ro
- **MOL Ukraine LLC** registered seat: UA-04073 , Stepana Bandery 23, office 701 CRN: 33995588 phone: +380 44 374 00 80 fax: +380 44 374 00 90 email: JZavojko@mol-ukraine.com.ua
- **SLOVNAFT, a.s.** registered seat: Vlčie hrdlo 1 824 12 Bratislava Slovenská republika CRN: 426/B phone : +421 2 5859 7515 email: polymersales@slovnaft.sk
- **PRS Management B.V.** Registered seats Het Schakelplein 14-16, 5651 GR Eindhoven, The Netherlands info@prs-pooling.com +31(0)40 266 2110

Identification number: 10148131

**Contact person(s) of the Processors:**

- **MOL Magyarország Társasági Szolgáltatások Kft.** – gbs@mol.hu
- **Meló-Diák Universitas Szolgáltató Iskolaszövetkezet** – info@melodiak.hu
- **MOL GBS Magyarország Kft.**(. – mpk-ar@petrochemicals.mol.hu
- **Ipsos** huinfo@ipsos.com
- **Atradius Crédito y Caución S.A. de Seguros y Reaseguros Magyarországi Fióktelepe** info-hu@atradius.com
- **Atradius Collections B. V. Magyarországi Fióktelepe** info.hu@atradius.com
- **MOL-Austria Handels GmbH** JHauk@molaustria.at, LMotloch@molaustria.at
- **TIFON d.o.o.** Email: polymersales@tifon.hr
- **MOL Germany GmbH** polymersales@molgermany.de
- **MOL Italia S.r.l** molitalia@molgroupitaly.it
- **SLOVNAFT POLSKA S.A** petchem@slovnaft.pl
- **SC. MOL Romania PP SRL** petchem@molromania.ro
- **MOL Ukraine LLC** Zavojko@mol-ukraine.com.ua
- **SLOVNAFT, a.s.** polymersales@slovnaft.sk
- **PRS Management B.V.** info@prs-pooling.com
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**Privacy Officers of the Processors:**

- **MOL GBS Magyarország Kft.**– dpo@mol.hu
- **Meló-Diák Universitas Szolgáltató Iskolaszövetkezet** – info@melodiak.hu
- **MOL GBS Magyarország Kft.**(. – dpo@mol.hu
- **Ipsos** hunfo@ipsos.com
- **Atradius Crédito y Caución S.A. de Seguros y Reaseguros Magyarországi Fióktelepe** info-hu@atradius.com
- **Atradius Collections B. V. Magyarországi Fióktelepe** info.hu@atradius.com
- **MOL-Austria Handels GmbH** JHauk@molaustria.at, LMotloch@molaustria.at
- **TIFON d.o.o.** Email: polymersales@tifon.hr
- **MOL Germany GmbH** polymersales@molgermany.de

- **M Italia S.r.l** molitalia@molgroupitaly.it
- **SLOVNAFT POLSKA S.A** petchem@slovnaft.pl
- **SC. MOL Romania PP SRL** petchem@molromania.ro
- **MOL Ukraine LLC** Zavojko@mol-ukraine.com.ua
- **SLOVNAFT, a.s.** polymersales@slovnaft.sk
- **PRS Management B.V.** info@prs-pooling.com

**Persons at the Processors who are authorised to access the data:**

- **MOL GBS Magyarország Kft.** – competent employees involved in handling postal items
- **Meló-Diák Universitas Szolgáltató Iskolaszövetkezet** – members of the school cooperative involved in recording data of potential Customers (clients) in the CRM system, processing payment records as part of the order placement process
- **MOL GBS Magyarország Kft.** (– competent employees involved in credit management, billing services
- **Ipsos** – competent employees involved in conducting customer satisfaction surveys
- **Atradius Crédito y Caución S.A. de Seguros y Reaseguros Magyarországi Fióktelepe** – competent employees involved in credit insurance services
- **Atradius Collections B. V. Magyarországi Fióktelepe** – competent employees involved in debt collection services
- **MOL-Austria Handels GmbH** Polymer Sales staff members
- **TIFON d.o.o.** Polymer Sales staff members
- **MOL Germany GmbH** Polymer Sales staff members
- **MOL Italia S.r.l** Polymer Sales staff members
- **SLOVNAFT POLSKA S.A** Polymer Sales staff members
- **SC. MOL Romania PP SRL** Polymer Sales staff members
- **MOL Ukraine LLC** Polymer Sales staff members
- **SLOVNAFT, a.s.** Polymer Sales staff members
- **PRS Management B.V.** Logistic staff members

**Processing sensitive personal data for the purposes described in this Notice:** no sensitive personal data are processed.

**Transfer of personal data to a third country:** no personal data are transferred to third country.

**The existence of automated decision-making, including profiling and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject:** no automated decision-making or profiling are involved.

**Data security measures:**

The Controllers shall plan and carry out data processing operations in a way so as to protect the privacy of data subjects in the context of application of the GDPR and other legal regulations on data processing.

The Controllers shall provide for security of data, take appropriate technical and organisational measures, as well as develop adequate procedural rules required for the enforcement of the GDPR and other rules on data protection and confidentiality.

Controllers shall protect data by means of suitable measures commensurate to the degree of risks involved against unauthorised access, alteration, transmission, public disclosure, deletion or destruction, as well as accidental damage and loss, provided that stored data cannot be corrupted and rendered inaccessible due to any changes in or modification of the applied technique. Accordingly, the Controllers shall store the personal data of the data subject in a password protected and/or encrypted database. As part of the protection commensurate to the degree of risks involved, the Controllers shall protect data with firewalls, antivirus programs, encryption mechanisms, content filtering, as well as other technical and process solutions. Data security incidents shall be continuously monitored.

**Your data processing rights:**

The GDPR contains in detail your data protection rights, your possibilities of seeking a legal remedy and the restrictions thereof (in particular, GDPR Art. 15, 16, 17, 18, 19, 21, 22, 77, 78, 79, 82). You can request at any time information about your personal data processed, you can request the rectification and erasure of your personal data or the restriction of their processing, furthermore you can object to the data processing based on a legitimate interest. Find a summary of the most important provisions below.

As part of providing information, the Company draws your particular attention to the following:

**You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legitimate interests of the Company. The Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.**

**Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing.**

**If you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.**

**Right to information:**

If the Company processes your personal data it must provide you information concerning the data relating to you – even without your special request – including the main characteristics of the data processing just as the purpose, grounds and duration of control, the name and contact details of the Company and its representative, contact details of its data privacy officer, the recipients of the personal data, the legitimate interests of the Company and/or third parties in case of a data processing based on a legitimate interest, furthermore your data protection rights and your possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority); furthermore, if you are not the source of data, then the source of personal data and the categories of personal data concerned, in the case if you do not yet have this information. The Company provides you this information by making this Privacy Notice available to you.

**Right to access:**

You have the right to obtain from the Company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain information related to the data processing such as the purpose of the data processing, the categories of the personal data processed, the recipients of the personal data, the (scheduled) duration of the data processing, the data subject's data protection rights and possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), furthermore information on the source of the data where they are collected from you.

Upon your request the Company shall provide a copy of your personal data undergoing processing. For any additional copies you request, the Company may charge a reasonable administrative fee. If you make the request by electronic means, and, unless you request otherwise, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

**Right to rectification:**

You have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement

**Right to erasure:**

You have the right to obtain from the Company the erasure of personal data concerning you without undue delay and the Company has the obligation to erase personal data without undue delay where certain conditions are met. Among other grounds the Company is obliged to erase your personal data upon your request for example if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; if you withdraw your consent on which the processing is based, and where there is no other legal ground for the processing; if the personal data have been unlawfully processed; or if you object to the processing and there are no overriding legitimate grounds for the processing; if the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject.

The above provisions shall not apply to the extent that processing is necessary:

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

**Right to restriction of processing:**

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

- a) you contest the accuracy of the personal data, for a period enabling the Company to verify the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- c) the Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- d) you have objected to processing, pending the verification whether the legitimate grounds of the Company override your legitimate grounds.

Where processing has been restricted according to the above reasons, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims, or the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

You shall be informed by the Company before the restriction of processing requested by you is lifted.

**Right to object:**

**You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legitimate interests of the Company. The Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.**

**Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing.**

**If you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.**

**How to exercise your rights:**

The Company shall provide information on action taken on a request based on your above rights without undue delay and in any event **within one month** of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Company shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. If you submitted the request electronically, the requested information shall be made available to you in electronic format, unless you expressly provided otherwise.

If the Company does not take action on your request, the controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the competent data protection supervisory authority (In Hungary, the Nemzeti Adatvédelmi és Információszabadság Hatóság (*National Authority for Data Protection and Freedom of Information*) briefly '**NAIH**') and seeking a judicial remedy. Contact details of NAIH (address: 1125 Budapest Szilágyi Erzsébet fasor 22/C., Tel: +36 1 391 1400, Fax: +36-1-391-1410, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: <http://naih.hu/>)

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

Without prejudice to other administrative or judicial proceedings, you have the right to lodge a complaint to a supervisory authority - in particular in the Member State of your habitual place of stay, place of work or the place of the alleged infringement - if you consider that the processing of personal data relating to you violates provisions of the GDPR. You shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning you. You shall also have the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform you within three months on the progress or outcome of the complaint lodged. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, you shall have the right to an effective judicial remedy you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company, its controller or processor partner shall be brought before the courts of the Member State where the Company, its controller or processor partner has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

In Hungary, the action falls within the jurisdiction of the Törvényszék (General Court). For information on jurisdiction and contact details of courts, visit the following website: [www.birosag.hu](http://www.birosag.hu)

If the court rules in your favour, finds that infringement was committed and obliges the Company and the processor engaged to stop unauthorised processing operations and to restore legality of processing, and requires them to engage in a certain conduct to ensure that your rights can be exercised and, if applicable, also decides on compensation and restitution claims. The court may order disclosure of the judgement by disclosure of identification data of the Company and the processor if the judgement affects a wide range of persons or the gravity of the breach justifies disclosure.