



Privacy Notice

for K&H+ Parking Service

Effective date: 26 July 2024

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The K&H+ parking service is provided by K&H Csoportszolgáltató Központ Kft. (hereinafter: KHCSK) through Kereskedelmi és Hitelbank Zrt. (hereinafter: the Bank). KHCSK is a single-person limited liability company established by the Bank. The Bank has a controlling interest in KHCSK in the sense of the definition mentioned in Article 6 (1) 18 of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (hereinafter: Htp.).

For the provision of the parking service, the Bank uses a third party (EPS Global Zrt., registered seat: 1119 Budapest, Bornemissza tér 12/C) as a service provider and parking system operator.

The provision of the service involves the processing of personal data, which is performed by KHCSK and the Bank as joint data processors.

The joint data processing involving the mutual transfer of personal data is mandated by Article 164/B of Htp. based on the controlling interest between the companies. Under this legal regulation the Bank and its controlled subsidiary KHCSK are exempt from keeping bank secrets, including personal data, from each other in the context of cooperating in the facilitation of clients' access to cashless digital payment services, when the data processing is related to the creation of client relationships connected to this activity.



In the context of providing the K&H+ service, KHCSK acts as a re-seller for Nemzeti Mobilfizetési Zrt. (principal place of business: 1021 Budapest, Kapás utca 6-12, hereinafter: NM Zrt.), the designated national payment services provider as mentioned in Article 2 (1) of Government Decree 356/2012 (XII. 13.) on the implementation of the Act on the national payment system. NM Zrt. is standalone data processor (<https://nmzrt.hu/egyeb-informaciok/adatvedelem>).

KHCSK and the Bank provide the following information regarding their joint data processing activity:

DATA PROCESSING

1. The K&H+ service

Legal justification	Article 6 (1) b) of the GDPR
Timescale of data processing	the validity period of the product (parking)
Timescale of data retention	8 years for concluded contracts (based on Article 169 of Act C of 2000 on Accounting) 5 years for non-concluded contracts (based on Article 6 (1) f) of the GDPR and in accordance with Article 6:22 of the Civil Code)
Categories of personal data	basic data (basic identification and contact data, other personal identification data), data on financial products and services, data on nonfinancial products and services, location data

2. Convenience services

The purpose of the data processor's data processing based on its legitimate interest (sections 2.2 and 2.3) is to ensure the user-friendly operation of the K&H+ service.

In this context the Data Subject may enter data in the K&H mobile banking application, which data the data processor retains in order for the Data Subject not to be required to re-enter on the occasion of each purchase; the data processor also provides the Data Subject with account histories.

2.1 Managing location data (GPS coordinates), determining the parking zone based on GPS data

Legal basis	Article 6(1)(a) of the GDPR
Time/Duration of data processing	the moment when the product (parking ticket) is validated
Retention period	data controllers do not store data subjects' location data in their databases; these data are only used in the mobilbank application on the data subject's mobile device provided that the data subject has consented to mobilbank accessing the location data of their device
Personal data categories	basic data (basic identification and contact details), location data

2.2 Displaying invoices

Legal basis	Article 6(1)(f) of the GDPR
Time/Duration of data processing	one year after the end of the tax year in which the invoice is issued
Retention period	-
Personal data categories	basic identification and contact details, data relating to non-financial products or services

3. Complaints handling

Legal basis	Article 6(1)(c) of the GDPR
Time/Duration of data processing	until the complaint is closed
Relevant retention period	5 years (Section 288 of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises)
Personal data categories	basic identification and contact details, data relating to non-financial products or services

RECIPIENTS OF DATA TRANSFERS

NM Zrt.

K&H Service Center transfers data to NM Zrt. when a product is purchased and, if the Data Subject files a complaint, it may transfer further data to NM Zrt. to find a solution.

Legal basis	Article 6(1)(b) of the GDPR
Time/Duration of data processing	when the product is purchased
Relevant retention period	5 years (under Section 6:22 of the Civil Code, based on Article 6(1)(f) of the GDPR)
Personal data categories	data relating to non-financial products or services

Legal basis	Article 6 (1)(c) of the GDPR
Time/Duration of data processing	until the complaint is closed
Relevant retention period	5 years (Section 288 of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises)



Personal data categories	data relating to non-financial products or services, data relating to financial products or services
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National Tax and Customs Administration (Széchenyi u. 2, Budapest, H-1054)

Legal basis	Article 6(1)(c) of the GDPR (Annex 10 to Act CXXVII of 2007 on Value Added Tax)
Time/Duration of data processing	4 days from the date when the invoice is issued
Relevant retention period	5 years (Section 78(3) of Act CL of 2017)
Personal data categories	invoice details

EPS Global Zrt. (1119 Budapest, Bornemissza tér 12/C)

Legal basis	Section 6:22 of the Civil Code, based on Article 6(1)(f) of the GDPR
Time/Duration of data processing	when the product (parking ticket) is purchased
Relevant retention period	5 years (under Section 6:22 of the Civil Code, based on Article 6(1)(f) of the GDPR)
Personal data categories	Registration plate number, CMDB identifier

DATA SUBJECTS' RIGHTS AND REMEDY OPTION

Data Subjects have the right to object to transferring their data between the Bank and K&H Service Center operating under its direct control. Data Subjects can make a statement forbidding the transfer of their data using any contacts of the Bank or K&H Service Center, and also in their K&H mobilbank and K&H e-bank applications.

As a consequence of objecting to transferring their data, Data Subjects may no longer use the services provided by K&H Service Center because the transmission of data and their joint processing are preconditions to using those services.

For more information on further rights and remedies related to data processing, please visit our general data processing information page at www.kh.hu/adatvedelem.