

**INFORMATION REGARDING THE OPERATION OF THE CAMERAS ON THE
PASSENGER BUSES OPERATED BY ARRIVABUS Kft.
Effective 5 November, 2025**

The purpose of this information sheet is to ensure that ArrivaBus Kft. (Registered office: 8000 Székesfehérvár, Berényi út 72-100., Company registration number: 07-09-006293, tax number: 11604213-2-07, hereinafter: **Company** or **Data Controller**) complies with applicable data protection rules, especially but not exclusively REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 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 (General Data Protection Regulation) (hereinafter: **GDPR**), and No 41. Act of 2016 on passenger transport services (hereinafter: **Passenger Transport Act**).

General information:

The basic purpose of this information sheet is to provide guidance to the traveling public on the data management activities of the Company in the course of its video and audio recording activities with the cameras on the buses it operates.

Based on the authorization provided by GDPR and the Passenger Transport Act, by evaluating the circumstances in a privacy impact assessment, the Company has the right to installing cameras capable of recording image and sound recordings on vehicles used for the carriage of passengers.

The Company publish special notices for the data subjects concerning the use of cameras, and also publish the present short information sheet re data processing.

In all cases, the cameras are installed, and their viewing angle is set to record as little other information as possible to achieve the purpose of data processing. The 0-24 hours surveillance of the camera system is performed by the external security service provider (as a data processor). The order of internal access to the recordings is laid down in separate internal policy. Data processing is essential to achieving data management purposes and cannot be implemented effectively in any other way. Data processing is proportionate to the purposes pursued, restricts the rights and interests of data subjects only to a small extent, and the processing of personal data does not involve harassment of data subjects, the performance of irregular additional acts or unreasonable interference with their privacy. Data processing related to the use of cameras is necessary for the performance of a task carried out in the public interest and in accordance with section 8 and 8/A of the Passenger Transport Act. it is considered *mandatory data processing*.

In addition to the mandatory data processing, the Data Controller performs additional data processing during the related internal investigations, in particular by recording protocols, which, on the basis of a balancing test, are concluded based on the *legitimate interest* in achieving the data management objectives.

Data Controller and its representative:

ArrivaBus Kft.
seat: 8000 Székesfehérvár, Berényi út 72-100.
tax number: 11604213-2-07
company registration number: 07-09-006293

telephone: +36 22 330 575
e-mail: adatvedelem@arrivabus.hu

Data processor providing the camera management services:

J&J (PSV) Magyarország Kereskedelmi és Szolgáltató Kft.
seat: 2143 Kistarcsa, Rozmaring utca 9.

tax number: 14378892-2-13

company registration number: 13-09-121272

contact data: telephone: +36 1 8983905 e-mail: info@jandjpsv.eu

For convenience the particulars of the data processing are recorded below in chart format:

Camera surveillance on operated buses

In connection with its passenger transport service activities, the Company may operate camera surveillance system on the vehicles used by the Company and its subcontractors for passenger transport.

The Company will automatically delete the video and audio records (hereinafter together: records) on the 16th day after the recording.

Any person whose right or legitimate interest is affected by the records may, within 15 days of the recording, by proving his/her right or legitimate interest, and those who are included in the records without proving their right or legitimate interest, may request the Data Controller (on the above contact) not to delete the records.

At the request of a court or authority, the records shall be sent to the court or authority or, if the court / authority so orders, to the requesting person without delay, in such a case, the Company will delete the records 90 days after it is sent to the court or authority. If a request has been made for the Company not to delete the records on the 16th day, the records may not be deleted until the court / authority request is received by the Data Controller or otherwise the records are necessary for the reason indicated in the request of the data subject, but not more than for 6 months from the date of receipt of the request. This period may be extended by additional 6-month periods upon request of the data subject, if necessary. Meaning, that if the Company does not receive an official or court request within this period, and the data subject does not submit a request as reply to the Company's notice, the records will be deleted by the end of the 6 months term.

The Company may use the records to investigate the circumstances of events, accidents, and damages concerning the persons using the transport services, the users of the equipment in its operation, the employees and agents of the Company and the persons in the areas under its management, as well as their luggage, vehicles, equipment tools, and other property, and services ordered by the Company based on legal authorization, and also to investigate the complaints filed with the Company. For the duration of such investigation, the Company shall be released from the obligation to deletion, provided that the event has been reported to it within the specified time limit or has otherwise become known to it, in such case the records shall be deleted on the 15th day after the completion of the investigation. If, as a result of the investigation, a court or official proceeding is initiated, the Company shall delete the records on the 16th day following receipt of the court or official notification that the decision concluding the court or official proceeding has become final or has become legally binding.

In the event of passenger complaints, passenger accidents, damage / theft on buses, or other events other than in the ordinary course of business - if no request or other application is received within the legal opening period - the Company will draw minutes/notes on what can be seen and heard on the camera records, and, if necessary, saves relevant pictures of the records, which shall be attached to the minutes on the actual incident and will be saved until of elapse of statutory timeframe for possible claims.

Furthermore, taking into account that the Company provides passenger transport services in Budapest public transport based on the order of BKK (Budapesti Közlekedési Központ), and according to the provisions of the Passenger Transport Act, BKK is also entitled to use the records made by the Company for the purposes of investigate the circumstances of events, accidents, and damages in its own competence, concerning the persons using its services, the users of the equipment it operates, BKK employees, agents and persons staying in the areas it manages, as well as their luggage, vehicles, equipment, tools and other property, and concerning the service ordered by BKK based on the statutory authorization, as well as for the investigation of complaints filed with BKK, thus, upon such a request

from BKK – submitted in accordance with the statutory provisions – the Company is obliged to forward the records to BKK.

The recordings are recorded by an external service provider as a data processor, the records are downloaded by the external service provider operating the camera system in case of a separate request from the Company. The transfer of the records to the Company is always confirmed in minutes.

Description of data processing	Type of data processed	Purpose of data processing	Legal basis of data processing	Source of data	Addressees
Management of video and audio records of camera surveillance on passenger buses	- Portraits, voice and behavior of persons in the passenger area of buses and, in some cases, partially visible in external locations around the buses and in traffic, and time and GPS data adapted to the movement of the buses - Contents of the application form for downloading data	the protection of the life, person, bodily integrity and property of passengers and of the service provider's employees and agents; detection and proving of facts in case of illegal acts and offences against them; demonstration of offenses against them; investigation of accidents and complaints and events out of the ordinary course of business	Mandatory data processing (GDPR Article 6 (1) point e) based on section 8 and 8/A. of the Passenger Transport Act)	Data subjects	Data processor providing the camera surveillance services Police/courts, other authorities, should the need arise
Minutes on the content of video and audio records	description concerning persons and their movements in the passenger area of buses and, in some cases, partially visible in external locations around the buses and in traffic, and GPS data adapted to the movement of the buses	the protection of the life, person, bodily integrity and property of passengers and of the service provider's employees and agents; detection and proving of facts in case of illegal acts and offences against them; demonstration of offenses against them; investigation of accidents and complaints and events out of the ordinary course of business	Legitimate interest: Protection of persons and property and the facilitation of the investigation and proving of facts in case of accidents and complaints and events out of the ordinary course of business	Data subjects	Data processor providing the camera surveillance services Police/courts, other authorities, should the need arise

Forward of video and audio records to BKK	- Portraits, voice and behavior of persons in the passenger area of buses and, in some cases, partially visible in external locations around the buses and in traffic, and time and GPS data adapted to the movement of the buses - Contents of the application form for downloading data	the protection of the life, person, bodily integrity and property of passengers and of the service provider's employees and agents; detection and proving of facts in case of illegal acts and offences against them; demonstration of offenses against them; investigation of accidents and complaints and events out of the ordinary course of business	Mandatory data processing (GDPR Article 6 (1) point e) based on section 8 (13a) of the Passenger Transport Act)	Data subjects	Data processor providing the camera surveillance services BKK as sole data controller
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Data processing in connection with the exercising of data subject rights re camera records

Data subjects may, within the retention period, exercise their rights in connection with data processing, be informed about the processing of their data, and have the opportunity view the records and request a copy of the camera records.

Data subject may request a view / copy of the records as follows:

Data Subject may submit his/her request in person, in writing or by e-mail. When submitting the request, the Data Subject must specify exactly to which records the Data Subject intends to submit the request (when, where in which bus was the records made). Data subject must specify exactly on which bus, in which part of the vehicle he/she traveled and what color and type of clothing he/she wore, and must prove identity by sending a copy of any photo ID in order for (i) the Data Controller to verify that the request was indeed received from the Data Subject and (ii) the Data Subject can be identified on the basis of his or her portrait (the other actors must be masked in the records). A copy of the ID card will be kept until the retention period of the camera records (if applicable, until the relevant police or other procedure is completed + 15 days).

The Data Subject may request a copy of the records by personal receipt, by post or by electronic means, in the request Data Subject must specify its choice, and accordingly must provide the necessary data (postal address, e-mail address). If the Data Subject does not provide the data carrier necessary for saving the records in the request, he/she shall reimburse the Data Controller for the fee. In the case of delivery by post, the postage fee shall also be borne by the person Data Subject.

- a) If the Data Subject receives the records in person or request only the viewing of the records, the reception/viewing may take place at the premises of the Company (1119 Budapest, Andor u. 27-31, entrance from Thán Károly u.) on Wednesdays between 10 am and 2 pm. Should you have such request, please send it to kamerafelvetel@arrivabus.hu e-mail address .Upon receipt/viewing, the Data Subject must identify himself/herself by presenting his/her identity card or other photo ID and the fact if receipt will be recorded in minutes, a copy of which will

be handed over to the Data Subject.

- b) In case of postal delivery, the Data Controller shall send the records to the postal address named by the Data Subject, and the delivery shall be governed by the business rules of Magyar Posta (please note that according to the postal rules, delivery may also take place to a deputy (e.g. cohabiting family member) over which the Data Controller has no influence).
- c) If Data Subject request the records by e-mail, then please send such request sent to kamerafelvetel@arrivabus.hu, and in such case the Data Controller will send the records in encrypted form to the e-mail address provided. The password required to decrypt is sent on a separate channel.

Any person whose right or legitimate interest is affected by the records may, within 15 days of the recording, by proving his/her right or legitimate interest, and those who are included in the records without proving their right or legitimate interest, may request the Data Controller (on the above contact) not to delete the records. In such case the records are saved and at the request of a court or authority, the records shall be sent to the court or authority or, if the court / authority so orders, to the requesting person without delay. In such case If the records may not be deleted until the court / authority request is received by the Data Controller or otherwise the records are necessary for the reason indicated in the request of the data subject, but not more than for 6 months from the date of receipt of the request. This period may be extended by additional 6-month periods upon request of the data subject, if necessary. Meaning, that if the Company does not receive an official or court request within this period, and the data subject does not submit a request as reply to the Company's notice, the records will be deleted by the end of the 6 months term.

A request for non-deletion may be made as follows:

- a) a) If the applicant is included in the records himself/herself, he/she is not obliged to substantiate his/her request, however, when submitting the request, he/she must specify exactly to which records he/she intends to submit the request (when, where in which bus was the records made). Must specify exactly on which bus, in which part of the vehicle he/she traveled and what color and type of clothing he/she wore and must prove identity by sending a copy of any photo ID in order for (i) the Data Controller to verify that the request was indeed received from a Data Subject and (ii) the Data Subject can be identified on the basis of his or her portrait. A copy of the ID card will be kept until the retention period of the camera records (if applicable, until the relevant police or other procedure is completed + 15 days).
- b) d) If the applicant is not included in the records himself/herself, he/she must substantiate the submission of his/her claim and prove his/her right or legitimate interest. The applicant needs to specify to which records he/she intends to submit the request (when, where in which bus was the records made), and before which authority and for what purpose he/she intend to use the records. Must specify exactly on which bus, in which part of the vehicle where the given incident re which he/she intends to use the records, and if possible, needs to describe the relevant circumstances which may allow the Data Controller to identify the recordings.

Recordings stored on the basis of a request for non-deletion shall be handed over to the authority/court upon request of an authority/court or, in the event of such order of the court/authority, to the requesting person.

Description of data processing	Type of data processed	Purpose of data processing	Legal basis of data processing	Source of data	Addressees
Data processing in connection with the exercising of data subject rights re camera records	- Name of applicant - In case the applicant is the Data Subject his/her portrait, voice, movement, time and GPS data, and content	Answering Data Subject requests re camera records	Statutory obligation: Article 12 of GDPR	Data Subject	

	of ID documentation • Depending on the method of receiving the copies postal address or e-mail address • All additional data that is necessary for the identification of the records, as provided by the applicant				
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Rights of Data Subjects: In relation to the present data processing, Data Subjects have the following rights:

- **Right of access to your personal data:** You have the right to receive feedback from the Data Controller about whether your personal data is being processed and, if such data is being processed, you are entitled to have access to your personal data and all the relevant statutory information. Therefore, you have the right to contact the Data Controller and request information about your data being processed and request access to your data.

- **Right to the erasure of data:** You are entitled to request the Data Controller to delete your data if the data processing is no longer necessary for the purpose for which the data were recorded, if the processing is unlawful or if the deletion is required by law.

- **Right to restrict data processing:** You may request a restriction of data processing if the data processing is unlawful or if the Data Controller no longer needs the data for the purpose of data management, but you wish to use it for the submission of a legal claim. Restricting data processing means that the data can only be stored until the restriction is released or until the transfer of the data to the court/authority concern.

- **Right to object to processing of personal data:** You are entitled to object to the processing of your personal data at any time for reasons related to your own situation. In such a case, the Data Controller will individually examine whether there is a legitimate reason justifying the need for data processing.

- **Right to file a complaint to the Supervisory Authority:** You are entitled to file a complaint with the National Authority for Data Protection and Freedom of Information. (Contact: 1055 Budapest, Falk Miksa utca 9-11., 1363 Budapest, Pf. 9.; phone: +36 1 391-1400; telefax: +36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu)

- **Judicial Enforcement:** You have the right to apply to the court if you consider that the Data Controller or the Data Processor acting on its behalf or acting on its instructions processes your personal data in violation of the requirements for the processing of personal data.

If you have any questions regarding the processing of your personal data, please write to our adatvedelem@arrivabus.hu e-mail, or 8050 Székesfehérvár, Pf. 1050 postal address or you can contact us at +36/22-330-575 by phone. In case you request copy or viewing of camera records, then please send your request to the kamerafelvetel@arrivabus.hu e-mail address. Our Data Privacy Policy is available at the registered office of the Company and is available on the <https://www.arrivabus.hu/kozerdeku-adatok> Company website.