

## **DATA PRIVACY POLICY**

### **on the data management related to the surveillance system (camera control) on the sightseeing buses operated by Program Centrum Kft.**

#### **1. Name and contact information of the data controller**

The camera system is operated by **Program Centrum Utazásszervező Kft.** as data manager.

Seat of the data controller: 1221 Budapest, Szabina utca 15/b.

Company registration number of the data controller and the name of the registering court:

01-09-688375 (Company Court of the Metropolitan Court)

Data controller's e-mail address: [programcentrum@discoverbudapest.hu](mailto:programcentrum@discoverbudapest.hu)

Phone number of data controller: +36 1 317-7767

The person who operates the system and has the right to access the data (qualifies as a data controller):

BAZARETKER Kft. (Béla Lázár personal and property security guard)

Seat: 1184 Budapest, Aranyeső u. 8.

Company registration number and name of the registering company court: Cg. 01-09-960575

(Company Court of the Metropolitan Court)

e-mail address: [bazaret@gmail.com](mailto:bazaret@gmail.com)

Phone number: +36 20 257-9222

#### **1. Monitoring of the passenger compartment on board**

##### **1.1 The scope of managed data**

Our company as a data controller operates an electronic surveillance system (hereinafter: cameras) which is adapted for monitoring the movement on the sightseeing buses though personal data is processed by data containing.

Processed personal data: live image

The placed cameras are not recording, they only transmit live images.

##### **1.2. The concerned persons**

All persons using the data controller's sightseeing buses (passengers, employees, third parties)

##### **1.3. The purpose of data management**

The purpose of monitoring is to protect the life, physical integrity and property of persons on the data controller's sightseeing buses.

The aim is to detect violations of law, to catch the perpetrator, to prevent illegal acts.

##### **1.4. Legal basis for data management**

The data manager performs the data management based on the express consent of the data subject and on the basis of a legitimate interest. The data controller performed the assessment of interests and established the following:

- the rights of the concerned persons: protection of personal rights (image)
- legal interest: personal and property protection detailed in the purpose of data management
- consideration of necessity and proportionality, purposefulness and data saving

The concerned persons are informed by placing the accessibility of the current regulation on the sightseeing buses and also by publishing this regulation in our customer service offices and on our website.

##### **1.5. The location of the cameras and their monitored areas**

Camera No.1

- location: on the windshield of the upper deck, facing the inside area of the bus
- monitored area: upper deck

##### **1.6. Place and duration of data management**

The data controller does not perform recorded monitoring. The live image can be monitored only by the staff on a monitor located in the bus driver's cab.

### **1.7. Data security measures**

The monitors for inspecting the images are placed such as unauthorized persons cannot see them.  
Recorded shots cannot be recorded with any other device.  
Data is not transferred to third countries or to international organizations.  
Data processing will not be used.  
The data controller does not perform automated data management, neither creates profiles.

## **2. Reverse camera**

### **2.1 The scope of managed data**

Our company as a data controller operates an electronic surveillance system (hereinafter: cameras) which is adapted for monitoring the movement on the sightseeing buses though personal data is processed by data containing.

Processed personal data: live image

The placed cameras do not record, they only transmit live images.

### **2.2. The concerned persons**

All persons participating in the traffic and passers-by.

### **2.3. The purpose of data management**

The purpose of monitoring is the safe transport of the data controller's sightseeing buses and to protect the life and physical integrity of the participants in the traffic and persons on the data controller's sightseeing buses, as well as protecting the integrity of the buses.

### **2.4. Legal basis for data management**

The data manager performs the data management on the basis of a legitimate interest. The data controller performed the assessment of interests and established the following:

- legal interest: personal and property protection detailed in the purpose of data management
- consideration of necessity and proportionality, purposefulness and data saving

The concerned persons are informed by placing the accessibility of the current regulation on the sightseeing buses and also by publishing this regulation in our customer service offices and on our website.

### **2.5. The location of the cameras and their monitored areas**

Camera No.2

- location: on the rear window of the bus, facing out of the bus (reverse camera)
- monitored area: the area behind the bus

### **2.6. Place and duration of data management**

The data controller does not perform recorded monitoring. The live image can be monitored only by the staff on a monitor located in the bus driver's cab.

### **2.7. Data security measures**

The monitors for inspecting the images are placed such as unauthorized entities cannot see them.  
Recorded shots cannot be recorded with any other device.  
Data is not transferred to third countries or to international organizations.  
Data processing will not be used.  
The data controller does not perform automated data management, neither creates profiles.

## **3. Monitoring the area in front of the bus**

### **3.1 The scope of managed data**

Our company as a data controller operates an electronic surveillance system (hereinafter: cameras) which is adapted for monitoring the movement on the sightseeing buses though personal data is processed by data containing.

Processed personal data: live and recorded image  
The placed cameras are do not record, they only transmit live images.

### **3.2. The concerned persons**

All persons using the data controller's sightseeing buses (passengers, employees, third parties)

### **3.3. The purpose of data management**

The purpose of monitoring and camera recording is to protect the life, physical integrity and property of persons on the data controller's sightseeing buses.

The aim is to detect violations of law, to catch the perpetrator, to prevent illegal acts and if necessary, to be used as evidence in legal or other official proceedings.

### **3.4. Legal basis for data management**

The data manager performs the data management on the basis of a legitimate interest. The data controller performed the assessment of interests and established the following:

- the rights of the concerned persons: protection of personal rights (image)
- legal interest: personal and property protection detailed in the purpose of data management
- consideration of necessity and proportionality, purposefulness and data saving

The concerned persons are informed by placing the accessibility of the current regulation on the sightseeing buses and also by publishing this regulation in our customer service offices and on our website.

### **3.5. The location of the cameras and their monitored areas**

Camera No.3

- location: located on the windshield of the lower deck of the bus, facing outwards from the bus
- monitored area: the area in front of the bus

### **3.6. Place and duration of data management**

The data controller performs a recorded monitoring. In absence of use of the recorded image, the shot must be cancelled or deleted no later than fifteen working days from the date of recording. Use is considered if the recorded shot and other personal data are used as evidence in legal or other public proceedings.

Within fifteen working days from recording the person whose right or legal interest is purposed by recording may request by proving his right or legal interest that the data should not be cancelled or deleted by the data controller.

The recorded shot and other personal data must be sent upon request of a legal or other public authority to the court or to the authority without any fail.

If the destroy of the record has been involved, the record cannot be deleted until the authorized writ or official request has not been received by the data controller, or it is necessary due to the reason indicated in the submitted request by the concerned person, but no later than six months from the received request. The duration of data management in the case of investigation is the time of the investigation, but no more than 60 days after the date of recording the shot, or the investigation and the measures taken as a result and in the case of legal or public authority's proceedings, 15 days after the decision closing the proceedings becomes final or comes into force.

### **3.7. Data security measures**

The monitors for inspecting and re-inspecting the records are placed such as unauthorized persons cannot see it's replay.

Recorded shots cannot be recorded with any other device except the central recording unit.

Access is possible to the stored records only in a secured way (with a password), so the person of data controller can be identified. The review and the saving of the stored records must be documented. The access to the stored records must be immediately terminated in case of the entitlement's reason ends.

Data is not transferred to third countries or to international organizations.

Data processing will not be used.

The data controller does not perform automated data management, neither creates profiles.

#### **4. Rights and redresses of the concerned persons**

The concerned persons have the following rights during the data privacy processing:

- they may require the restriction of one or more of their data
- they may require that an automatic decision's scope should not cover them
- they may require their data's transfer or transmission
- they may require information about the processed data, legal base, the purpose and duration of data processing
- they may require the modification of one or more of their data
- they may require access to their data
- they may protest against processing of one or more of their data
- they may require to delete one or more of their data

The Data Controller shall immediately inform the concerned person, at the latest within one month of receiving of its request, about the measures taken based on its request.

In case of violation of the concerned person's rights the data subject may appeal to the court. The concerned person – of its own choosing – may bring an action before the competent court of its place of residence, or habitation.

Data protection supervisory authority: National Data Protection and Freedom of Information Authority (hereinafter: NAIH, address: 1055 Budapest, Falk Miksa utca 9-11, e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)). The concerned person may submit a complaint to the NAIH in case of its point of view the processing of its personal data does not comply with the legal obligations. A judicial review can be initiated against the NAIH's decision.

Budapest, 6<sup>th</sup> November 2023.

Program Centrum Kft.