

# Privacy Notice

## General and wigo fleet related data processing

Effective from 2025.02.03.

Version number: 1.1

## 1. Introduction

**Nelson Flottalízing Kft.**, a member of the AutoWallis Group, as the data controller (hereinafter referred to as the "**Controller**") is committed to the safeguarding and protecting the rights of its customers and all persons who have contact with it (hereinafter referred to as the "**Data Subject**") in relation to personal data.

As a mobility service provider, we offer car sharing under the name **wigo carsharing** and the corporate fleet management under the name **wigo fleet**. For the sake of transparency, we have prepared separate privacy notices for these two services and for our **general data processing**.

In this notice (the "**Notice**"), we set out the details of the data processing practices in relation to **general and wigo fleet related data processing**. You can access the document describing the wigo carsharing service on our website.

Please note that the information in this Notice only applies to data relating to natural persons.

### 1.1. Data controller and contact details

Name: Nelson Flottalízing Kft.  
Registered office: 1033 Budapest, Kórház utca 6-12.  
Registration number: 01-09-378396  
  
Phone number: +36 1 444 7777  
E-mail address: adatvedelem@wigo-mobility.com

### 1.2. Data Protection Officer and contact details

The Data Controller, together with other companies belonging to the AutoWallis group, employs a joint data protection officer under the authorisation of Article 37(2) GDPR.

E-mail address: adatvedelem@wigo-mobility.com

### 1.3. Purpose of the Notice

The purpose of this Notice is to answer the following questions.

- what personal data we collect about you when we process your personal data,
- for what purpose and on what legal basis we do this,
- how long the personal data is stored,
- if we transfer them to someone else,
- what rights and remedies you have in relation to the processing.

### 1.4. General rules on data processing

#### Source of data

Personal data is typically obtained directly from the data subject. If we obtain your personal data through other means, we will inform you of the details of this in the specific section.

#### Transfers to third countries

As a matter of general business practice, we also use service providers reside outside the EEA. Due to the third country headquarters, personal data processed in these services could in some cases be transferred

outside the EEA. For example, in the case of Microsoft's office software or our Facebook page, to the USA. We monitor the adequacy of these services and services from a data protection perspective on an ongoing basis. For example, whether these service providers are registered under the EU-US data protection framework. In order to comply with our own data protection policies and procedures, we only engage with service providers that can demonstrate a proven commitment to data protection compliance.

### Profiling or automatic decision-making

We do not typically use profiling or automated decision-making in our data processing. If we do, we will inform you of the details of this in the specific section.

### Data processors

Our subcontractors who may have access to personal data are contractually guaranteed to comply with our instructions on data processing and the applicable data protection standards.

## 2. 2. Description of each processing operation

Please find details of the data processing operations outlined below:

- 2.1. General contact
- 2.2. Preparation and performance of the contract
  - 2.2.1. Contract conclusion in the case of individual enterprises
  - 2.2.2. Consumer guarantees supplementing a framework contract
- 2.3. Marketing activities and sending newsletters
- 2.4. Social media
- 2.5. Data processing of service providers' employees
- 2.6. Data processing related to job applications and recruitment
- 2.7 Processing resumes as evidence against discrimination
- 2.8. Data subjects' requests
- 2.9 Data processing in relation to cameras

### 2.1. General communication and contacts

#### Purpose and legal basis for data processing

The purpose of data processing is general communication about issues related to our services and sales activities. This includes answering and handling all enquiries relating to the operation of our business and technical information. The legal basis for processing - Article 6 (1) (f) GDPR - is the legitimate interest of the Data Controller to maintain contact.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

#### Categories of the data processed

- Name (identification data)
- Email address / mailing address / telephone number (contact data)
- Other personal data provided in the request

#### Retention time

The data will be kept for five (5) years from the last contact or until the successful objection.

#### Data processors

- IT service provider
- Hosting service provider
- Social media provider
- Call center service provider

## 2.2. Preparation and performance of the contract

### 2.2.1. Contract conclusion in the case of individual enterprises

#### Purpose and legal basis for data processing

If you enter into a contract with us as an individual entrepreneur or use our fleet management service, we will process your personal data for the purpose of preparing and fulfilling the contract. Legal basis for processing is the performance of a contract between the Data Controller and the Data Subject. - Article 6(1)(b) GDPR.

#### Categories of the data processed

- Name
- Registration number
- Tax number

Please be advised that the provision of personal data is a prerequisite for the conclusion of the contract. Without this information, we are unable to provide you with our service.

#### Retention time

The data will be processed within the general legal limitation period (5 years) following the termination of the contractual relationship, after which it will be deleted.

#### Data processors

- Server provider
- E-mail service provider

### 2.2.2. Consumer guarantees supplementing a framework contract

#### Purpose and legal basis for data processing

When individuals provide a guarantee as part of the performance of a contract as a supplement to a framework contract, we also process the personal data relating to that guarantee. Legal basis for processing is the performance of a contract between the Data Controller and the Data Subject. - Article 6(1)(b) GDPR.

#### Categories of the data processed

- Name
- Mother's name
- Place and date of birth
- Nationality
- Telephone number
- E-mail address
- Address
- Identity card number
- Tax number

- Identification number
- Ownership of the property, its parcel number, estimated value
- Bank account numbers
- Amount of savings
- Type of employment
- Name and address of employer, contact details
- Net monthly income
- Monthly income per capita
- Other certified income
- Amount of monthly repayments
- Other securities owned, shares, insurance, major movable property
- Other guarantees given

Please be advised that the provision of personal data is a prerequisite for the conclusion of the contract. Without this information, we are unable to provide you with our wigo fleet service.

#### Retention time

In the case of a concluded contract, five (5) years after the termination of the contract. If no contract is concluded after the data is provided, within 30 days from the failure to conclude the contract.

#### Data processors

- Server provider
- E-mail service provider

### 2.3. Marketing activities and sending newsletters

For information on the data processing related to the marketing and newsletter activities of the Data Controller, please refer to the [Privacy Notice](#) of the wigo carsharing service.

### 2.4. Social media

#### Purpose and legal basis for data processing

Social media is one of the most important communication platforms today. We are present on these platforms to share breaking news, events and promotions, as well as to engage with our followers to build community, respond to their questions and support them in other ways. Social media also gives us the opportunity to run targeted marketing campaigns and market research activities to help us improve our services.

In this context, we process the personal data of data subjects for the purposes of maintaining our social media presence, promoting our services, and communicating and marketing through the Sites. Legal basis for processing is the consent of the Data Subject- Article 6(1)(a) GDPR.

You can withdraw your consent at any time, in which case your data will be deleted and will no longer be processed for this purpose. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to the withdrawal.

#### Categories of the data processed

- View a page, post, video, story, or other content associated with the page
- Actions and interactions related to the story, page, post (follow, like, share, comment)
- Details of the action or interaction (date and time, location, browser data)
- User ID

### Source of personal data

- Data Subject
- The specific social media site (Facebook etc.)

### Retention time

We will process your data for the duration of our presence on social media platforms or until you request their deletion or withdraw your consent.

### Data processors

- Server provider
- Marketing agency
- The social media site (For example: Facebook, Instagram, TikTok, LinkedIn, YouTube, X)

### Recipient of the data transfer

AutoWallis Nyrt.

### Profiling or automatic decision-making

In the course of marketing activities, the social media service provider independently creates target groups based on the advertising settings. The members of the target groups cannot be accessed or changed directly by the site owner (Data Controller). The data subject may decide not to allow targeted advertising activities when using social media.

## 2.5. Data processing of service providers' employees

### Purpose and legal basis for data processing

We process the personal data of employees of our contracted partners and our affiliated companies in order to maintain contact and cooperation with them. The legal basis for data processing - GDPR Article 6(1)(f) - is the legitimate interest of the Data Controller in maintaining contact with the contractual partner.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

### Categories of the data processed

- Name
- Contact details: e-mail address, telephone number
- Company name, position
- Content of communications and meetings.
- Dates and other administrative information.

### Source of personal data

The data are provided by the employer of the contact person, the contractual partner.

### Retention time

The duration of the contractual relationship or the relevant period of contact, up to the retention period of the document (e.g. invoices are stored in Hungary for 8 years, contracts for 5 years).

### Data processors

- Server provider

### Recipients of data transfers

AutoWallis Nyrt.

## 2.6. Data processing related to job applications and recruitment

### Purpose and legal basis for data processing

In the case of an application for a job advertised by the Data Controller, we process personal data for the purposes of conducting the selection process, inviting the applicant for an interview, assessing compliance with the conditions, conducting the recruitment process and filling the position. Legal basis for data processing - GDPR Article 6 (1) (f) – is the Data Controller's legitimate interest in recruiting staff.

If the Data Subject also provides specific personal data in connection with his/her application, the processing is also based on the Applicant's voluntary, explicit and informed consent pursuant to Article 9(2)(a) of the GDPR.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

### Categories of the data processed

- Basic information: name, e-mail address, telephone number.
- Identifying data: place of birth, date, photo.
- Data required for selection: CV, references, certificates, identity cards.
- Other data provided: any additional personal information voluntarily provided by the data subject.

### Source of the personal data

- Data subject (the data subject decides on the disclosure and scope of the data in the application).
- Headhunter
- Job portal

### Retention time

The data will be processed during the selection process.

In case the candidate is not selected, we will process the data for a maximum of one (1) additional year, based on the specific consent of the data subject, in order to contact him/her as a potential candidate for a possible future employment.

### Data processors

- IT service provider
- Server provider
- Headhunter
- Job portal

### Recipients of data transfers

AutoWallis Nyrt.

## 2.7 Processing resumes as evidence against discrimination

### Purpose and legal basis for data processing

At the end of the recruitment process, we will not discard any resumes of applicants who have not been successful in the recruitment process. The purpose of the processing is to enable the Data Controller to document and prove that there was no discrimination during the selection process. Legal basis for processing - Article 6(1)(f) GDPR: Legitimate interest of the Data Controller in the protection of the law (related to compliance with national or EU legislation on equal treatment, e.g. the Act on Equal Treatment and the Promotion of Equal Opportunities in Hungary).

You have the right to object to the processing of your personal data based on legitimate interests at any time.

### Categories of the data processed

The data collected and processed in connection with the application, such as

- Name
- E-mail address
- Telephone number
- Date of birth, place of birth
- Photo (if given)
- Resume
- References and other personal information you provide to us

### Retention time

3 years after the end of the selection process, taking into account the period of eligibility for labour law claims.

### Data processors

- Server provider
- HR service provider
- Headhunter

## 2.8. Data subjects' requests

### Purpose and legal basis for data processing

If you contact our company as a data subject regarding your personal data, we will process your data for the purposes of responding to your request and for legal remedies, as well as to comply with obligations under data protection rules and to ensure accountability. Legal basis for processing - Article 6(1)(c) GDPR is compliance with a legal obligation to which the Data Controller is subject.

### Categories of the data processed

- Name
- E-mail address
- Content of the request
- Data provided by the data subject in the exercise of his or her rights
- Other personal data obtained during the identification process, etc.

### Retention time

5 years from the date of receipt of the request.



## Data processors

- Server provider
- DPO/ Entity entrusted with data processing

## Recipients of data transfers

AutoWallis Nyrt.

## 2.9 Data processing in relation to cameras

### Purpose and legal basis for data processing

The Data Controller operates a camera surveillance system at its headquarters and premises for security and property protection.

The recording of images by means of the camera system involves the processing of the images of employees, customers and guests of the company as personal data.

Legal basis for processing - Article 6(1)(f) GDPR – is the legitimate interest of the Data Controller in the protection of his/her assets and quality assurance.

You have the right to object to the processing of your personal data based on legitimate interests at any time.

### Categories of the data processed

- Photo, video recording
- Place and time of recording
- All other personal data that can be deduced from the recordings.

### Retention time

Personal data is stored for different periods of time at each location. Please check the information posted on the site before entering the location.

Anyone who wishes to exercise their rights under the GDPR may notify the Data Controller in writing 48 hours before the end of the storage period.

### Data processors

The recordings may only be disclosed to the police or other authorities or courts and to persons providing data protection, legal and technical advice and services to the Data Controller.

## 3. Rights of data subjects

As a data subject, you have the right to request information about the processing of your personal data and access to such data. You also have the right to request the rectification, erasure or withdrawal of your personal data, except for mandatory processing. Furthermore, you may exercise your right to data portability by contacting us at the above contact details (1.1. and 1.2.). You may object to processing based on legitimate interest at any time.

Upon receipt of your request, we will provide you with the information you require without delay, but no later than one month after receipt of the request. This service is provided free of charge unless the request is deemed to be unfounded or excessive.

### Right to be informed

We provide information about the details of data processing in a concise, transparent, understandable and

easily accessible form, in clear and plain language. This document has been written for that purpose.

### The right of access

You have the right to receive feedback from us on whether your personal data is being processed. If you provide us with appropriate proof of your identity and we process your personal data, you have the right to be informed of the details of the processing and to receive a copy of your personal data.

### Right of rectification

Any data subject may request the rectification of personal data that we hold about him or her that is inaccurate for any reason, or the completion of incomplete data. We may ask for an additional information to ensure accuracy.

### Right to erasure (right to be forgotten)

You are entitled to request the erasure of your personal data if one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected;
- if you withdraw your consent and there is no other legal basis for the processing;
- if you object to the processing and there are no other legitimate grounds for the processing which override the objection;
- the unlawful processing of personal data has been established;
- we are under any other legal obligation to delete it.

### Right to restriction of processing

You can request the restriction of the processing of your personal data in the cases set out in the GDPR. For example, for the time it takes to verify the disputed accuracy of personal data or if you request the retention of data that would otherwise be deleted in order to pursue a legal claim.

If the processing is subject to restriction, the personal data will only be stored and processed beyond storage in exceptional cases. We will inform you in advance of the lifting of the restriction on processing.

### Right to portability

As a data subject, you have the right to receive your personal data from us in a structured, commonly used, machine-readable format and to transfer this data to another data controller. Such a request will typically be in MS Word or Excel format. You have the right to data portability if the processing is automated and the legal basis for the processing is your consent or the performance of a contract.

### Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on the legitimate interests of the Controller. As Data Controller, we may only continue to process your data where there are compelling legitimate grounds for doing so or where it is necessary to pursue legal claims.

### Right to withdraw consent

In cases where we process your data on the basis of your consent, you have the right to withdraw your consent at any time, in which case we will cease processing. Withdrawal of consent does not affect the lawfulness of the processing that took place before consent was withdrawn.

## 4. Procedural rules, legal remedies

If you exercise your right as a data subject under the previous chapter, we will inform you of the action we have taken or, if not taken, of the reasons for not taking action without undue delay and in any event within one month of receipt of the request. If necessary and taking into account the complexity of the request and the number of requests, this time limit may be extended by two months. We will inform you of the extension, stating the reasons for the delay, within one month of receipt of the request.

If you submit your request to us in any form, we will respond by e-mail unless you specifically request otherwise.

We will inform all recipients to whom or with whom we have disclosed your personal data of any rectification, erasure or restriction of processing we have carried out, unless this is impossible or involves a disproportionate effort. We will inform you of these recipients upon request.

As a data controller, we handle, record, process and transmit the personal data of Data Subjects in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation ("GDPR"), Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information, and other legal provisions and recommendations of public authorities on data protection.

If you believe that your right to information self-determination has been violated, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information at.

National Authority for Data Protection and Freedom of Information

Postal address: 1530 Budapest, PO Box 5; website: <http://naih.hu>

In addition, if you believe that we are processing your personal data in breach of the legal requirements for the processing of personal data, you may also bring a lawsuit before the competent court in your place of residence or domicile (<https://birosag.hu/ugyfeleknek/birosagok/torvenyszekek>).