

DATA PROTECTION NOTICE

Greenergy Market Korlátolt Felelősségű Társaság

Energy procurement consultancy · Energy trading · PPA · Energy audit and other services

Effective from: 23 June 2026 | Version: 2.1

1. DETAILS OF THE DATA CONTROLLER

Full name	Greenergy Market Korlátolt Felelősségű Társaság
Short name	Greenergy Market Kft.
Registered seat	1138 Budapest, Tomori utca 34., Hungary
Tax number	29027884-4-41
Main activity	7020 – Business and other management consultancy
Website	https://greenergymarket.hu/
Data protection contact	László Harasztovich (Managing Director)
E-mail	harasztovich.laszlo@greenergymarket.hu
Phone	+36 70 376 4815

2. GENERAL INFORMATION

Greenergy Market Kft. (hereinafter: the “Controller”) informs data subjects, by means of this notice, about the principles, purposes, legal basis and duration of the processing of personal data, the rights of data subjects and the available remedies, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), Act CXII of 2011 (the Info Act), and the applicable Hungarian legislation.

The Controller's scope of activity covers, in particular, the following:

- energy procurement consultancy (individual and group electricity and natural gas procurement, tender management)
- energy trading (sale and intermediation of electricity and natural gas under a trading licence)
- organisation and execution of PPA transactions (Offsite and Onsite Power Purchase Agreement)
- EnergySafe and Fixing Advisory (hedging strategy, market monitoring, PriceStream)
- aggregator service (aFRR balancing reserve, MAVIR accreditation)
- network usage fee (RHD) optimisation
- energy, EKR and corporate tax (TAO) audits and mandatory energy auditing
- energy training and energy officer ("szakreferens") services
- public procurement consultancy

3. APPLICABLE LEGISLATION

- Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR)
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Info Act)
- Act V of 2013 on the Civil Code (Civil Code)
- Act C of 2000 on Accounting (Accounting Act)
- Act LXXXVI of 2007 on Electricity (Electricity Act)
- Act XL of 2008 on Natural Gas Supply (Gas Act)
- Act LVII of 2015 on Energy Efficiency
- Act CXLI of 2015 on Public Procurement (Public Procurement Act)
- Act CLV of 1997 on Consumer Protection (Consumer Protection Act)
- Act CVIII of 2001 on Electronic Commerce (E-Commerce Act)

4. PURPOSE OF THE PROCESSING, CATEGORIES OF DATA PROCESSED, LEGAL BASIS AND RETENTION PERIOD

The table below summarises all data processing activities related to the Controller's scope of business:

Purpose and scope of the data processing activity	Personal data processed	Legal basis (GDPR Art. 6)	Retention period
Energy procurement consultancy (individual and group electricity and natural gas procurement): request for offers, preparation, organisation and execution of tenders, contact management, review of existing contractual terms	Company name, registered seat, tax number; contact person's name, position, e-mail address, phone number; data of the site(s) of use; annual energy consumption (kWh, m ³); expiry date of the existing contract; last-call option; current energy price (optional)	GDPR Art. 6(1)(b) – preparation and performance of a contract; GDPR Art. 6(1)(a) – consent (for data provided on an optional basis)	In case of a contractual relationship: 5 years from termination of the contract (Civil Code) + accounting records for 8 years. If no contract is concluded: 1 year, or until withdrawal of consent.
PPA transactions (Offsite and Onsite Power Purchase Agreement): project development, offer, contract conclusion, contact management and settlement during the term of the PPA	Company name, registered seat, tax number; contact person's name, position, e-mail address, phone number; data of the site of use and production site; consumption and production profile; existing grid connection data	GDPR Art. 6(1)(b) – performance of a contractual obligation; GDPR Art. 6(1)(c) – legal obligation (Electricity Act, MEKH requirements)	5 years from termination of the PPA contract (Civil Code). Accounting records: 8 years. In case of a statutory reporting obligation, in accordance with the applicable legislation.
Energy trading (sale and intermediation of electricity and natural gas, trading activity carried out under a trading licence): request for offers, price agreement, contract conclusion, settlement	Company name, registered seat, tax number, bank account number; contact person's name, position, e-mail address, phone number; consumption/production data; metering data; billing data	GDPR Art. 6(1)(b) – performance of a contractual obligation; GDPR Art. 6(1)(c) – legal obligation (Gas Act, Electricity Act, MEKH)	5 years from termination of the contract (Civil Code). Accounting records: 8 years. Metering and settlement data: pursuant to the relevant sectoral legislation (typically 5–8 years).
EnergySafe and Fixing Advisory: development of hedging strategy, market monitoring, fixing recommendations, portfolio tracking (PriceStream)	Company name; contact person's name, e-mail address, phone number; energy portfolio data (contract prices, volumes, expiry dates)	GDPR Art. 6(1)(b) – performance of the advisory service agreement	5 years from termination of the engagement.
Aggregator service (aFRR balancing reserve, MAVIR accreditation): review of participation conditions, accreditation procedure, management of metering data, financial settlement	Company name, registered seat, tax number; contact person's name, e-mail address, phone number; metering point identifiers; capacity and energy data; bank account number	GDPR Art. 6(1)(b) – performance of a contractual obligation; GDPR Art. 6(1)(c) – legal obligation (MAVIR regulations)	5 years from termination of the service agreement; for metering data, pursuant to the relevant grid code.
Network usage fee (RHD) optimisation: analysis of metering data, optimisation of network tariffs, proposals for contract amendments	Company name; contact person's name, e-mail address, phone number; metering point identifiers; consumption profile; network contract data	GDPR Art. 6(1)(b) – performance of the advisory engagement	5 years from termination of the engagement.
Energy audit, EKR audit, corporate tax (TAO) audit, mandatory energy audit, review of comfort equipment: on-site survey, data collection, preparation of the audit report, reporting to the authority	Company name, registered seat, tax number; contact person's name, e-mail address, phone number; building and equipment data; consumption data; measurement results	GDPR Art. 6(1)(b) – performance of a contractual obligation; GDPR Art. 6(1)(c) – legal obligation (Act LVII of 2015)	5 years from closure of the audit report; in case of statutory reporting, for the period prescribed by law (typically 5–8 years).
Energy training and energy officer ("szakreferens") service: sending training materials, organising training sessions, performing the energy officer engagement	Name, position, e-mail address, phone number of the participant/principal; company name; billing data	GDPR Art. 6(1)(b) – performance of a contractual obligation	5 years from closure of the training/engagement; accounting records for 8 years.
Public procurement consultancy: documentation of the public procurement procedure, evaluation of tenders, reporting to the authority	Name, position, e-mail address and phone number of the contact persons of tenderers and contracting authorities; company data	GDPR Art. 6(1)(b) and (c) – performance of a contractual obligation and legal obligation (Public Procurement Act)	5 years from closure of the public procurement procedure (Section 46(2) of the Public Procurement Act); in case of a legal remedy procedure, until the deadline for challenging the decision of the Public Procurement Arbitration Board has expired, or in case of an administrative lawsuit, until its final and binding conclusion, but for no longer than five years.

Purpose and scope of the data processing activity	Personal data processed	Legal basis (GDPR Art. 6)	Retention period
Future contact: information on new energy procurement opportunities, market offers and the Controller's services, and business contact (marketing)	Contact person's name, position, e-mail address, phone number; company name	GDPR Art. 6(1)(a) – the data subject's explicit consent	Until withdrawal of consent, but for no longer than 10 years from the collection of the data.*
Newsletter (market analyses, #PowerFulFriday, #TTFTuesday and other edited content)	Subscriber's name, e-mail address	GDPR Art. 6(1)(a) – consent	Until unsubscription (withdrawal of consent).
Website visits and cookies (greenergymarket.hu): session management, statistics, analytics	IP address (anonymised), browser type, visit data, session identifiers	GDPR Art. 6(1)(a) – consent (cookie banner); for necessary cookies, legitimate interest	Session cookies: until the browser is closed. Analytics cookies: max. 13 months.
Complaint handling, legal disputes, enforcement of claims	Data relating to the data subject that are necessary in connection with the complaint or dispute	GDPR Art. 6(1)(c) and (f) – legal obligation, legitimate interest	Complaint records: 5 years (Section 17/A(7) of the Consumer Protection Act). Legal disputes: 5 years from the final conclusion of the proceedings.

* The 10-year retention period (in the row concerning future contact) applies exclusively where the data subject has given explicit, voluntary consent, which may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

5. DATA PROCESSORS

The Controller engages the following data processors (this notice will be updated in the event of any change in the identity of the data processors):

Name of the data processor	Purpose / activity of the processing	Contact / registered seat
Greenergy-Service Karbantartó Kft.	Management of partner data / database, bookkeeping	1138 Budapest, Tomori utca 34., Hungary; company registration no. Cg. 01-09-947750
Sybell Informatika Kft.	Website hosting, IT infrastructure	sybell.hu

6. TRANSFER OF DATA TO THIRD PARTIES

The Controller transfers personal data to third parties only on the basis of the data subject's prior written consent, or where required to comply with a statutory obligation (e.g. a request from an authority, reporting to MAVIR, or to the Hungarian tax authority (NAV)). The Controller does not transfer personal data outside the European Economic Area (EEA).

7. RIGHTS OF THE DATA SUBJECT

7.1 Right of access (GDPR Art. 15)

The data subject may request confirmation as to whether or not their personal data are being processed, and, where that is the case, may obtain access to the data processed.

7.2 Right to rectification (GDPR Art. 16)

The data subject may request the rectification of inaccurate data and the completion of incomplete data.

7.3 Right to erasure – “right to be forgotten” (GDPR Art. 17)

The data subject may request the erasure of their data where the purpose of the processing has ceased, where consent has been withdrawn, or where the processing is unlawful. Erasure is not possible where the data are necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.

7.4 Right to restriction of processing (GDPR Art. 18)

The data subject may request the restriction of processing in specific cases (e.g. where the accuracy of the data is contested, or where the processing is unlawful but the data subject does not request erasure).

7.5 Right to data portability (GDPR Art. 20)

In respect of data processed by automated means on the basis of consent or a contract, the data subject may request that the data be provided in a structured, machine-readable format.

7.6 Right to object (GDPR Art. 21)

The data subject may object to the processing of their data carried out on the basis of legitimate interest. In the case of processing for direct marketing purposes, the right to object is absolute.

7.7 Withdrawal of consent

Where processing is based on consent, the data subject may withdraw their consent at any time; this does not affect the lawfulness of the processing carried out before the withdrawal.

To exercise these rights, the data subject may contact the Controller using the following details:

- E-mail: info@greenergymarket.hu
- Phone: +36 70 376 4815
- Postal address: 1138 Budapest, Tomori utca 34., Hungary

The Controller shall examine and respond to the request within 30 days; this period may, where justified, be extended once by up to a further 60 days.

8. COMPLAINTS AND LEGAL REMEDIES

The data subject may lodge a complaint with the supervisory authority or seek judicial remedy:

Authority	National Authority for Data Protection and Freedom of Information (NAIH)
Address	1055 Budapest, Falk Miksa utca 9–11., Hungary
E-mail	ugyfelszolgalat@naih.hu
Website	https://www.naih.hu/
Phone	+36 1 391 1400

For judicial remedy, the court having jurisdiction is the Budapest-Capital Regional Court (the court with jurisdiction over the Controller's registered seat); however, the data subject may instead choose the regional court having jurisdiction over their place of residence.

Data subjects are requested, in the interest of consultation and a prompt resolution, to first contact our Company in the event of a complaint.

9. DATA SECURITY MEASURES

Pursuant to Article 32 of the GDPR, the Controller applies appropriate technical and organisational measures, in particular:

- preventing unauthorised access (password protection, access levels)
- preserving the integrity and confidentiality of the data (encryption, regular back-ups)
- minimising the risk of data loss and data breaches

The Controller processes the data on hosting operated by Sybell.hu and in its own CRM system.

Should a personal data breach (e.g. unauthorised access, data loss or data leakage) occur despite the above measures, the Controller shall, pursuant to Article 33 of the GDPR, notify the National Authority for Data Protection and Freedom of Information without undue delay and, where feasible, within 72 hours of becoming aware of the breach, unless the breach is unlikely to result in a risk to the rights and freedoms of data subjects. Where the breach is likely to result in a high risk to the rights and freedoms of data subjects, the Controller shall, pursuant to Article 34 of the GDPR, communicate the breach to the data subject(s) directly and without undue delay, together with its possible consequences and the measures taken or planned.

10. USE OF COOKIES

The greenergymarket.hu website uses cookies to improve the user experience and to analyse visit statistics. The data subject may grant or withdraw consent to non-essential cookies via the cookie banner. Necessary (functional) cookies are applied regardless of consent.

11. AMENDMENT OF THIS NOTICE

The Controller reserves the right to amend this notice. Amendments take effect upon publication on the website. In the event of a material change, the Controller shall also notify data subjects by e-mail.

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12. APPROVAL

Executed in Budapest, 12 August 2026.

Greenergy Market Kft.

László Harasztovich – Managing Director