

## Privacy Policy

### *on the personal data processing activities concerning the natural person contact persons of the contracting partners and the natural person contracting parties*

The contract registration activities of **Magyar RTL Televízió Zártkörűen Működő Részvénytársaság** (registered office: 1068 Budapest, Dózsa György út 84/A; company registration number: 01-10-043422; tax number: 12254392-2-44; abbreviated name: M-RTL Zrt.) (hereinafter: Data Controller 1), **RTL Services Kft.** (registered office: 1068 Budapest, Dózsa György út 84/A; company registration number: 01-09-198899; tax number: 25085994-2-42) (hereinafter: Data Controller 2) and **R-Time Kft.** (registered office: 1068 Budapest, Dózsa György út 84/A; company registration number: 01-09-263841; tax number: 10860575-2-42) (hereinafter: Data Controller 3) involve the processing of personal data, during which a contract management system is used.

M-RTL Zrt., RTL Services Kft. and R-Time Kft. qualify as independent data controllers in the course of personal data processing activities related to their respective contracts, with the proviso that the contract management system is operated by M-RTL Zrt. Therefore, M-RTL Zrt. qualifies as a data processor with regard to RTL Services Kft. and R-Time Kft. in respect of the operation of the system managing the contracting processes of these data controllers and the registration of the contracts of these data controllers in the contract management system.

On the basis of the above, the term "Data Controller" referred to in this Privacy Policy shall mean both M-RTL Zrt., RTL Services Kft. and both R-Time Kft. as data controllers, each of them in connection with its independent data processing activities carried out in connection with its own contracts. When the role of M-RTL Zrt. as a data processor in relation to RTL Services Kft. and R-Time Kft. is relevant, this data processing notice clearly indicates.

In this current policy Data Controller intends to provide **natural contact persons of the contracting parties and the natural contracting parties as data subjects** (hereinafter referred to as: data subjects) information about the circumstances of processing personal data complying with its obligation defined in the Regulation (EU) 2016/679 of the European Parliament and of the Council on the general data protection regulation (hereinafter referred to as: GDPR).

The data protection terms used in this notice should be interpreted in accordance with the definitions provided in Article 4 of the GDPR and the concepts supplemented by Act CXII of 2011 on information self-determination and freedom of information (Privacy Act).

#### **1. Contact details of the Data Controllers and the Data Protection Officer**

##### **Contact details of Data Controller 1:**

Name of the data controller: M-RTL Zrt.

Headquarters: 1068 Budapest, Dózsa György út 84/A

E-mail: [adatvedelem@rtl.hu](mailto:adatvedelem@rtl.hu)

Contact details of the Data Protection Officer: [adatvedelem@rtl.hu](mailto:adatvedelem@rtl.hu)

**Contact details of Data Controller 2:**

Name of the data controller: RTL Services Kft.

Headquarters: 1068 Budapest, Dózsa György út 84/A

E-mail: adatvedelem@rtl.hu

Contact details of the Data Protection Officer: adatvedelem@rtl.hu

**Contact details of the Data Controller 3:**

Name of the data controller: R-Time Kft.

Headquarters: 1068 Budapest, Dózsa György út 84/A

E-mail: adatvedelem@rtl.hu

Contact details of the Data Protection Officer: adatvedelem@rtl.hu

**2. Data processing activities**

**2.1. Data processing activity: Registration activity related to contracts**

Purpose of data processing:	<p>The purpose of data processing is to perform the registration activity related to contracts.</p> <p>The contract management system enables the Data Controller to fulfil contractual obligations, to ensure legal compliance (e.g. in the case of legal disputes, the obligation to provide proof, accounting and document retention) and operational efficiency, including the electronic recording and monitoring of the preparation, opinion, approval and signing of contracts, the electronic registration of contractual documentation, the electronic management and storage of signed contracts.</p>
Legal basis of data processing:	<p>The legal basis for the processing of personal data relating to the natural person contact persons of the contracted partners is Article 6(1)(f) of the GDPR, according to which the processing is necessary for the enforcement of the legitimate interests of the data controller.</p> <p>The Data Controller has a legitimate interest in the efficient and secure management of contracts and the electronic registration of contracts.</p> <p>Pursuant to Article 21(1) of the GDPR, the data subject has the right to object at any time to the processing of his or her personal data on the basis of legitimate interest on grounds relating to his or her particular situation. If the data subject exercises his or her right to object, the Data Controller may no longer process the personal data, unless the Data Controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests,</p>

	<p>rights and freedoms of the data subject, or that are related to the submission, exercise or defence of legal claims.</p> <p>The data subject may exercise his or her right of objection by sending an email to the adatvedelem@rtl.hu email address.</p> <p>The legal basis for the processing of personal data concerning natural person contracting parties is Article 6(1)(b) of the GDPR, according to which the processing is necessary for the conclusion and performance of a contract with the data subject, and in certain cases the fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR (e.g. accounting rules, tax obligations).</p>
<p>Scope and source of processed personal data:</p>	<p>In the case of contact persons of the contracting parties:</p> <ul style="list-style-type: none"> <li>a) name;</li> <li>b) position;</li> <li>c) Contact information (email address, phone number);</li> <li>d) the name of the partner company represented.</li> </ul> <p>In the case of natural person contracting parties:</p> <ul style="list-style-type: none"> <li>a) name;</li> <li>b) address, contact details;</li> <li>c) other personal data necessary for the conclusion of the contract;</li> <li>d) the measures taken by the data subject during the contracting process (e.g. the fact, date of the opinion, the time of the approval of the respondent);</li> <li>e) the fact and date of signing, if data subject signed the contract by hand, then the signature of data subject;</li> <li>f) other information about the data subject based on the content of the contract.</li> </ul> <p>The personal data relating to the natural person contact persons of the contracting partners shall be made available to the Data Controller by the contracting partner. The personal data of the natural person contracting party originate from the data subject or are generated during the contract process.</p>

Duration of data processing:	The Data Controller processes the personal data in the contract management system together with the contractual documentation for the duration of the retention period of the given contract, taking into account the limitation period of the related legal claims (5 years from the termination of the contract) and, in the case of accounting retention obligations, also for the duration thereof (8 years after the year of termination/expiry of the contract), and if legal proceedings have been initiated, until the final or final conclusion of this procedure. After the expiry of this period, contractual documentation and all personal data processed in connection with it will be deleted.
Recipients and persons entitled to access the data:	<p>Personal data can be accessed by those who are entitled or obliged to participate in personal data processing activities due to their job, and who are entitled to control this.</p> <p>Data transfer from the contract management system to third parties is not carried out, however, personal data related to contracts may be transferred to the competent authority or court in case of a legal obligation or the need to enforce a legal claim.</p> <p>In the case of the contracts of RTL Services Kft. and R-Time Kft., M-RTL Zrt., the operator of the contract management system, participates in the personal data processing as a data processor during the contracting process and the registration of the contracts. M-RTL Zrt. involves PricewaterhouseCoopers Hungary Kft. (1055 Budapest, Bajcsy-Zsilinszky út 78.) in the operation and maintenance of the contract management system. PricewaterhouseCoopers Hungary Kft. is considered a data processor for M-RTL Zrt. and a sub-processor for RTL Services Kft. and R-Time Kft.</p>

### 3. Data processor used for data processing

RTL Services Kft. and R-Time Kft. engage M-RTL Zrt. as a data processor for the operation of the contract management system, while M-RTL Zrt. involves PricewaterhouseCoopers Hungary Kft. (1055 Budapest, Bajcsy-Zsilinszky út 78.) in the operation and maintenance of the contract management system. PricewaterhouseCoopers Hungary Kft. is considered a data processor for M-RTL Zrt. and a sub-processor for RTL Services Kft. and R-Time Kft.

In the course of the data processing activities carried out by the data processor, the data processor shall act in accordance with the instructions given by the data controller and shall provide an adequate guarantee for compliance with the legal requirements for data processing, as well as for the

implementation of appropriate technical and organisational measures ensuring the protection of the rights of the data subjects.

#### **4. Security**

The Data Controller shall ensure the security of the data with the measures it may take within its own competence, and shall implement appropriate technical and organizational measures to ensure that the processing of personal data is carried out in accordance with the applicable legislation, thus taking all measures to protect the processed personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to the personal data. unauthorized access, accidental destruction and damage. The Data Controller ensures that only authorized persons have access to the personal data .

With regard to the contract management system, M-RTL Zrt. ensures the appropriate protection of the personal data stored in the contract management system in the course of operation and maintenance of each data controller.

#### **5. Data subject rights and legal remedies**

The data subject is entitled at any time to submit a request to the Data Controller in connection with the exercise of his/her rights related to the data processing activity contained in this privacy policy. The request of data subject shall be fulfilled without undue delay, but in any case within one month from the receipt of the request, unless the deadline needs to be extended by another two months due to the complexity of the request or the number of requests. The data subject will be informed about the extension of the deadline, indicating the reasons for the delay, within one month of receiving the request by the Data Controller.

Data subject shall have the right:

##### **a) to be informed about data processing and to access to the processed personal data**

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- personal data which are being processed;
- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;

- the existence of automated decision-making, including profiling, 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.

**b) to rectification of personal data.**

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**c) to erasure of personal data.**

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- the data subject objects to the processing pursuant to Article 21 (1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21 (2) of the GDPR;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

**d) to restriction of processing.**

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing pursuant to Article 21 (1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

**e) to data portability.**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable

format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or on a contract and the processing is carried out by automated means.

**f) to object to the data processing.**

The data subject has the right to object at any time to the processing of their personal data based on legitimate interests under Article 6(1)(f) of the GDPR, for reasons related to their particular situation. In this case, the data controller may no longer process the personal data, unless it demonstrates that the processing is justified by compelling legitimate grounds that override the interests, rights, and freedoms of the data subject, or that are related to the establishment, exercise, or defense of legal claims.

No automated decision-making, including profiling, takes place regarding the processing of personal data included in this privacy policy.

**Legal remedies**

If the data subject considers the processing of his or her personal data to be injurious, we recommend that he or she first contact the Data Controller or the Data Protection Officer at any of the contact details indicated in this Privacy Notice. In all cases, we investigate the complaint of the person concerned and take the necessary measures to remedy the complaint. If, in spite of this, the injury of the data subject persists or he does not wish to file a complaint, he or she may seek the following legal remedies:

**a) Right to lodge a complaint with a supervisory authority:**

The data subject shall have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information if the data controller or the data processor commissioned by him or her has committed an infringement or caused a threat thereof through the activities or omissions of the data controller or the data processor commissioned by him/her.

**Contact details of the National Authority for Data Protection and Freedom of Information:**

Headquarters: 1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf. 9.

Phone number: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Website: <https://naih.hu/>

E-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

**b) Right to judicial remedy:**

If the data subject considers that his or her rights related to the processing of personal data have been violated, he or she is entitled to an effective judicial remedy, without prejudice to the available administrative or non-judicial remedies, including the right to lodge a complaint with a supervisory authority. In this case, the data subject may, at his or her choice, bring the matter before the competent

court of his or her domicile or place of residence. The list of courts can be accessed by the data subject on the following website:

<https://birosag.hu/ugyfeleknek/birosagok/torvenyszekek>

This Privacy Policy is effective from 06 August 2025.