

Data Processing Notice

Prepared by:

2025. 12. 01.



Gergely Tolnay

Responsible for Data Protection

Approved by:

2025. 12. 01.



Balázs Zeher

Managing Director II.

ADR Logistics Kft. is committed to fully respecting its customers' rights relating to data processing, and to process personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: GDPR or General Data Protection Regulation) and Act CXII of 2011 on the right to self-determination and freedom of information (hereinafter: Infotv.).

Data controller's details and contact information

ADR Logistics Kft.

Managing Director: Balázs Zeher

Data Protection Officer (DPO): Gergely Tolnay

Registered office: 2360 Gyál, Gorcsev Iván utca 5.

Camera surveillance locations:

2360 Gyál, Gorcsev Iván utca 5.

2360 Gyál, Gorcsev Iván utca 1.

2040 Budaörs, Vasút Street 13.

Company registration number: 13-09-119071

Telephone: +36 20 771-7650 Email: info@adr-logistics.hu

Purpose and duration of data processing

1. ADR Logistics Kft. treats the recordings made by the security cameras it has installed and operates as personal data. The camera system is used exclusively for the protection of human life, physical integrity, personal freedom and property, and for the prevention and detection of illegal activities. The recordings are stored by the company for a maximum of thirty days, or in the case of cameras temporarily installed in the loading area of transport vehicles for the duration of loading, for a maximum of one hundred and twenty days, in accordance with the balancing of interests test. The persons authorised to access the data are the management of ADR Logistics Kft., which may use the recordings exclusively for the protection of human life, physical integrity and personal freedom, the prevention and detection of unlawful acts, and the protection of property.

2. ADR Logistics Kft. processes the personal data of its partners (suppliers, clients) and the clients' customers for the purpose of maintaining contact. In the case of partners contracted by the Data Controller, the Data Controller processes the name, email address and telephone number of the partner's contact person. In the case of clients' customers, the Data Controller processes the name, email address, telephone number and address of the natural person. The legal basis for data processing is Article 6(1)(b) of the GDPR, i.e. data processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. ADR Logistics Kft. processes the data of natural persons until the performance of the contract, after which the personal data are deleted. The Data Controller does not transfer personal data to third countries or international organisations. The Data Controller does not use a data processor.

3. ADR Logistics Kft. processes the names and telephone numbers of drivers of goods vehicles and natural persons receiving goods for the purpose of identifying goods vehicles and recipients of goods. The legal basis for data processing is Article 6(1)(b) of the GDPR, i.e. data processing is necessary for the performance of a contract to which the data subject

is party or in order to take steps at the request of the data subject prior to entering into a contract. In the event that the Data Controller transports so-called dangerous goods by truck, the legal basis for data processing shall be Article 6(1)(c) of the GDPR, i.e. data processing is necessary for compliance with a legal obligation to which the Data Controller is subject. Given that the delivery note is considered equivalent to an invoice, the Data Controller must take into account Section 169(2) of Act C of 2000 on Accounting, according to which accounting documents must be retained for at least 8 years. Thus, the duration of data processing is 8 years, which is in line with Section 169(2) of Act C of 2000 on Accounting. If the personal data processed (name, telephone number) are recorded on the delivery note, they may be accessed by the driver of the truck and the subcontractor involved in the transport. The Data Controller does not transfer personal data to third countries or international organisations. The Data Controller does not use a data processor.

Rights of data subjects and conditions for their enforcement

Chapter III of the GDPR sets out the rights of data subjects. You may request **the rectification** (Article 16 of the GDPR), **restriction** (Article 18 of the GDPR) or **erasure** (Article 17 of the GDPR) of your data at any time, and you may also request **comprehensive and specific information** about the processing of your data (Article 15 of the GDPR).

At the request of the data subject, ADR Logistics Kft., as the data controller, shall provide information on the data processed by it or by the data processor commissioned by it, the source of the data, the purpose of the data processing, the legal basis, the duration, the name and address of the data processor and its activities related to data processing, and - in the case of transfer of the data subject's personal data - the legal basis and recipient of the data transfer. The data controller shall respond to the data subject's request without undue delay, but within one month at the latest. If necessary, taking into account the complexity of the request and the number of requests, this period may be extended by a further two months. The data controller shall inform the data subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay. If the data subject has submitted the request electronically, the information shall be provided electronically, unless the data subject requests otherwise. The information shall be provided free of charge if the person requesting the information has not yet submitted a request for information to the data controller in the current year concerning the same data set. In other cases, a fee may be charged. If the data controller does not take action on the data subject's request, it shall inform the data subject without delay, but no later than one month after receipt of the request, of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority (National Authority for Data Protection and Freedom of Information, hereinafter: Authority), and that they have the right to seek judicial remedy. If the personal data is inaccurate and the data controller has access to accurate personal data, the data controller shall rectify the personal data. Personal data shall be erased if its processing is unlawful; the data subject requests it (except in the case of mandatory data processing); it is incomplete or incorrect and this situation cannot be remedied lawfully, provided that the deletion is not excluded by law; the purpose of the data processing has ceased to exist or the statutory time limit for the storage of the data has expired; it has been ordered by a court or the Authority. Instead of erasure, the data controller shall block the personal data if the data subject so requests or if, based on the information available, it can be assumed that erasure would prejudice the legitimate interests of the data subject. Personal data blocked in this way may only be processed for as long as the purpose of the processing that precluded the erasure of the personal data exists.

The data controller shall mark the personal data it processes if the data subject disputes its correctness or accuracy, but the incorrectness or inaccuracy of the disputed personal data cannot be clearly established. The data subject shall be notified of the rectification, blocking or erasure. The notification may be omitted if it does not prejudice the legitimate interests of the data subject in view of the purpose of the data processing. If the data controller does not comply with the data subject's request for rectification, blocking or erasure, it shall communicate in writing the factual and legal reasons for the refusal of the request for rectification, blocking or erasure within one month of receipt of the request. In the event of a refusal of a request for rectification, erasure or blocking, the data controller shall inform the data subject of the possibility of judicial remedy and of the possibility of appealing to the Authority.

The data controller shall examine the objection within the shortest possible time after the submission of the request, but within a maximum of 15 days, decide on its merits and inform the applicant in writing of its decision. If the data controller finds that the objection of the data subject is well-founded, it shall terminate the data processing, including further data collection and data transfer, and shall block the data, and shall notify all those to whom it has previously transferred the personal data concerned by the objection and who are obliged to take measures to enforce the right to object. If the data subject disagrees with the decision taken by the data controller, or if the data controller fails to meet the deadline prescribed by law, the data subject may appeal to the court within 30 days of the notification of the decision or the last day of the deadline. The data controller may also sue the data subject. The data controller may not delete the data subject's data if the data processing is required by law. However, the data may not be transferred to the data recipient if the data controller has agreed to the objection or if the court has found the objection to be justified.

If you feel that ADR Logistics Kft. has violated the law in the course of data processing, please notify our Data Protection Officer or, in the event of a violation of your rights, you may initiate an investigation with the National Authority for Data Protection and Freedom of Information (NAIH) on the grounds that your personal data has been infringed or is at direct risk of being infringed, but we would be grateful if you would first contact us with your complaint so that we can investigate and remedy it as soon as possible. You may also take legal action against the data controller. The court will deal with the case as a matter of priority. The data controller shall compensate any damage caused to others by the unlawful processing of the data subject's data or by a breach of data security requirements. The data controller shall be exempt from liability if it proves that the damage was caused by an unavoidable reason outside the scope of data processing. No compensation shall be paid for damage caused by the intentional or grossly negligent conduct of the injured party. The data subject may object to the processing of their personal data, except in cases where data processing is required by law, and may lodge a complaint with ADR Logistics Kft. against incorrect data processing. The objection or complaint does not affect the data subject's other rights regulated by data protection legislation.

The data protection officer (DPO) shall assist in the assessment of the complaint. The data subject may lodge a complaint with

- to the DPO of ADR Logistics Kft.
- NAIH, contact details:
 - registered office: 1055 Budapest, Falk Miksa utca 9-11.
 - Postal address: 1363 Budapest, Pf.: 9,
 - e-mail: ugyfelszolgalat@naih.hu
 - Website: naih.hu.
- You may turn to the court