SZ-15
POLICY FOR THE RULES OF PUBLICATION OF DATA OF PUBLIC INTEREST, AND THE FULFILMENT OF REQUESTS TO ACCESS SUCH DATA

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With the issue of this regulatory document, the previous version dated 08/09/2017 shall become void.

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Table of contents

Contents	Page
Cover	1
I. GENERAL PROVISIONS	**3**
1. PURPOSE OF THE POLICY	**3**
1.1. Inputs of the policy	3
1.2. Expected result of the application of the policy	3
1.3. Definition of necessary resources	3
2. SCOPE OF THE POLICY	**3**
3. DEFINITIONS	**4**
II. PUBLICATION OF DATA OF PUBLIC INTEREST	**4**
III. RULES ON THE FULFILMENT OF REQUESTS FOR DATA OF PUBLIC INTEREST	**4**
IV. DATA PROTECTION REQUIREMENTS	**5**
V. CLOSING PROVISIONS	**5**
VI. REFERENCES	**6**
VII. ANNEXES	**6**

I. GENERAL PROVISIONS

1. PURPOSE OF THE POLICY

The purpose of this Policy is to define in respect of KÉZMŰ Közhasznú Nonprofit Kft. (the "Company") the rules of publication of data of public interest, and the fulfilment of requests to access such data.

Where this Policy mentions data of public interest, this term shall also comprise data public on grounds of public interest.

1.1. Inputs of the policy

The effective design, regulation and operation of this policy requires knowledge of the relevant provisions of **Act CXII of 2011** on the Right of Informational Self-Determination and on Freedom of Information ("**Privacy Act**") and of **Act CXXII of 2009** on the More Economical Operation of Publicly-Owned Companies, as well as the efficient and lawful performance of tasks of the organisational units specified in the policy.

1.2. Expected result of the application of the policy

This policy is expected to be suitable to support the publication of data of public interest in accordance with the applicable laws, and in the case of requests for data of public interest the fulfilment of such requests in accordance with the laws and this policy.

1.3. Definition of necessary resources

The following resources shall be needed to introduce this Policy, then apply the same in practice, and review such implementation:

- The organisational units specified herein as per the Company's currently effective **Organisational Statutes**, as well as the personnel of such units, suitable to fulfil the tasks specified in this policy.
- The material and financial preconditions necessary for the implementation of the Policy and to review such implementation.

2. SCOPE OF THE POLICY

2.1. The personal scope of the Policy shall comprise the Company's employees—in particular those who participate in the performance of the tasks related to the publication of data of public interest and the fulfilment of requests to access such data—as well as any other natural and legal persons who submit requests for data of public interest to the Company.

2.2. The material scope of the Policy comprises the full range of data of public interest and data public on grounds of public interest.

3. DEFINITIONS

a) Data of public interest:

Information or data other than personal data, registered in any mode or form, controlled by the body or individual performing state or local government responsibilities, as well as other public tasks defined by legislation, concerning their activities or generated in the course of performing their public tasks, irrespective of the method or format in which it is recorded, its single or collective nature; in particular data concerning the scope of authority, competence, organisational structure, professional activities and the evaluation of such activities covering various aspects thereof, the type of data held and the regulations governing operations, as well as data concerning financial management and concluded contracts.

b) Data public on grounds of public interest:

Any data, other than public information, that are prescribed by law to be published, made available or otherwise disclosed for the benefit of the general public.

c) Publication:

Publication by electronic means as defined in the Act on the Right of Informational Self-Determination and on Freedom of Information.

II. PUBLICATION OF DATA OF PUBLIC INTEREST

The data of public interest defined in Annex 1 to the Privacy Act are directly available on the Company's website (www.kezmu.hu); published in accordance with Section 33 (1) and Section 35 (1) of the Privacy Act and Section 2 of Act CXXII of 2009 on the More Economical Operation of Publicly-Owned Companies.

The scope of the data and documents ordered to be published are included in the certificate **SZ-15-B-01 Scope of Data Public on Grounds of Public Interest**, which is kept by the Department of Corporate and Social Communication. In the event of any change in the content of data of public interest, the Department of Corporate and Social Communication shall be informed of the fact and the content of the change—by the Legal Department if the change originates in statutory changes, and by the organisational unit responsible for the updating and recording of data if the change has other reasons—within 3 business days of the change. In accordance with such notice, the Department of Corporate and Social Communication shall ensure that the changed data of public interest is published without delay on the Company's website.

The Department of Corporate and Social Communication shall ensure that data of public interest are kept up-to-date on the website, taking the deadlines specified in Annex 1 to the Privacy Act into consideration.

III. RULES ON THE FULFILMENT OF REQUESTS FOR DATA OF PUBLIC INTEREST

Requests to access data of public interest may be submitted verbally, in writing or electronically. Requests may be submitted verbally at the Company's head office (H-1147

Budapest, Csömöri út 50-60) during opening hours (Monday to Thursday between 10:00 and 11:00 a.m.), or in writing the request, using the form **SZ-15-B-02 Request to Access Data of Public Interest**, should be forwarded in the form of a mail addressed to the Company's registered office or submitted there in-person, or sent electronically to the Company's email address info@kezmu.hu, with the subject "request to access data of public interest".

The desired data of public interest should be identified clearly, in an accurately identifiable manner in the request.

The Company shall fulfil any request to access data of public interest within 15 days at the latest of the receipt of the request. If the data request concerns data of considerable size, or a large number of data, the 15-day timeframe may be extended once by an additional 15 days. In such cases, the Company shall inform the applicant of the extension of the deadline within 8 days of the receipt of the request (Section 29 of the Privacy Act).

The fulfilment of requests to access data of public interest submitted to the Company shall be the responsibility of Corporate Secretariat, with the involvement of the Legal Department if necessary.

In the event of any infringement connected to the exercise of rights related to access to data of public interest, the data applicant may turn to the Hungarian National Authority for Data Protection and Freedom of Information (H-1024 Budapest, Szilágyi Erzsébet fasor 22/C), or to the Budapest-Capital Regional Court (H-1363 Budapest, Pf. 16, or H-1055 Budapest, Markó u. 27), within 30 days of the communication of the rejection of performance, or in the absence of such communication, within 30 days of the lapse without performance of the 15-day deadline.

IV. DATA PROTECTION REQUIREMENTS

Access to published data may not be bound to the disclosure of identification data. In the case of access to electronically published data of public interest, personal data may be processed only in so far as this is absolutely technically necessary to provide access; subsequently the personal data must be erased without delay.

If data are disclosed on the basis of a request, the identification data of the data applicant may be processed only in so far this is absolutely necessary to fulfil the request, including the payment of costs, if any. After the fulfilment of the request, the payment of costs, and the lapse of the retention period of accounting documents the personal data of the applicant must be deleted without delay.

V. CLOSING PROVISIONS

This policy shall be published on the www.kezmu.hu website, where the form **SZ-15-B-02 Application Form for Access to Data of Public Interest** is also available for download.

This Policy shall enter into force on the date it is signed; however, its provisions shall be applied in ongoing cases as well.

With the issue of this regulation, the regulation dated 08/09/2017 shall become void.

VI. REFERENCES

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information ("Privacy Act")
- Act CXXII of 2009 on the More Economical Operation of Publicly-Owned Companies

VII. ANNEXES

Responsibility Matrix	SZ-15-M-01
Risk Analysis Sheet	SZ-15-M-02
Scope of Data Public on Grounds of Public Interest	SZ-15-B-01
Application Form for Access to Data of Public Interest	SZ-15-B-02

Budapest, 14 December 2020

Péter Csizi
Managing Director