

INFORMATION ON DATA CONTROLLING IN CONNECTION WITH OFFERS

In order to deliver its services and offers to their recipients through advertising and providing offers, Yettel Magyarország Zrt. (Yettel Hungary Ltd.; registered office: H-2045 Törökbálint, Pannon út 1, company registration number: 13-10-040409; hereinafter referred to as "Yettel") controls the personal data of natural persons identified or identifiable using personal data (hereinafter referred to as "data subjects") in accordance with the terms and conditions described below. This information document provides a detailed description of the provisions of Section 11 of Annex 2 of the General Terms and Conditions (hereinafter referred to as "GTC"). Entered into the Data Protection Registry under NAIH 52098/2012.

I. Conducting activities

1) Legal background

In conducting its activities, Yettel, as Data Controller, ensures that the rights granted by the following Acts are enforced and the requirements for controlling the personal data of data subjects are met:

- Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter referred to as the "Info Act");
- Act C of 2003 on Electronic Communications;
- Act XLVIII of 2008 on the essential conditions of and certain limitations on business advertising;
- Act CXIX of 1995 on the use of name and address information for purposes of research and direct marketing;
- Act CVIII of 2001 on certain issues of electronic commerce services and information society-related services (hereinafter referred to as the "E-commerce Act").

2) Rules for conducting the activities; legal basis of data controlling

In case the data subject has given consent to, Yettel provides information on its services, offers and promotions in order to keep the data subject up-to-date with relevant Yettel services, promotions and customised offers. When facilitating the sale of its products and services or, in connection with this, pursuing activities aimed at promoting the company, Yettel controls personal data specified in Section II.1) as described below and ensures that the materials sent to data subjects during these activities contain the information required by the E-commerce Act (e.g. the nature of the electronic advertising and the identity of the sender). With the consent of the data subject, Yettel may analyse the Data Subject's usage pattern (e.g. the time, duration and location of the use of the service and aggregate data about which sub-pages visitors to the Operator's website view most frequently) using its IT systems, i.e. without human intervention, before sending offers and advertisements, in order to take usage patterns and needs into consideration when developing services and customised offers. During this activity, Yettel implements various organisational and technical measures in compliance with the applicable legal requirements to secure data controlling (e.g., pursuant to Section 7 of the Info Act, it ensures that systems can be restored in case of a breakdown). Yettel may also contact the data subject by phone or by using other electronic communication methods, automatic calling and messaging systems (e.g. SMS, MMS, e-mail) or by post.

The data subject may withdraw or change their consent free of charge at any time.

This information document does not cover information that needs to be provided in the interest of the data subject, including useful or technical information about the use of a service, maintenance messages, security warnings or other information concerning existing subscriptions (e.g. new payment arrangements, bandwidth increase, etc.) and communications containing information about essential elements of the subscriber's legal relationship with the operator.

II. The scope of personal data; the purpose of data controlling

1) The scope of controlled data

- a) name and permanent or temporary address of the data subject;
- b) sex and age of the data subject;
- c) e-mail address of the data subject;
- d) phone number(s) of the data subject;
- e) subscription data of the data subject;
- f) traffic data of the data subject;
- g) The data subject's usage data regarding various services (e.g. web content accessed, time and duration of the access);
- h) geographical positioning data of the data subject; and
- i) other data specified in Section 11 of Annex 2 of the GTC.

2) The purpose of data controlling:

- a) identifying and maintaining contact with the data subjects;
- b) assessing the data subjects' needs;
- c) offering Yettel's services;
- d) making customised offers;
- e) advertising;
- f) taking advantage of opportunities presented by services;
- g) improving user experience.

III. Duration of personal data controlling

Yettel controls the data until the data subject's consent is withdrawn or the Subscriber's legal relationship with the operator is terminated, unless otherwise provided for by the Subscriber.

IV. The method of storing personal data

Yettel stores data as hard copy, as an electronic copy of the document or in electronic form, depending on how the data were created.

V. Cases when personal data may be released:

1) Pursuant to Section 10 of the Info Act, data specified in Section II.1) herein may be released

to those appointed by Yettel to perform data processing activities under a separate contract. With regard to the data provided as described above, the recipients are under the same obligations, including the obligation of confidentiality, as Yettel.

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2) Pursuant to Section 5 (1) of the Info Act, data specified in Section II.1) herein may be released

upon the consent of the data subject to Yettel's contractual partners acting as Data Controllers in order to allow third parties to contact the data subject about their special offers or for public opinion polling or market research. The recipients are under the same obligation of confidentiality as Yettel.

VI. The data subject's rights

1) The right to information, rectification, deletion and blocking

Pursuant to Sections 14 to 18 of the Info Act, the data subject may request

- a) information about;
 - b) the rectification of;
 - c) or the deletion or blocking of their personal data controlled by Yettel.
- a) The data subject may request Yettel at any time to provide information about how it controls data, including in particular the purpose and legal basis of the data controlling or the person performing data processing.
 - b) The data subject may request rectification of its personal data if the controlled data are inaccurate.
 - c) Yettel deletes the personal data of the data subject if:
 - data are controlled unlawfully;
 - the data subject requests such data to be deleted;
 - the data subject's personal data are incomplete or inaccurate and this condition cannot be lawfully rectified, provided that deletion is not prohibited by law;
 - the purpose of data controlling no longer exists;
 - ordered by court or the Hungarian National Authority for Data Protection and Freedom of Information.

The data subject's request for deletion may concern only the data which are controlled on the basis of their consent, and may not concern any data controlled according to the mandatory data controlling prescribed by law. In accordance with Section 6 of the Info Act, Yettel is still entitled to control the data subject's personal data after the request for deletion if controlling the data subject's data is necessary for compliance with a legal obligation pertaining to Yettel as the data controller or for the purposes of the legitimate interests pursued by Yettel as the data controller.

Instead of deletion, the data subject may request their personal data to be blocked. In the event of blocking, the data subject's personal data are marked with a special ID tag that restricts their further controlling permanently or for a definite period of time.

Data subjects may send their request by e-mail to adatvedelem@yettel.hu, by fax to +36 1 464 61 11 or by post to H-2045 Törökbálint, Pannon út 1, Hungary, or submit it to the customer service by calling 1220.

In accordance with the Info Act, Yettel will perform the data subject's request in writing, without any delay but within no more than 30 days as of the

receipt of the request. Once a year, the data subject may request information free of charge about the data controlling. Should the data subject again request information with respect to the same scope of data in the same year, Yettel shall be entitled to ask for the reimbursement of its costs (HUF 5000/audio recording, HUF 15/sheet). Yettel will refund the costs paid by the data subject if their personal data are rectified or deleted, or if so required by the Info Act.

If Yettel finds that the data subject's request is unsubstantiated and therefore refuses to perform it, Yettel will notify the data subject of the factual and legal reasons thereof in writing within 30 days of receipt of the request. In this case, Yettel will also inform the data subject in writing how to seek remedy.

2) The right to object

Pursuant to Section 21 (1) of the Info Act, the data subjects may object to the controlling of their personal data if the controlling or transmission of their personal data is necessary only for compliance with a legal obligation pertaining to the Data Controller or for the purposes of the legal interests pursued by the Data Controller or a third party (except for mandatory data controlling), or if their personal data are used or transmitted for making direct offers, public opinion polling or scientific research purposes.

Yettel examines the objection without any delay, but within no more than 15 days as of the submission of the data subject's request and informs the data subject in writing of its decision on whether the objection is justified or not. If Yettel finds that the data subject's objection is justified, it will cease to control the Subscriber's data (including any further data collection or data transmission), will block such data and notify the objection and the measures taken on the basis thereof to all those to whom it transmitted the personal data related to the objection, and such persons must take measures to enforce the right to object.

VII. Remedies available to the data subject

If the data subject's request is refused by Yettel, the data subject shall be entitled, in accordance with the Info Act, to lodge a complaint in this respect with the National Authority for Data Protection and Freedom of Information (address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c, Hungary; e-mail: ugyfelszolgalat@naih.hu) or turn to the court having competence on the basis of the data subject's permanent or temporary address. If the data subject does not accept Yettel's decision made about the objection in accordance with Section VI.2) hereof, or Yettel fails to make a decision within the 15-day period, the data subject may turn to the competent court, based on their permanent or temporary address, within 30 days from the day the decision is issued or the last day of the aforementioned period.

VIII. Data Protection Officer:

Position and contact information of Yettel's internal Data Protection Officer:
 dr. Orsolya Bényi
 Head of Legal; Legal and Assurance Department
 Phone: +36 20 930 4000
 Fax: +36 1 464 6700

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