PRIVACY NOTICE
DIGITAL MARKETING ACTIVITY RELATED TO THE MOL MOVE PROGRAM

Date: 5 October 2022

MOL Nyrt. ("**MOL**") attaches great importance to ensuring that its current offers related to its products and services reach the widest possible audience of its customers and potential future customers. To this end, MOL conducts advertising campaigns on social media platforms and displays advertisements using digital marketing solutions available on social media platforms.

In the course of the digital marketing solutions, MOL will use personal data within the meaning of Article 4(1) of the General Data Protection Regulation 2016/679 (EU) ("**GDPR**") of its customers who previously registered for the MOL MOVE Program.

This Privacy Notice provides information about the processing of personal data in relation to targeted ads created using Facebook Custom Audience ("**FCA**") provided by Facebook and Google Customer Match ("**GCM**") provided by Google.

Brief description of the processing activities

1. **Using Facebook Custom Audience to identify "advertising audiences"**

   Facebook Custom Audience is a solution for creating targeted ads that allows MOL to find already existing audiences for its products and services among users with Facebook accounts ("advertising audience").

   Once the advertising audience has been created, the ads that MOL has compiled in Facebook Business Manager's Ad Manager are displayed by Facebook to the advertising audience.

   MOL uses three types of FCA:

   - **Creating an advertising audience based on a customer list** ("Customer List Custom Audience")

     Customer List Custom Audience is created based on the personal data of customers already registered in the MOL MOVE Program.

MOL will upload the database of personal data of its previously registered customers (customer list) to the Facebook advertiser platform (Facebook Business Manager). The customer list data uploaded by MOL is converted by Facebook into a random code using a cryptographic method called "hashing", as a result of which individual customers cannot be identified based on the individual customer data.

Facebook compares this random code-substituted customer list with the personal data of users in its own hashed database - a process known as matching. The resulting customer list-based advertising audience is a cross-section of the customers on the customer list uploaded by MOL and the customers in Facebook's database (i.e. with Facebook accounts).

MOL does not know the unique, so-called individual-level (i.e. person-specific) data of the advertising audience resulting from the matching, nor does MOL know which of the customers on the original customer list it uploaded were included in the advertising audience. Due to the way Facebook Business Manager works, MOL is unable to open the advertising audience data file and only knows the size of the advertising audience.

More information about creating an advertising audience based on a customer list is available here:
https://www.facebook.com/business/help/170456843145568?id=2469097953376494

- **Creating advertising audiences based on browsing on a website** [https://www.molmove.hu/] ("Website Custom Audiences")

The basis for creating a website custom audience is the use of the so-called Facebook Pixel on the website. This is a targeting solution that uses Facebook Pixel to match users who visit MOL's website with users who have Facebook accounts.

The Facebook Pixel is a piece of JavaScript code placed on a website that allows you to measure the effectiveness of advertising by helping you interpret what users are doing on the website. For example, an ad campaign can be run to reach website visitors who have visited a product page but not made a purchase.

The Facebook Pixel collects four types of data about a website:

(i) HTTP headers: This includes users' IP addresses, information about the browser and operating system they are using
(ii) Pixel-specific data: This includes the pixel identifier and the Facebook Pixel cookie[1]
(iii) Clicking data: This includes the buttons clicked by visitors to the website, the names of the buttons and the pages visited as a result of the clicks.

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[1] For more details on how the Facebook Pixel works, see Facebook's cookie policy, available here: https://www.facebook.com/policies/cookies/ and https://www.facebook.com/business/help/471978536642445?id=1205376682832142

(iv) Form field names: This includes the names of fields a website visitor can fill in, such as "email", "address" and "quantity" when a visitor purchases a product or service. The pixel does not record the field values (i.e. the specific email address, address, quantity, etc. entered).

The aforementioned matching performed by Facebook when creating an advertising audience based on browsing the website is based on the data stored in Facebook Pixel. MOL indicates Facebook Pixel as the source data for determining the advertising audience in Facebook Business Manager without access to the individual-level data stored in the Facebook Pixel (i.e. person-specific). Facebook uses the data stored by the Facebook Pixel to identify the advertising audience in aggregate form, i.e. MOL only sees the advertising audience as a whole, not individual persons. For example, MOL can see the size of the target audience, but not the individual users in the target audience, the advertising audience data file cannot be opened due to the functionality of Facebook Business Manager.

For more information about creating an advertising audience based on browsing the website, click here:
https://www.facebook.com/business/help/610516375684216?id=2469097953376494

- **Creating advertising audiences based on activity on a mobile application [MOL Move]** ("App Activity Custom Audience")

The creation of a mobile app activity custom audience is based on the recording of in-app actions (app events). An in-app action can be, for example, viewing specific content, searching for a product, adding a product to a shopping cart or purchasing a product.

When an advertising audience is created based on mobile app activity, Facebook conducts the above matching based on the recorded in-app actions of users of that mobile app. MOL can select the in-app actions one by one in Facebook Business Manager as the source data for defining the advertising audience, without access to the individual-level (i.e., person-specific) data (i.e., the individual actions of identifiable mobile app users). Facebook uses the data to identify the advertising audience in aggregate form, i.e. MOL only sees the advertising audience as a whole, not individual persons. For example, MOL can see the size of the advertising audience, but not the individual users in the advertising audience, the advertising audience data file cannot be opened due to the functionality of Facebook Business Manager.

For more information about creating an advertising audience based on mobile app activity, click here:
https://www.facebook.com/business/help/285857478228227?id=1858550721111595

2. **Using Facebook Custom Audience to identify "lookalike advertising audiences"**

Identifying a lookalike advertising audiences gives MOL the opportunity to reach new people who are likely to be interested in MOL's products and services.

The methodology is based on the fact that a person with similar interests to a customer enrolled in the MOL MOVE Program, but not yet enrolled in the MOL MOVE Program, may be interested in products and services the enrolled customer is interested in, as these persons are assumed to have similar characteristics as existing MOL customers.

The basis for identifying a lookalike audience is the target audience described in the first section. The created advertising audience is compared by Facebook with users with Facebook accounts who are not part of the advertising audience, based on the geographic area (e.g. Hungary) and the user base (e.g. 5 % of the population of Hungary) specified by MOL in Facebook Business Manager. As a result of the comparison, Facebook creates a lookalike advertising audience that includes users with similar interests to the MOL advertising audience based on Facebook activity, but does not include members of the MOL advertising audience. For example, MOL can see the size of the lookalike advertising audiences, but not the individual users in the lookalike advertising audiences, the advertising audience data file cannot be opened due to the functionality of Facebook Business Manager.

Once the lookalike advertising audiences has been identified, the ads that MOL has compiled in Facebook Business Manager's Ad Manager are displayed by Facebook to the lookalike audience.

More information about the identification of a lookalike advertising audiences based on a customer list is available here:
https://www.facebook.com/business/help/164749007013531?id=401668390442328
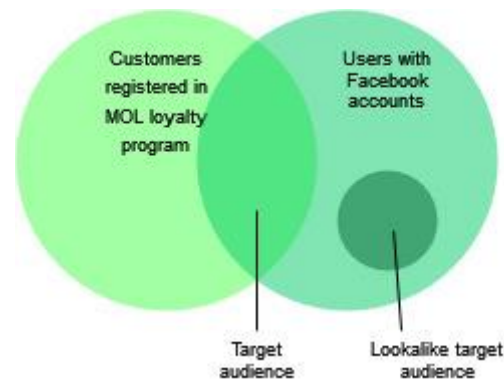
3. **Using Google Customer Match to identify "advertising audiences"**

Google Customer Match ("**GCM**", Customer Match) allows MOL to reach and target customers already enrolled in the MOL MOVE Program through the Google Search Network, Gmail, YouTube and the Display Network, using the email address that customers provide during their MOL MOVE Program registration.

To use GCM, MOL will upload a previously compiled customer list to the Google Ads Customer Match platform. The uploaded customer data files are used by Google solely for the purpose of matching customers with Google Accounts. During the matching process, Google does not access the unique email addresses in the uploaded customer list because it converts them into random codes using the "SHA256" 256-bit Secure Hash Algorithm solution. The core of the method is to encrypt the same identifier (in this case an email address) in the same way every time. If, for example, MOL and Google encrypt the same email address, the random code assigned to the identifier will be the same for the encrypted identifier in the MOL customer list and the encrypted identifier in Google's own database, so they can be paired without having to see the identifier replaced by the random code. For example, the email address xy@email.com will appear in the customer list as QWER987. If the email address xy@email.com is also in Google's own database, it will also appear there as QWER987. So, when matching the two databases, it is sufficient to know that QWER987 appears in both sets, without the need to know the actual email address.

From the matching data, GCM creates an advertising audience. MOL cannot identify specific individuals in the advertising audience, it only knows the size of the advertising audience.

Once the advertising audience has been identified, MOL's ads are displayed by Google to the advertising audience.

More information on creating a GCM advertising audience is available here: https://support.google.com/google-ads/answer/6334160

4. **Creating a "similar audience" using Google Similar Audience ("GSA")**

Google's Similar Audience targeting, available within GCM, allows creating a similar advertising audience, which allows MOL to display ads to people using Google services who share characteristics with MOL's existing customers.

Google uses the GCM target audience to analyse the characteristics of users and searches its database for other individuals with similar characteristics. Google Ads helps aggregate the search behaviour of the users in the list by reviewing the recent search activity of users in MOL's advertising audience. Based on this information, Google's system automatically searches for potential new customers whose search habits are similar to those of the users in the target audience (existing customers). To do this, it uses data about the browsing activity of the relevant users on Google websites, videos and

apps. This data is not accessible by MOL. Once a lookalike advertising audience has been created, MOL may serve ads to these individuals on Google platforms. MOL's ads will be displayed by Google to the lookalike audience.

More information about similar audience created using GCM's Google Similar Audience feature is available here: https://support.google.com/google-ads/answer/7151628

Description of the characteristics of the processing activity

The table below describes the precise purpose, legal basis, duration of the afore-mentioned data processing activities, scope and source of the data processed, the recipients of the transfers and the data processors engaged.

Designation and purpose of data processing	Legal basis of data processing	Scope and source of data processed	Duration of data processing	Recipient of the data transfer	Data processor and the data processing activity
Creating a "Customer List Custom Audience" using the Facebook Custom Audience ("FCA") service by using the email address, phone number, mobile ad ID, Facebook app user ID, name, zip code, city, country, date of birth, gender, and age provided in the course of registration by users who registered for the MOL MOVE Program. Creating an advertising audience allows MOL to use Facebook to display ads for its products and services to its existing customers who have Facebook accounts.	Article 6(1)(a) of the GDPR (voluntary consent of the data subject).	**Categories of personal data processed**: MOL only processes the e-mail addresses of users. MOL cannot identify specific individuals in the target audience created by Facebook based on the customer list, only the size of the target audience. **Scope of processed data**:	Until the data subject withdraws consent.	MOL does not transfer the data to third parties.	Meta Ireland Platforms Limited., address: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland, provider of the Facebook platform ("**Meta Ireland**") The data processing agreement between MOL and Facebook, which sets out the terms and conditions of data processing and the rights and obligations of the parties, is available at here and here. Facebook encrypts the data uploaded by MOL using a so-called hashing method. Hashing is a cryptographic method that converts database data uploaded to Facebook into

Designation and purpose of data processing	Legal basis of data processing	Scope and source of data processed	Duration of data processing	Recipient of the data transfer	Data processor and the data processing activity
		Customer lists compiled by MOL in the course of running the MOL MOVE Program. The users' mobile ad ID, Facebook app user ID, name, zip code, city, country, date of birth, gender, and age is processed by Facebook, and is not processed by or disclosed in any form to MOL.			random code. Facebook then uses a matching process to compare the hashed data with different Facebook profiles to create a target audience and show MOL ads to the members of the target audience.
Creating browsing-based advertising audiences based on browsing on the Website [https://www.molmove.hu/] ("**Website Custom Audiences**") by means of Facebook Pixel during the Custom Audience ("FCA") and Website usage. The Facebook Pixel allows MOL to show users who visit the Website personalized ads on Facebook that suit their interests about MOL's products and services	Article 6(1)(a) of the GDPR (voluntary consent of the data subject).	Data generated by the Facebook Pixel set up on the Website during the logged browsing activity of the user on the Website: the IP address of the user, the time of use of the Website, the browser used, the content viewed and other actions such as adding products to shopping cart, purchases. Facebook uses this	Facebook stores the data for a maximum of 180 days after the last access to the Website by the data subject.	When using the Facebook Pixel, MOL and Meta Ireland act as joint data controllers. The rights and obligations of MOL and Meta Ireland in relation to data processing are governed by a joint controller agreement. The joint controller agreement	MOL does not transfer the data to data processors.

Designation and purpose of data processing	Legal basis of data processing	Scope and source of data processed	Duration of data processing	Recipient of the data transfer	Data processor and the data processing activity
based on their browsing on the Website. The Facebook Pixel also allows MOL to analyse the effectiveness of its Facebook ads, such as: number of impressions, number of appearances, clicks, cost per click, cost per 1,000 impressions (CPM), number of views for videos, etc.		information to identify the advertising audience in aggregate form. MOL only sees the aggregate (size) of the target audience, not individual persons. **Source of data**: Directly the data subject.		("Controller Agreement") is available here: https://www.facebook.com/legal/controller_addendum.	
Creating an advertising audience based on activity on a mobile application (app) [MOL Move] ("App Activity Custom Audience") using Facebook Custom Audience The advertising audience based on activity on the mobile app allows MOL to transmit data directly from the app to Facebook about users' actions in the app, so that Facebook can as a result serve MOL ads to these audiences.	Article 6(1)(a) of the GDPR (voluntary consent of the data subject).	**Categories of personal data processed:** The email address, name, telephone number, address, gender and advertising ID of app users in encrypted form, the actions they perform in the app (app-event), e.g. downloading or opening the app, viewing specific content, searching for a product, adding a product to a shopping	Facebook will store the data for up to 180 days after the action is recorded in the app.	In the event of the creation of an advertising audience based on mobile app activity, MOL and Meta Ireland will act as joint controllers. The rights and obligations of MOL and Meta Ireland in relation to data processing are governed by a joint controller agreement. The joint controller	MOL does not transfer the data to data processors.

Designation and purpose of data processing	Legal basis of data processing	Scope and source of data processed	Duration of data processing	Recipient of the data transfer	Data processor and the data processing activity
		cart or purchasing a product. **Source of processed data**: Directly the data subject.		agreement ("Controller Agreement") is available here:	
Using Facebook Custom Audience to identify "lookalike advertising audiences". A lookalike advertising audience is a group of users with Facebook accounts who share similar interests with the advertising audience created with the help of MOL FCA. There is no overlap between the advertising audience and the lookalike audience. The purpose of creating a lookalike audience is to allow MOL to show Facebook ads to users with Facebook accounts that are assumed to have similar interests to its existing customers. To create a lookalike audience, an initial advertising audience of at	Article 6(1)(a) of the GDPR (voluntary consent of the data subject).	**Categories of personal data processed:** Advertising audience created in the frames of FCA. MOL cannot identify specific individuals, it only knows the size of the target audience. **Source of processed data**: Databases compiled by MOL in the course of running the MOL MOVE Program.	Until the data subject withdraws consent.	Meta Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) is the independent data controller for the lookalike audience. By combining the advertising audience database with keywords related to MOL's products and services, Facebook is looking for users with similar interests to MOL's	MOL does not transfer the data to data processors.

Designation and purpose of data processing	Legal basis of data processing	Scope and source of data processed	Duration of data processing	Recipient of the data transfer	Data processor and the data processing activity
least 100 people from one country is required.		If the underlying advertising audience is based on browsing or in-app actions, the source of the data processed is the data subject.		existing customers among its own registered users.	
Using Google Customer Match to identify "advertising audiences" The GCM allows MOL to use Google to serve ads determined by MOL to an advertising audience of users already enrolled in the MOL MOVE Program based on their available email address, name, country, postcode, city, gender, date of birth, age.	Article 6(1)(a) of the GDPR (voluntary consent of the data subject).	**Scope of processed data:** MOL only processed the e-mail address in a form encrypted by a hashing process. MOL only knows the number of accounts that match as a result of matching, i.e. the size of the target audience, and does not know the specific individuals in the target audience. The users' name, country, postcode, city, gender, date of birth, age is processed by Google,	Until the data subject withdraws consent.	MOL will not transfer the data to third parties.	**Google LLC,** address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, California, United States. **Google Ireland Limited** Gordon House Barrow Street Dublin 4, D04E5W5 Ireland. MOL makes the list of users' email addresses available to Google. Before uploading, Google converts the data into random codes using a one-way hash process with SHA256 algorithm. Google also encodes its own database according to SHA256, creating a hashed list of identifiers. Google then performs a matching process to compare MOL data with different Google user accounts.

Designation and purpose of data processing	Legal basis of data processing	Scope and source of data processed	Duration of data processing	Recipient of the data transfer	Data processor and the data processing activity
		and is not processed by or disclosed in any form to MOL. Google does not share any additional information with MOL about whether or not it found a match for a particular email address. **Source of processed data:** E-mail databases compiled by MOL in the course of running the MOL MOVE Program.			GCM checks the matches in both sets of hashed identifiers to identify common hashed values.
Creating a "*similar audience*" using Google Similar Audience ("GSA") The use of GSA is an additional processing activity related to GCM. In the service Google uses the target audience created by GCM to analyse the	Article 6(1)(a) of the GDPR (voluntary consent of the data subject).	**Categories of personal data processed**: Data collected about the browsing activity of relevant consumers on Google websites, videos and apps through cookies. This	Until the data subject withdraws consent.	When using GSA, Google Ireland Limited (of 3rd Floor, Gordon House, Barrow Street, Dublin 4, Ireland) acts as an independent data controller.	MOL does not transfer the data to data processors.

Designation and purpose of data processing	Legal basis of data processing	Scope and source of data processed	Duration of data processing	Recipient of the data transfer	Data processor and the data processing activity
characteristics of users and searches its database for other individuals with similar characteristics. The definition of a 'similar audience' allows MOL to use Google's systems to show ads about MOL's products or services to people who are likely to be interested in MOL's products and services but who are not in MOL's database.		data will only be known to MOL in aggregate form. **Source of processed data**: E-mail databases compiled by MOL in the course of running the MOL MOVE Program.			

Name, registered seat, telephone number, website (where the privacy notices are available) and e-mail address of data controller(s):

1. **Creating an advertising audience based on a customer list ("Customer List Custom Audience")**

   MOL Nyrt.
   1117 Budapest, Október huszonharmadika u. 18.,
   +36 1 886 5000
   www.mol.hu
   ugyfelszolgalat@mol.hu

   MOL Nyrt. acts as an independent data controller, independently determines the purposes and scope of data processing, has independent responsibility for data processing and has its own privacy policy.

2. **Creating advertising audiences based on browsing on the website [https://www.molmove.hu/] ("Website Custom Audiences")**

   MOL Nyrt.
   1117 Budapest, Október huszonharmadika u. 18.,
   +36 1 886 5000
   www.mol.hu
   ugyfelszolgalat@mol.hu

   Meta Ireland Limited.,
   4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland
   https://www.facebook.com/policy.php

   MOL Nyrt. and Meta Ireland Limited are joint controllers within the meaning of Article 26 of the GDPR, as the administrators acting on behalf of MOL Nyrt. and Meta Ireland Limited jointly determine the purposes and means of data processing. In the course of joint data processing the parties' obligations in relation to data processing are set out in the Joint Controller Agreement ("Controller Addendum"), which is available here: https://www.facebook.com/legal/controller_addendum

3. **Creating an advertising audience based on activity on a mobile application [MOL Move] ("App Activity Custom Audience")**

MOL Nyrt.
1117 Budapest, Október huszonharmadika u. 18.,
+36 1 886 5000
www.mol.hu
ugyfelszolgalat@mol.hu

Meta Ireland Limited.,
4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland
https://www.facebook.com/policy.php

MOL Nyrt. and Meta Ireland Limited are joint controllers within the meaning of Article 26 of the GDPR, as the administrators acting on behalf of MOL Nyrt. and Meta Ireland Limited jointly determine the purposes and means of the processing. In the course of joint data processing the parties' obligations in relation to data processing are set out in the Joint Controller Agreement ("Controller Addendum"), which is available here: https://www.facebook.com/legal/controller_addendum

4. **Using Facebook Custom Audience to identify "lookalike advertising audiences"**

MOL Nyrt.
1117 Budapest, Október huszonharmadika u. 18.,
+36 1 886 5000
www.mol.hu
ugyfelszolgalat@mol.hu

MOL Nyrt. acts as an independent data controller, independently determines the purposes and scope of data processing, has independent responsibility for data processing and has its own privacy policy.

5. **Using Google Customer Match to identify "advertising audiences"**

MOL Nyrt.
1117 Budapest, Október huszonharmadika u. 18.,
+36 1 886 5000
www.mol.hu

ugyfelszolgalat@mol.hu).

MOL Nyrt. acts as an independent data controller, independently determines the purposes and scope of data processing, has independent responsibility for data processing and has its own privacy policy.

5. **Creating a similar audience using Google Customer Match - Similar Audience**

MOL Nyrt.
1117 Budapest, Október huszonharmadika u. 18.,
+36 1 886 5000
www.mol.hu
ugyfelszolgalat@mol.hu).

MOL Nyrt. acts as an independent data controller, independently determines the purposes and scope of data processing, has independent responsibility for data processing and has its own privacy policy.

Contact person(s) of Data Controller(s):

MOL Retail Customer Service
1117 Budapest, Október huszonharmadika u. 18.,
+36 1 886 5000
ugyfelszolgalat@mol.hu).

Name and contact details of the Data Controllers' Data Protection Officer(s):

dpo@mol.hu

Persons at the Data Controller who are authorised to access to the data (per purpose of processing):

1. Marketing, digital, communications staff.
2. Where necessary for legal claims, employees of MOL LEGAL may have access to the data necessary for pursuing legal claims

Name, registered seat, telephone number, website (where the privacy notices are available) and e-mail address of Data Processors(s) and other data processing recipients:

1. **Meta Ireland Limited**
   Address: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland
   Contact: https://www.facebook.com/help
   Privacy Notice: https://www.facebook.com/policy.php

2. **Google LLC**
   Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, California, United States
   Contact: https://support.google.com/policies/troubleshooter/9009584
   Privacy Notice: https://policies.google.com/privacy

3. **Google Ireland Limited**
   Address: Gordon House Barrow Street Dublin 4, D04E5W5 Ireland
   Contact: https://support.google.com/policies/troubleshooter/9009584
   Privacy Notice: https://policies.google.com/privacy

Processing of special personal data for the purpose specified in this Privacy Notice:

In the course of the digital marketing activity, we do not process any special personal data about you.

Data transfer to third country:

In the course of the services personal data may also be processed in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.

1. **Meta Ireland Limited**

   a. Meta Ireland may use additional data processors outside the European Union/European Economic Area for the operation and maintenance of the data centre infrastructure for the FCA service. In this case, the basis for the onward transfer of data to sub-processors is Module 3 (Standard Contractual Clauses for data transfers between a data processor and a data processor) of Commission Implementing Decision (EU) 2021/914 on standard contractual clauses for the transfer of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council

("Regulation (EU) 2016/679") ("Standard Contractual Clauses" or "SCC"). The countries of destination of the data transfers are listed below: https://www.facebook.com/legal/ads-subprocessors .

b. Meta Ireland transfers data to Meta Platforms Inc. (address: 1601 Willow Road Menlo Park, CA 94025, California, United States) the basis for which is Module 3 (Standard Contractual Clauses for data transfers between a data processor and a data processor) of Commission Implementing Decision (EU) 2021/914 on standard contractual clauses for the transfer of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council ("Regulation (EU) 2016/679") ("Standard Contractual Clauses" or "SCC"). The countries of destination of the data transfers are listed below: https://www.facebook.com/legal/EU_data_transfer_addendum/update .

2. **Google LLC**

a. Google LLC may transfer personal data to data processors outside the European Union/European Economic Area.

i. Where a third country is the subject of an adequacy decision pursuant to Article 45 of the General Data Protection Regulation 2016/679 (EU) ("GDPR"), the transfer will be made on the basis of the adequacy decision. A list of currently adopted adequacy decisions is available here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en .

ii. In the absence of an adequacy decision, the basis for the onward transfer is Module 3 (Standard Contractual Clauses for data transfers between a data processor and a data processor) of Commission Implementing Decision (EU) 2021/914 on standard contractual clauses for the transfer of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council ("Regulation (EU) 2016/679") ("Standard Contractual Clauses" or "SCC"). In this case, MOL may carry out audits as specified in the Standard Contractual Clauses. During the audit, Google will make all information required in the Standard Contractual Clauses available. The countries of destination of the data transfers are listed below: https://business.safety.google/adsprocessorterms/.

The fact of automated decision-making, including profiling, and in such cases, at least comprehensible information about the applied logic and the significance of such data processing and the anticipated consequences it may lead to for the individual:

None.

Data security measures:

Information security management system	Ensuring the confidentiality, integrity and accessibility of organisational information by introducing policies, processes, process descriptions, organisational structures, software, and hardware features.
Physical access	Ensuring the protection of physical devices that contain data relevant to the MOL Group.
Logical access	Ensuring that only approved and authorised users have access to data used by MOL Group companies.
Data access	Ensuring that only the persons authorised to use the system can have access to the corporate data of the MOL Group.
Data transfer / storage / destruction	Ensuring that MOL Group company data cannot be transmitted, read, modified or deleted by unauthorised persons during data transfer or storage. In addition, it must be ensured that MOL Group company data is deleted immediately when the purpose of processing ceases.
Confidentiality and integrity	Ensuring that when MOL Group company data is processed, the data is treated and updated confidentially and in order to preserve its integrity.
Accessibility	Ensuring that MOL Group company data is protected from accidental destruction or loss and, in the event of events giving rise to these consequences, the relevant MOL Group company data is accessed and recovered in time.
Data separation	Ensuring that the data of MOL Group companies are treated separately from the data of other customers.
Incident management	In the event of any breach of MOL Group company data, the impact of the breach should be minimised and the owners of MOL Group company data should be notified immediately.
Audit	Ensuring that the processor regularly tests, examines and evaluates the effectiveness of the technical and organisational measures outlined above.

Your rights concerning data processing:
Your detailed rights and remedies and their restrictions are set forth in detail in the GDPR (especially in Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You can request information about your data at any time, request the rectification, erasure or restriction of processing of your data at any time and you have the right to data portability. We summarise the most important provisions below. ==(For a more detailed description of your rights, see the drop-down menu below).==

Right to information:
If the Data Controller processes personal data related to you, it must provide you with information – even without your request to that effect – concerning the main characteristics of the data processing, such as the purpose, legal basis and duration of processing, the identity and contact details of the Data Controller and its representative, the recipients of the personal data (in case of data transfer to third countries, also indicating the existence of adequate and appropriate safeguards), furthermore your data protection rights and your possibilities of seeking a legal remedy (including the right to lodge a complaint with the supervisory authority), in the case you have not had yet all this information. The Data Controller provides the abovementioned information by making this privacy notice available to you.

Right of Access:
You have the right to obtain from the Data Controller information as to whether or not personal data concerning you are being processed, and, where that is the case, access to that 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 (envisaged) duration of the data processing, the data subject's data protection rights and possibilities of seeking a legal remedy (including the right to lodge a complaint with the supervisory authority), furthermore information on the source of the data where the data are not collected from the data subject. Upon your request the Data Controller shall provide a copy of your personal data subject to the processing. The Data the Controller may charge a reasonable fee based on administrative costs for requested further copies. The right to obtain a copy shall not adversely affect the rights and freedoms of others. The Data Controller gives you information on the possibility, the procedure, the potential costs and other details of providing the copy upon your request.

Right to rectification
You have the right to obtain the rectification of inaccurate personal data concerning you from the Data Controller without undue delay. 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 have the personal data concerning you erased by the Data Controller without undue delay and the Data Controller has the obligation to erase personal data concerning you without undue delay where certain grounds or conditions are met. Among others, the Data Controller 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 basis for the processing; if the personal data have been unlawfully processed; if the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject.

Right to withdraw your consent:

You have the right to withdraw your consent at any time.

The ways the consent can be withdrawn:

1) **Creating an advertising audience based on a customer list ("Customer List Custom Audience")**

You can notify the Data Controller of your intention to withdraw your consent by sending an e-mail to [hello@molmove.hu].

2) **Creating an advertising audience ("Website Custom Audiences") based on browsing on a website [optionally you can take this opportunity to enter the website URL here]**

The basis for creating a website custom audience is the use of the Facebook Pixel cookie on the Website, which belongs to the Facebook Pixel. Accordingly, the way to withdraw your consent is to withdraw your consent for the Facebook Pixel cookie to function on the Website, for which further instructions can be found here: [https://www.molmove.hu/s/cookie-policy?language=hu]

Furthermore you can delete cookies in your browser. For the most commonly used browsers, the menu items for managing cookies:

- Mozilla Firefox: https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
- Google Chrome: https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en
- Internet Explorer: https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies
- Microsoft Edge: https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy

Within your Facebook account you may at any time object to the processing of your data using the Facebook Pixel and to the use of your data for the purpose of displaying Facebook ads on the following page. The path to this setting on Facebook:

- Facebook desktop version (when you open Facebook in your browser): Settings > Ads > Ad Settings > Data received from partners about your activities
- Facebook app: Settings > Custom Ads Settings > Ads Settings tab > Data received from partners about your activities

3) **Creating an advertising audience based on activity on a mobile application [optionally you can take this opportunity to give the name of the application] ("App Activity Custom Audience")**

You may at any time within your Facebook account object to the processing of your data using the Facebook Pixel and the use of your data for the purpose of displaying Facebook ads on the following page. The path to this setting is on Facebook:

- Facebook desktop version (when you open Facebook in your browser): Settings > Ads > Ad Settings > Audience-based ads
- Facebook app: Settings > Custom Ad Settings > Ad Settings tab > Audience-based ads

If you use the Facebook mobile app on iOS 14.5 or on a later operation system, you have the option to turn off in-app activity tracking on your device. The path to this setting is in iOS 14.5: Settings > Privacy > Tracking > Enable tracking request for apps / Set tracking via slider for individual mobile apps.

4) **Using Facebook Custom Audience to identify "lookalike advertising audiences"**

You may at any time within your Facebook account object to the processing of your data using the Facebook Pixel and the use of your data for the purpose of displaying Facebook ads on the following page. The path to this setting is on Facebook:

- Facebook desktop version (when you open Facebook in your browser): Settings > Ads > Ad Settings > Audience-based ads
- Facebook app: Settings > Custom ad settings > Ad settings tab > Audience-based ads

5) **Using Google Customer Match to identify "advertising audiences"**

You can notify the Data Controller of your intention to withdraw your consent by sending an e-mail to [hello@molmove.hu].

6) **Creating a "similar audience" using Google Similar Audience ("GSA")**

Within your Google Account, you can prevent websites from collecting your browsing data and tracking you at any time by activating the "Do-not-track" feature. The path to this setting: Open Google Chrome > Settings > Privacy & Security > Cookies and other site data > Send a "Do-no-track" request with your browsing traffic."

You can opt out of advertisers comparing you to different user groups based on your browsing activity in Google Chrome and displaying ads to you based on that information. The setting to do this: Open Google Chrome > Settings > Privacy & security > Privacy Sandbox.

Please note that the withdrawal of your consent does not affect the lawfulness of the processing of your data prior to withdrawal.

Right to restriction of processing.

You have the right to restriction of processing by the Data Controller where one of the following applies:

a) you contest the accuracy of the data, for a period enabling the Data Controller to verify the accuracy of the personal data;
b) the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead; or

c) the Data Controller no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims.

Where the data processing has been restricted under the above, 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 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.

If the restriction on data management is lifted, the Data Controller shall inform you in advance.

Right to data portability:

You have the right to receive the personal data concerning you which you have provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the Data Controller to which the personal data have been provided, where:

a) data processing is based on your consent or a contract (to which you are party); and
b) the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Right to data portability shall be without prejudice to the provisions governing the right to erasure; furthermore it shall not adversely affect the rights and freedoms of others.

The framework of exercising rights:
The Data Controller shall provide information on action taken on a request based on your abovementioned rights without undue delay and in any event **within one month** of receipt of the request. This period may be, if needed, extended by further two months in the light of the complexity of the request and the number of requests to be processed. The Data Controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. If the Data Controller does not take action on your request, the Data 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 National Authority for Data Protection and Freedom of Information; in Hungarian: 'Nemzeti Adatvédelmi és Információszabadság Hatóság'; abbreviated as 'NAIH') and seeking a judicial remedy. The contact details of the NAIH (address: 1055 Budapest, Falk Miksa utca

9-11., mailing address: 1373 Budapest, PO Box 9., Tel: +36 1 391 1400, +36 (30) 683-5969 or +36 (30) 549-6838 Fax: +36-1-391-1410, email: ugyfelszolgalat@naih.hu, website: http://naih.hu/).

When your rights are breached, you may turn to court. Such litigation falls within the jurisdiction of the Regional Courts (in Hungarian: törvényszék). Proceedings may also be brought before the courts of the Member State where you have your temporary place of stay or habitual residence, as chosen by you. The court may order the Data Controller to provide the information, to rectify, restrict or erase the data in question, to annul the decision adopted by means of automated data-processing, to consider your right to object. The court may order publication of its decision, making the Data Controller or any other data controller and the committed infringement identifiable.

You shall be entitled to demand restitution for damages suffered as a result of unlawful data processing (or omission of data security measures) from the data controller liable for such damages. If the data controller infringes your personality rights by the unlawful processing of your data or the omission of data security measures, you may demand non-material damages. The data controller shall be exempt from liability if it proves that the damage or the infringement of the personality rights of the data subject was triggered by an unavoidable cause beyond the scope of data processing.
The damage will not have to be compensated and no restitution may be claimed if the damage arose as a result of the intentional or grossly negligent conduct of the party suffering the damage.