

## Privacy notice

Dear Employee!

The purpose of this notice is to inform employees who are employed by us for the purpose of temporary employment about the processing of their personal data in the context of their employment relationship.

### 1. Identity of the controller

*On behalf of Pannon-Work as the lender*

The data controller of the personal data of our temporary agency workers is primarily the member of the Pannon-Work group of companies with whom the temporary agency worker has entered into an employment relationship. This may be Pannon-Work Zrt. (1114 Budapest, Bartók Béla út 15/D. II/18.), Gamax Kft. (head office: 1114 Budapest, Bartók Béla út 15/d. II/18.), HUNAM Personnel Solutions Kft. (1114 Budapest, Bartók Béla út 15.), Telekontakt Marketing Kft. (9165 Cakóháza Fő u. 41.), Arrabona-Work Kft. (9165 Cakóháza Fő u. 41.), Gamaxmédia Kft. (9165 Fő u. 41.), Parisatis Magyarország Kft. (2161 Csömör, Akácos utca 15.) Segéd-Erő Social Cooperative (9165 Cakóháza Fő u. 41.) Humán Labor Quality Kft. (9165 Cakóháza Fő u. 41.)

However, since the respective members of the Pannon-Work group of companies jointly maintain a website, customer service offices, partly use a common infrastructure, and the members of the Pannon-Work group of companies perform their activities in a complementary manner, the respective members of the Pannon-Work group of companies are also liable as data controllers together with the lending employer, as joint data controllers.

The current members of the Pannon-Work group of companies (hereinafter referred to as Pannon-Work):

Pannon-Work Zrt., HUNAM Personnel Solutions Ltd., Pannon-Work School Cooperative, Pannon Student School Cooperative, Work For All Social Cooperative, MELÓ-CLUB Work Organizing Social Cooperative, Pannon-Work Silver Public Interest Retired Cooperative, Gamax Ltd, Pannon-Work Student Work Organisation Ltd., Telekontakt Marketing Ltd., Arrabona-Work Ltd., Gamaxmédia Ltd., Parisatis Hungary Ltd., Segéd-Erő Social Cooperative, Human Lab Ltd., Pannon-Work Future Co-operative for People with Young Children at Home,

Data Protection Officer: Beáta Torma  
postal address: 9027 Győr Győri u. 5/a.  
e-mail account: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36 96 508 000

*Concerning borrowing*

When our temporary agency workers are employed by our partners (lesers), the leaser will also be a joint controller with us in the processing of their personal data relating to their employment, as the employer's tasks necessary for employment are shared between the member of Pannon-Work acting as a temporary employment agency and the leaser.

The establishment, termination and payment of wages are the responsibility of the lender, while the giving of instructions, the scheduling of working hours, and the performance of duties related to occupational safety and accidents are the responsibility of the leaser.

We will inform you of the identity of the leaser prior to the first lending or the first transfer of personal data (whichever is earlier).

*Contact details of the controller*

Based on agreements between members of the Pannon-Work group of companies and with our borrowing partners, the member of Pannon-Work acting as the lender will ensure that employees are informed and that the rights set out in Chapter VI of this information are exercised and that enquiries are answered.

How to contact us for questions about data management:

Pannon-Work Zrt.

postal mailing address: 1114 Budapest, Bartók Béla út 15/D II/18.  
e-mail box: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

Gamax Ltd.

postal address: 1114 Budapest, Bartók Béla út 15/d. II/18  
e-mail address: [adatvedelem@gamax.hu](mailto:adatvedelem@gamax.hu)  
phone: +36-1-372-0692  
website: [www.gamax.hu](http://www.gamax.hu)

HUNAM Personnel Solutions Ltd.

postal address: 1114 Budapest, Bartók Béla út 15. building D. II/18.  
e-mail address: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
telephone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

Work for All Social Cooperative

postal mailing address: 9165 Cakóháza Fő u. 41.  
e-mail box: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

MELÓ-CLUB Social Cooperative for Work Organisation

postal address: 2161 Csomád, Akácos utca 15.  
e-mail: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

Telekontakt Marketing Ltd.

postal mailing address: 9165 Cakóháza Fő u. 41.  
e-mail box: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-96-508-000  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

Arrabona-Work Ltd.

postal mailing address: 9165 Cakóháza Fő u. 41.  
e-mail box: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

GamaxMédia Ltd.

postal address: 9165 Cakóháza Fő u. 41.  
e-mail: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

Parisatis Hungary Ltd.

postal address: 2161 Csomád, Akácos utca 15.  
e-mail: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

Helping-Heart Social Cooperative

postal mailing address: 9165 Cakóháza Fő u. 41.  
e-mail box: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

Human Laboratory Ltd.

postal mailing address: 9165 Cakóháza Fő u. 41.  
e-mail box: [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)  
phone: +36-1-269-3631  
website: [www.pannonwork.hu](http://www.pannonwork.hu)

## 2. Employment-related data processing

2/A Pre-screening prior to rental

Purpose of data processing

Some of our lending partners require that they screen candidates who have previously been employed by them or a member of their group of companies before they are hired out, in order to decide whether they wish to work with you again in the future.

### The data processed

For the purposes of this clause, the surname, first name, origin, county of residence and, if known to us, whether the employee has previously worked for the leaser or a company in its group, and the employee's CV will be forwarded to our lending partner. For certain partners, the tax identification number of the person concerned may also be transmitted for identification purposes.

### Legal basis for processing

The legal basis for the processing is the prior, informed and voluntary consent of the data subject (Article 6(1)(a) GDPR). In the absence of consent, there is a possibility that the data subject will not be lent to the lending partner.

### Duration of processing

For the above purpose, the processing of the personal data of the data subject will be carried out until the feedback from our lending partner. In case of withdrawal of consent, the processing of the personal data concerned for this purpose will also be terminated.

## 2/B Establishment, performance and termination of employment

### Purpose of data processing

The purpose of data processing in the context of an employment relationship is the establishment, performance and termination of the employment relationship.

For example, we cannot conclude an employment contract if we cannot establish your identity or if you do not provide us with your tax identification number and social security number, which are essential for fulfilling tax and social security obligations relating to your employment (e.g. notification to the tax authorities of the establishment and termination of employment, tax and social security returns and payments).

Another aim of the employment relationship is to fulfil the rights and obligations provided for in the Labour Code. For example, the leaser is obliged to keep records of your working time, while we, as the lender, are obliged to keep records of the wages paid and the amount and the right to deduct from them. We also need your bank account number to pay your wages. In order to be able to pay you the additional leave provided for in the Labour Code, we need to know, among other things, whether you have children and how old they are.

In order to check the maximum loan period of 5 years, we need to know whether you have worked for a loan company in the previous 6 months and, if so, for which loan company and for how long.

### The data processed and their source

Some of your personal data that we process is provided directly by you to us for the purposes of entering into a contract through the personal data sheet, the employment contract, the personal data sheet completed at the time of entering into the employment contract and other forms and declarations (e.g. to claim additional leave), and forms completed and submitted to us in order to claim tax benefits and social security benefits.

In addition, you may also contact us by having your personal data necessary to establish an employment relationship sent to us by our partner who wishes to employ you as a leaser, with your prior consent.

Personal data also includes data relating to you that is generated in the course of the employment relationship, such as time records, wages paid, deductions from wages.

In the context of the above, you may provide personal data not only about yourself, but also about your dependants (spouse, child) (e.g. in connection with extra leave, family tax allowance). The provision of dependants' data is required by the applicable legislation.

A detailed list of the personal data processed on the basis of the employment relationship (including the data of family members) is set out in Annex 1 to this notice.

#### Legal basis for processing

If your personal data is transferred to us by our prospective lending partner for the purpose of the employment relationship, the legal basis for the transfer of data by our partner is your consent (Article 6(1)(a) GDPR).

The personal data provided to us by you or by our partners for the above purposes are processed on the basis of the authorisation under Article 6(1)(b) of the GDPR, in accordance with the employment contract concluded or to be concluded with you.

However, in the employment context, we have a number of legal obligations (e.g. under the Labour Code, tax and social security legislation) that we need to process your personal data to fulfil. In the context of fulfilling these legal obligations, we process your personal data on the basis of the authorisation under Article 6(1)(c) GDPR in accordance with the relevant legislation.

The scope of the personal data processed on the above legal bases and the details of the corresponding legal basis are also set out in Annex 1.

Article 6(1)(a) of the GDPR also allows processing based on consent. This legal basis is rarely used in the context of an employment relationship, but it may occur. Refusal of consent in these cases should not result in any disadvantage for you. If you wish to withdraw your consent at a later stage, you may do so at any time without giving any reason. You will not suffer any adverse legal consequences as a result of withdrawing your consent. However, the withdrawal of consent shall not affect the lawfulness of the processing which preceded it. You may communicate the withdrawal in the same way as you gave it or to your line manager or to the person exercising the authority of the employer.

The processing is based on your consent, for example:

- capture and publish a picture or video of you at a team building event;
- provide us with a menu of your choice at the event;
- provide us with marketing materials (e.g. company T-shirt) provided to you, e.g. clothing size;
- persons to be notified in case of an accident and their contact details;
- etc.

The processing may also be based on the legitimate interest of our company or a third party (Article 6(1)(f) GDPR).

Our company does not monitor the social media activity of employees, however, in the event of an indication of content posted by employees that is harmful to the legitimate economic interests or reputation of our company, we may, in our legitimate interest, view the employee's public communication (photo, post, comment, etc.). It is in the legitimate interest of our company to protect the reputation and trade secrets of our own and our business partners. The monitoring concerns data that the data subject himself has made publicly available to anyone, so that his privacy may be slightly compromised.

Duration of processing

Type of data	Retention period
personal data necessary for the preparation of an employment contract	If the employee wishes to enter into a contract with Pannon-Work, a draft contract will be prepared and if the contract is not concluded within 60 days of the receipt of the personal data by Pannon-Work and the applicant does not request an extension of the deadline, Pannon-Work will delete the personal data processed in this context. The 60-day period starts with the submission of the data transfer consent form in the case of a data transfer from the prospective leaser partner. Pannon-Work will also delete the personal data if the prospective employee declares before this period that he or she does not wish to enter into a contract.
employment contracts, time sheets and pay slips	These documents and the data contained therein will be retained until the end of 5 years after the employee concerned reaches the retirement age pursuant to Section 99/A of Act LXXXI of 1997 on Social Security Pension Benefits (Act on Social Security Pensions).
application for additional leave in the case of the birth of a child, a copy of the child's birth certificate, a copy of the death certificate in the case of stillbirth	the retention period for accounting documents pursuant to paragraph (5) of Article 1 of Government Decree 350/2014 (XII. 29.) on the use of paternity leave and the reimbursement of expenses related to paternity leave in the event of the birth of a child, i.e. 8 years
additional supporting documents (e.g. employee declarations for payroll), returns, data sheets, etc., on which the tax and tax advances are based	the right to tax assessment is time-barred, which, as a general rule, expires 5 years after the last day of the year in which the tax was due or, failing this, was payable (Art. 202-203)
Other employment documents,	until the expiry of the limitation period under labour law

declarations (e.g. aptitude statements)	(3 years as a general rule) (Section 286 of the Labour Code).
Data that we process on the basis of your consent (e.g. your photo, personal data provided in connection with a company event, etc.)	We will process it until your consent is withdrawn or the purpose of the processing ceases.

After the expiry of the above retention period, the document or personal data concerned will be destroyed. A record of the fact and date of destruction will be kept.

### **3. Who can access your personal data?**

Your personal data relating to your employment relationship are primarily accessible to our employees who perform employment-related tasks, as well as to our company's management and the relevant employees of our lending partner (HR, supervisor, etc.). The data stored electronically by us may also be accessed for IT purposes by our company's IT staff, system administrators.

Our lending partner will obtain some personal data (name, mother's name, date and place of birth, place of residence, tax identification number, data on education, training, experience if necessary for the job, salary data) from us, while other personal data will be collected directly by our lending partner (working hours, data on work accidents, etc.).

Your contact details may also be disclosed to your supervisor or the contact person acting on behalf of the leaser, if necessary, to ensure that they can communicate with you effectively and smoothly.

In the event that we pursue a legal claim against you, we will transfer your relevant personal data necessary for the enforcement of the claim to the lawyer or law firm instructed to pursue the claim on the basis of our legitimate interest in pursuing the claim.

We will disclose your personal data to courts, prosecutors, other authorities in the context of our legal obligations or in the case of a claim, to the extent and in the manner appropriate to our legitimate interest.

The members of the Pannon-Work group of companies also operate a quality management system (ISO 9001), Pannon-Work School Co-operative, Meló-Club Work Organisation Social Co-operative, Work for All Social Co-operative, HelpfulFirst Social Co-operative, Pannon-Work Future Home with Young Children Co-operative and Pannon-Work Silver Public Interest Pensioners Co-operative. the EMT Zrt. (2040 Budaörs, Muskátli utca 3.). In this context, the persons representing EMT Zrt. are entitled to inspect the documents and systems of the company they are examining, which are relevant for the certification. The certifying companies do not use the data for their own purposes, they are only entitled to access them for the purpose of quality certification of the respective member of Pannon-Work.

If a relevant member of the Pannon-Work group of companies is audited, the auditing company or its employees are entitled to inspect the documents of the audited company and to make and process copies necessary for the audit.

Pannon-Work specific member	Audit firm
Pannon-Work Zrt. HUNAM Personnel Solutions Ltd. MELÓ-CLUB Social Cooperative for Work Organisation Work for All Social Cooperative HelpFirst Social Cooperative Arrabona Work Ltd. Telekontakt Ltd. GamaxMédia Ltd.	Pannónia Auditing Limited Liability Company (HU-9027 Győr, Budai utca 5/a.)
Gamax Ltd.	"EXPERT" Auditing and Consulting Limited Liability Company HU-2500 Esztergom, Révész Béla utca 7.

#### Our data processors

We may use processors to carry out certain processing operations related to the above processing. The processors will act in accordance with the law and our instructions when carrying out the processing operations.

We reserve the right to involve additional data processors in the future, which we will inform you of by amending this notice.

The data processors we use and their tasks:

The data processor	Data processor for which the data subject performs a data processing task	Activities carried out by the processor in relation to the processing
EDUTAX Ltd. headquarters: 9027 Győr, Budai út 5/a Contact: <a href="http://www.edutax.hu">www.edutax.hu</a>	MELÓ-CLUB Social Cooperative for Work Organisation Work for All Social Cooperative Helping-Heart Social Cooperative Telekontakt Marketing Ltd. Arrabona-Work Ltd.	Activity: payroll, social security administration
HR-FACE Ltd. 8000 Székesfehérvár Seregélyesi u. 113.	Pannon-Work Zrt. Gamax Ltd. HUNAM Personnel Solutions	Activity: payroll, social security administration

Contact: <a href="http://www.hr-face.hu">www.hr-face.hu</a>	Ltd.	
Bearmentor Ltd. headquarters: 9027 Győr Budai u. 5/a .contact: +36-70-9452-218	Pannon-Work Zrt. Work for All Social Cooperative Meló-Club Social Cooperative for Work Organisation Helping-Heart Social Cooperative Gamax Ltd.	Activity: occupational safety and health
Iron Mountain Hungary Ltd. seat: 1093 Budapest, Czuczor utca 10. IV. and V. Contact: <a href="http://www.ironmountain.hu">www.ironmountain.hu</a>	all members of the Pannon- Work group of companies	Activity: document destruction
Travel Online Kft. head office: 2800 Tatabánya Dózsa Gy. út 36.	the Pannon-Work Zrt. HUNAM Personnel Solutions Kft. Telekontakt Marketing Kft. Arrabona-Work Kft. Parisatis Kft.	Activity: provision of cloud-based property management software

## 4. Data security

In order to maintain the security and confidentiality of the data we process and to prevent the destruction, unauthorised use or alteration of the data, we apply the following IT and other data security and organisational measures in particular. In addition, we shall at all times keep abreast of technical developments and available technical, technological and organisational solutions and shall apply solutions appropriate to the level of protection required for our data processing.

Personal data relating to the employment relationship are processed both on paper and electronically.

When storing documents containing personal data on paper, we ensure that they are kept confidential (lockable cabinets) and that they are kept intact and legible (protected from sunlight, heat and water). Archived documents containing personal data are stored in an orderly manner in lockable cabinets or in an office to which employees who are authorised to handle the documents stored there have a key. In the absence of the employee authorised to handle the files, no other person may be present in the premises concerned. The last authorised employee leaving the

room shall ensure that no unauthorised person remains in the room after leaving and shall lock the door.

In the context of the above, we set up separate user accounts (privileges) with individual password protection for software to ensure that everyone has access to only the amount and type of data they are entitled to. We ensure that data is backed up to ensure that it remains authentic and unaltered and that the original data can be restored in the event of destruction or alteration.

## **5. HANDLING DATA BREACHES**

All employees are required to notify us immediately if they become aware of a data breach. A data breach is any incident whereby personal data is accessed by an unauthorised person or is destroyed, lost or altered, for example, if our systems are hacked or stored employment contracts are destroyed or a company mobile phone or laptop disappears.

In the event of a data breach, we will assess the impact and risks (what data is affected, how much, whether it can be recovered, etc.) and take the necessary steps to remedy the situation without delay. Within 72 hours of becoming aware of the incident, we will report the incident to the data protection authority or, in case of high risk, if it is not possible to inform data subjects directly, we will publish a notice of the incident on our website. We also keep records of data breaches in the detail required by law.

## **6. Your rights**

### **Withdrawal of consent**

As described above, the processing of data at the workplace is limited to data processing based on consent. However, if this is the case, you have the right to withdraw your consent at any time without giving any reason. Once consent is withdrawn, the personal data of the data subject will no longer be processed and will be deleted. Withdrawal of consent shall not affect the lawfulness of the prior processing.

### **Request for information / Right of access**

The 1. At any time, you can use the contact details provided in point 1 to ask us whether we are processing your personal data and, if so, to provide you with further information about: *the purposes and legal basis of the processing, the personal data we process, the categories of personal data we process, the recipients or categories of recipients (including data processors we use) to whom or which we have disclosed or will disclose the personal data (in the case of transfers to third countries, the safeguards to ensure adequate protection of the data), the legal basis for the transfer, the duration of the storage of the data, the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data, the right to lodge a complaint with the NAIH, the source of the data, the circumstances of the incident, its effects and the measures taken to remedy it.*

We will also provide you with a copy of the personal data we hold about you together with the information. The first copy is free of charge, but we are entitled to charge a reasonable fee for each additional copy. The amount of this charge will be notified to you in advance.

#### Right to rectify, supplement or amend

If you become aware that any of your personal data is incorrect, inaccurate or incomplete, or if your personal data has changed in the meantime (name change, change of address, birth of a child, etc.), please provide us with the correct, changed or additional data as soon as possible so that we can make the correction or completion.

#### Right to erasure of your personal data ("right to be forgotten")

You have the right to request the deletion of your personal data. Please note that we may refuse to erase your data in particular if we need or may need it to comply with a legal obligation or to enforce a claim.

In the case of data processing based on consent, the withdrawal of consent also implies the deletion of the data. In the case of processing based on legitimate interest, objection to processing shall also entail the erasure of the data, unless there are overriding reasons why erasure cannot be carried out.

#### Cancellation is also possible if

- (a) the data are no longer necessary for the original purpose of the processing;
- (b) the processing of the data is unlawful;
- (c) we are required by European Union or national law to erase it.

#### Protest

In the case of processing based on legitimate interest, you may object to our processing if you consider that the processing is prejudicial to you. If you object, we will delete your personal data, except where it is necessary for the purposes of an overriding legitimate interest.

#### Restrictions on data processing

In the course of the processing, you may request the restriction of processing if (i) you have made a request for rectification of personal data and time is needed to assess the accuracy of the data; (ii) the processing is unlawful but you object to the deletion of the data; (iii) you need the data to exercise or defend a legal claim and we should delete the data because the original purpose of the processing has ceased to exist; (iv) you have objected to the processing and time is necessary to assess whether there are other important reasons why the deletion should not be carried out.

During the period of restriction, we will only store the data and will not carry out any other processing operations on it, unless you consent to further processing or unless such further processing is necessary to protect your rights, the rights of a third party or is in the public interest.

In the event of a restriction of processing, you will be informed in advance of its lifting.

#### Right to data portability

Where we process your personal data by automated (i.e. electronic) means on the basis of your consent or on the legal basis of the performance of a contract (e.g. an employment contract), you may request that we provide your personal data in a commonly known and easily usable electronic format to you or a person you designate. For example, under data portability, you may request us to carry data about you in our personnel and payroll systems.

## **7. Submitting and responding to requests**

If you wish to exercise any of the above rights, please make your request in writing, preferably in person at one of our offices or by sending it to your employer at the address in section 1 of this notice. In the letter, please also include your personal identification details and your postal address. If we have any doubt about your identity or if the information provided is not sufficient to identify you, we are entitled to ask you for additional identification information.

Your request will be fulfilled within 1 month. If necessary, we are entitled to extend this period by a further 2 months and will send you a reasoned decision.

Valid requests will be granted free of charge. However, if the request is manifestly unfounded or excessive, in particular because of its repetitive nature, we are entitled to charge a reasonable fee or even refuse to act on the request.

We will inform all those to whom we have disclosed the data concerned of the rectification, erasure or restriction of the data, unless this proves impossible or involves a disproportionate effort. At your request, we will inform you of the recipients to whom we have communicated or informed as described above.

## **8. Compensation, damages**

If we cause damage to you or to another person by unlawful or unsecure processing of your personal data, you or the person who has suffered damage may claim against us. And if we infringe your privacy rights in this context, you are entitled to claim damages.

Please note that we are not liable to pay compensation or damages if the damage can be proven to have been caused by an unavoidable external cause outside the scope of data management or if the damage is the result of your intentional or grossly negligent conduct.

## **9. How to make a claim**

### **9.1. Contacting the Data Controller**

If you consider that we are not acting lawfully in processing your personal data, please first communicate your comments or requests to us as the data controller at one of our contact details indicated in point 1, so that we can process and handle your comments as quickly and efficiently as possible.

Please note that you can also contact the Data Protection Officer, in the case of the Pannon-Work group of companies, Beáta Torma at [adatvedelem@pannonwork.hu](mailto:adatvedelem@pannonwork.hu)

## 9.2. Recourse to the courts

You are also entitled to pursue your claim in court. Certain courts have jurisdiction to hear the case. You can bring your claim before the court where we are based or before the court where you live or reside.

## 9.3. Referral to the data protection authority, lodging a complaint

In the event of unlawful data processing, you are also entitled to turn to the National Authority for Data Protection and Freedom of Information (NAIH) and initiate its proceedings.

Website: <http://naih.hu>

address: 1055 Budapest, Falk Miksa utca 9-11.

postal address: 1363 Budapest, Pf.: 9.

Budapest, 2024.02.05.

Pannon-Work group of companies  
data controller

**1. ANNEX NO.**  
**DATA MANAGEMENT AT WORK**  
**THE PERSONAL DATA PROCESSED AND THE LEGAL BASIS FOR PROCESSING**

**Employee identification, document verification**

To verify your identity and to check the accuracy and authenticity of the personal data provided, you must present your identity documents to our company's administrator when concluding an employment contract and when notifying any changes to your personal data.

Identification is carried out by the administrator on the basis of the presentation of documents by inspection, while verification of the accuracy and authenticity of the data is carried out primarily by inspection.

We can make a masked copy of your identity documents to ensure the accuracy and subsequent verification of the recording. A masked copy means that only the personal data that the employee is otherwise obliged to provide to our company can remain legible/recognisable on the copy. The copy is thus made solely for the purpose of verifying the accuracy of the data recording and for subsequent verification.

Data content of the masked copy:

<b>Identity card</b>	<b>Driving licence*</b>	<b>Address card</b>	<b>Tax card</b>	<b>Social security card</b>
surname and given name birth name, place and date of birth, nationality, mother's name at birth, gender	surname and given name, place and date of birth, nationality	surname and given name, place and date of birth, mother's name, place of residence and domicile	surname and given name, mother's name, place and date of birth, tax identification number.	surname and given name, date of birth, Social security number

*\*For all employees for whom the existence of a driving licence is a job requirement (drivers, salespersons): driving licence number, category validity, restriction code.*

**Employee registration with tax and social security authorities**

Our company employing you, as the employer, must report the following information about you to the state tax and customs authority (National Tax and Customs Administration) prior to employment, pursuant to Annex 1, point 3 of the CL Act of 2017 on the Rules of Taxation (Art.) (or prior to 1 January 2018, pursuant to Section 16 (4) of Act XCII of 2003 on the Rules of Taxation (old Art.)) (legal basis):

- surname and given name,

- tax identification number,
- date of birth,
- the start, code and termination of the insurance relationship,
- the period of interruption of the insurance,
- weekly working hours,
- FEOR number,
- Social security number,
- and if the insured person does not have a tax identification number: his/her name and surname at birth, place of birth, mother's name and surname at birth and nationality of the insured person,

The tax authority, as the gateway to the one-stop-shop system, transmits the data set out in points 6-7-8 of Annex 1 to the Art. 1 to the *health insurance insurance register*, the *register of the state vocational training and adult education body operating the career tracking system* and the *labour authority*.

At the request of the leaser, we are obliged to provide him/her with a copy of the notification pursuant to Section 217 (4) a) of the Labour Code.

In accordance with Art. 78 of the Tax Code, our company will keep the tax filing documents until the right to assess the tax has expired.

Our company also notifies the state tax authority of the termination of employment, indicating the date of termination of the insurance relationship.

#### **Processing of data relating to previous employment**

When the employment contract is concluded, the employee's exit papers from his/her previous employment are taken over: the data sheet on the maintenance obligations determined by the court order, the certificate of termination of employment, the social security booklet. In the event of termination of employment, we will also issue and hand over to you the statutory certificates relating to the termination of your employment relationship, in accordance with Article 80(2) of the Labour Code.

We also need to process information about your previous employment, whether you worked on loan during the previous 6 months and, if so, for how long with the company to which you would be loaned (Section 214 (2) of the Labour Code).

#### **Social security small book**

Pursuant to the provisions of Government Decree 217/1997 (XII. 1.) on the implementation of the Compulsory Health Insurance Act (Ebtv. Vhr., legal basis), you as the insured person must provide the form "Certificate of Insurance Status and Health Insurance Benefits" (commonly known as the Social Insurance Booklet) to our company when you establish employment. Our company will record the start of the insurance relationship in the Social Insurance Booklet and will keep it until the termination of the employment relationship.

When the employment relationship ends, we will record the termination of the insurance relationship in the Certificate and the fact that the form "Certificate of Income for the Determination of Health Insurance Benefits" (certificate of income) was issued, and we will hand over the social insurance booklet to you as an employee on the day of the termination of the

insurance relationship [Ebtv. If a new insured relationship is established during the period of employment, the new employer will enter the insurance data in the social insurance booklet as described above and return it to us.

### **Medical examination (occupational medical fitness)**

Before the employment relationship is established, as well as periodically and after a longer period of absence, a medical examination of fitness for work is carried out (pursuant to Articles 4, 6 and 7 of Decree 33/1998 NM). The medical data obtained during the medical examination are known and kept by the company doctor. Our company and the borrowing employer ***will only be informed whether or not you as an employee are qualified*** (not/periodically not qualified) ***for the job for*** which the lessor wishes to employ you.

The aptitude test is necessary (purpose) to enable the borrowing employer to ensure safe and healthy working conditions, working conditions and working hours (§ 51 (4) and § 60 of the Labour Code).

The occupational medical certificates issued by the occupational physician are kept for 3 years after the failure (if not complied with) or termination of the employment relationship for use in legal claims.

### **Data processing related to the performance of a contract**

In order for our company as an employer to be able to ensure the rights arising from the employment contract and to fulfil the obligations set out in the employment contract, the following personal data about you as an employee must be processed during the establishment, maintenance and termination of the employment relationship:

Personal data	Relevant section of the Labour Code
<p><b>Usual personal data related to the employment contract or the hiring:</b></p> <ul style="list-style-type: none"> <li>- surname, first name</li> <li>- surname and given name at birth</li> <li>- mother's maiden name and first name</li> <li>- place and date of birth</li> <li>- permanent residence, domicile</li> <li>- job title</li> <li>- basic salary</li> <li>- additional rental elements</li> <li>- place of work</li> <li>- working hours</li> <li>- duration of employment (fixed term / indefinite)</li> <li>- starting date of employment</li> <li>- working hours</li> <li>- the fact and duration of the probationary period</li> <li>- employee signature</li> <li>- notice period</li> <li>- severance pay rate</li> </ul>	<p>Mt. § 45 (on the mandatory content of employment contracts)</p> <p>Mt. § 34 (2) (on the minimum age of workers)</p> <p>Mt. § 48 (on the fixing of the starting date of employment)</p> <p>Mt. § 218 (3) (information before hiring out)</p> <p>§ 99/A of Act LXXXI of 1997 on Social Insurance Pension Benefits (Act on the Certification of Length of Service)</p>

<b>Fact and date of termination of employment</b>	
<b>Contact details</b> <ul style="list-style-type: none"><li>- postal address</li><li>- e-mail address</li><li>- phone number</li></ul>	Mt. § 6 (2) (on the duty to cooperate)
Declaration of employment with another employer or intention to start employment with another employer	Mt. § 8 (1) (protection of the employer's legitimate economic interests) For employees under 18 years of age, Mt. 114. § (2)
Existence, number and category of driving licence, depending on the job	Mt. § 10 (1) (declaration relevant to the employment relationship)
Fact of pregnancy, duration	Mt. § 10 (1) (relevant for employment) Mt. § 53 (3) (work at another place of work) Mt. § 65 (3) (prohibition of dismissal) Mt. § 113 (1) a) (different rules for working and rest periods)
The fact and duration of a female employee's legal treatment in connection with human reproductive procedures	Mt. § 10 (1) (relevant for employment) Mt. § 55 (1) (certified absence) Mt. § 65 (3) (prohibition of dismissal)
existence and date of birth of a child under 3 years old	Mt. § 53 (3) (work at another place of work) Mt. § 66 (6) (notice limit) Mt. § 113 (1) a) (different rules for working and rest periods)
Existence and date of birth of a child under 16	Mt. § 53 (3) (work at another place of work)
The fact of raising a child alone	Mt. § 53 (3) (work at another place of work) Mt. § 66 (6) (notice limit) Mt. 113 (1) b) (different rules on working time and rest periods) Mt. 113 (5) (different rules on

	working time and rest periods)
The fact that the worker's relative is in long-term personal care	Mt. § 53 (3) (work at another place of work)
<b>Leave, sick leave records</b>	Mt. § 134 (records of working and rest time)
<p>We process the following personal data in connection with the use of sick leave and additional leave, paternity leave, parental leave, maternity leave and unpaid leave within the legal framework set out in the Labour Code:</p> <ul style="list-style-type: none"> <li>- Data content of the certificate of incapacity to work (own or child's medical certificate) in case of sick leave</li> <li>- Data required for the purpose of the compensatory leave <ul style="list-style-type: none"> <li>- the name, date of birth, details of the disability of the child under 17 and a copy of the decision on the increased family allowance to prove it</li> <li>- information that the worker is disabled, entitled to disability allowance or entitled to a personal allowance for the blind and a copy of the relevant decision to prove this</li> </ul> </li> <li>- When taking maternity and unpaid leave <ul style="list-style-type: none"> <li>- expected date of delivery</li> <li>- the fact of the child's treatment in a premature infant care institution, the date of discharge</li> <li>- the fact of stillbirth of the child, date of death</li> <li>- the fact and date of the child's temporary placement, temporary or permanent foster placement and placement in a residential social institution for more than 30 days</li> <li>- the duration of the payment of childcare allowance, childcare assistance - in the case of unpaid leave for the personal care of a child under 10 years of age</li> <li>- the fact of personal care for a relative in the case of unpaid leave taken for this purpose</li> <li>- the fact and duration of actual voluntary military service in the reserve, in the case of unpaid leave on that basis</li> </ul> </li> <li>- In the case of paternity or parental leave: name of the applicant, place and date of birth, name and date of birth of the child, number and date of the adoption order,</li> </ul>	<p>Mt. § 118 (additional leave, paternity leave)</p> <p>Mt. § 118/A (parental leave)</p> <p>Mt. § 120 (additional leave)</p> <p>Mt. § 126 (sick leave)</p> <p>Mt. § 65 (3) (prohibition of dismissal)</p> <p>Mt. § 127-132 (rules on maternity and unpaid leave)</p>

number of the birth certificate,	
<b>Additional information not previously mentioned if proof of absence is provided</b> <ul style="list-style-type: none"> <li>- in the event of incapacity for work or other incapacity to perform the job for health reasons, the fact and duration of such incapacity,</li> <li>- treatment in a health establishment in connection with the human reproductive process, as defined by law,</li> <li>- attend a compulsory medical examination,</li> <li>- Participation in a blood donation, up to 4 hours,</li> <li>- breastfeeding mothers - one hour twice a day for the first six months of breastfeeding, two hours twice a day for twins, and one hour a day until the end of the ninth month, two hours a day for twins,</li> <li>- two working days on the death of a relative,</li> <li>- the continuation of general school education and, in the case of training or further training as agreed by the parties, for the time necessary to follow the training,</li> <li>- for the duration of their service as a volunteer or establishment firefighter,</li> <li>- at the request of a court or authority, or for the time necessary to attend the proceedings in person,</li> <li>- for up to ten working days a year during the period of preparation of the legal adoption, for the purpose of meeting the adoptable child in person (a certificate issued by the adoption organisation is required),</li> <li>- for a period of absence justified on grounds of special personal, family or unforeseeable circumstances,</li> <li>- for personal care of a relative who needs care for serious health reasons or a person living in the same household as the worker, for a maximum of five working days per year (a doctor's certificate is required).</li> </ul>	Mt. § 55 (1) (certified absence)
Details of any <b>disciplinary action</b> (warning, decision on disciplinary action)	Mt. § 56 (disciplinary rules)
Receipt of rehabilitation benefit or rehabilitation allowance	Mt. § 66 (7) (notice limit)
Has been assessed by a rehabilitation expert as having at least fifty per cent impairment	Mt. § 53 (3) (work at another place of work)

#### Data required for payroll and certain employer contributions

We process the following data/documents for the purposes of payroll accounting in the context of the performance of the employment contract for the fulfilment of social security and tax obligations on the basis of the law:

Personal data	Legal basis for processing
<p><b>Payroll</b></p> <ul style="list-style-type: none"> <li>- basic salary</li> <li>- additional pay elements (bonuses, bonuses, performance pay, fringe benefits)</li> <li>- Working time records</li> <li>- performance data in the case of performance pay</li> <li>- the data content of deductions, garnishments, decisions (e.g. amount of maintenance, amount of damage caused to the employer)</li> <li>- to calculate and declare taxes deducted from wages <ul style="list-style-type: none"> <li>- data provided on the family tax allowance form (employee's name, tax identification number, dependants' names, tax identification number, date of change, title of entitlement, spouse's name, tax identification number, place of residence, mother's maiden name)</li> <li>- data provided on the first marriage benefit form (employee's name, tax identification number, spouse's name, tax identification number, date of marriage)</li> <li>- information needed to claim tax-free schoolstart allowance (entitlement to family allowance)</li> <li>- declarations of membership of voluntary health insurance funds, pension insurance funds</li> <li>- a declaration of receipt of social security cash benefits, the type of benefits, the fact of having at least three dependent children, in order to claim social contribution tax relief,</li> <li>- to claim the employer's tax allowance for young people (duration of previous insurance)</li> <li>- the data required for the assessment of the family tax allowance for mothers under 30 years of age, provided on the tax advance declaration form (name of the employee, tax identification number, tax identification number or fetal status of the child entitled to the allowance, etc.)</li> <li>- data provided on the form for tax relief for young people under 25 (name of the employee, tax identification number, year of submission of the declaration)</li> <li>- Data provided on the tax advance return form for mothers of four or more children (employee's name, tax identification number, children's names, place and date of birth, mother's name, tax</li> </ul> </li> </ul>	<p>Mt. § 134 (working time records)</p> <p>Mt. § 136 - 165 (provisions on wages)</p> <p>until 31 December 2017: the Act XCII of 2003 on the Rules of Taxation (old Art.) after 1 January 2018: CL Act 2017 on the Rules of Taxation (new Art.)</p> <p>Concerning the social security number and the tax identification number in general: Act XX of 1996 on the means of identification replacing the personal identification number and on the use of identification codes (in particular Articles 15, 19, 23, 25)</p> <p>Act LXXXI of 1997 on Social Security Pension Benefits (Act LXXXI of 1997), § 43, § 96 (on the verification of pension entitlement)</p> <p>Act LXXX of 1997 on persons entitled to social insurance benefits and private pensions and on the coverage of these services (Act on Social Insurance Benefits and Private Pensions), § 44 (1) and (3),</p> <p>in relation to certain tax reliefs, Act CXVII of 1995 on personal income tax, Articles 29/A-B (on family tax relief), 29/C (on the initial allowance for first-time married couples), 29/D</p>

<p>identification number)</p> <ul style="list-style-type: none"> <li>- previous exit papers from the workplace</li> <li>- if unemployed, proof of this status</li> <li>- decision certifying the reduced capacity for work of a worker with reduced capacity for work, specialist medical opinion</li> <li>- tax identification number</li> <li>- Social security number</li> </ul> <p>- bank account number</p> <p>- wages paid</p> <p>- citizenship, tax residence</p> <p>- marital status</p> <p>- not</p> <p>- place of residence</p> <p>- pensioner's permanent number (for a retired worker)</p> <p>- pensioner decision</p>	<p>(allowance for mothers with four or more children), 29/E (personal allowance, 29/F (allowance for young people under 25),</p> <p>Chapter IX of Act CLVI of 2011 amending certain tax laws and other related acts on social contribution tax</p>
<p><b>In the case of cost accounting for an own-owned vehicle</b></p> <p>Copy of the receipt confirming payment of the KGFB by the end of 2017</p> <p>from January 2018, a copy of the vehicle registration certificate (or a certificate issued by the transport authority in case of withdrawal)</p>	<p>point 9 of Chapter IV of Annex 3 to the Personal Income Tax Act</p>
<p><b>Travel allowance</b></p> <p>Employee declaration of residence, place of stay, expense account details</p>	<p>§ 7 of Government Decree 39/2010 (in connection with the settlement of commuting expenses)</p>

### Register of social security benefits

Pursuant to Section 80 (1) of Act LXXXIII of 1997 on Compulsory Health Insurance Benefits (legal basis for data management), our company, as an employer, is obliged to keep records and report data necessary for the determination of the cash and accident benefits of health insurance. However, we do not process health data in this context.

In addition, Pannon-Work Zrt., HUNAM Personnel Solutions Kft. and Gamax Kft., as social security payment offices pursuant to the Government Decree 217/1997 (XII. 1.) of 1 December 1997 implementing the Ebtv.

- keep a record of the amount of health insurance cash benefits, sickness benefits, accident benefits, infant care benefits, childcare benefits (benefit diary) and the underlying documentation;
- keeps the documents on which the assessment of an accident at work and occupational disease is based;
- keeps records of sickness contributions, repayments and the underlying documents;

- submits a monthly statement of the cash benefits paid and accident sickness benefits to the government office of its seat (Section 38/A (1) of the Social Insurance Act);
- provide the Health Insurance Fund with information on payments and reimbursements;
- provides other data to the health insurance company's professional and financial control body(ies) (Section 81 (1) of the Health Insurance Supervision Act);
- transmits the data according to the application form for the payment of cash benefits that may be granted on the basis of equity, such as sickness benefit in its own right, childcare allowance, infant care allowance, childcare allowance, to the Health Insurance Fund pursuant to § 50 of Act LXXXIII of 1997.
- Pursuant to Article 80 (4) of Act LXXXIII of 1997 on Compulsory Health Insurance Benefits, our Company is obliged to report the cash health insurance benefits paid after the termination of the insurance ("passive beneficiary") to the metropolitan or county government office acting in the capacity of the competent health insurance fund at its seat;
- Pannon-Work Zrt. and Gamax Ltd. keep a register of the beneficiaries of the benefits with the following content and forward it to the health insurance department of the competent government office: name of the insured, social security number, birth data, mother's name, social security number, data on the child care allowance, pregnancy and child care allowance, data on the children in case of child care allowance, FEOR number and occupation in case of an accident at work.

Data management as a paying agent, including the storage of documents, will continue until the paying agent ceases to be a paying agent in order to allow the competent government office to carry out the final audit. Thereafter, the documents may be destroyed.

### **Data management in relation to occupational safety and health and accidents at work**

#### ***Personal protective equipment register***

The handing over of protective equipment and clothing to workers is recorded in the record. Records of receipt and return shall include the name of the worker concerned, the date of receipt and the name and size of the protective equipment received.

In compliance with Article 3 (3) of Decree 65/1999 (XII. 22.) of the Ministry of Health and Welfare, our company keeps up-to-date records (legal basis) of the documents related to the supply of protective equipment (acceptance reports, return reports) and presents them upon request of the inspecting authority.

#### ***Data processing in the context of an accident at work***

The reporting, investigation and registration of accidents at work and occupational diseases (purpose) is a legal obligation of the party acting as a leaser (legal basis: Articles 64-69 of Act XCIII of 1993 on Occupational Safety and Health and Articles 5-10 of Decree 5/1993 (XII. 26.) of the Ministry of Labour and Social Affairs).

**Both the leaser and the lender must keep a record of** work accidents (if the worker has been unfit for work for more than 3 working days), occupational diseases, and increased exposures, in which we must record the following personal data about the injured worker:

- name (including birth name)
- mother's name
- your social security number (taj number)
- place and date of birth
- not
- citizenship
- place of residence (address)
- the number of accidents at work, starting with 1 each year
- the work of the injured person
- the date, place, nature and brief facts of the injury
- action taken to care for the injured person
- the fact whether the injured person has continued to work
- the serial number in the industrial accident register.

In the case of an accident at work involving incapacity for work, the leaser **is also required to record an accident at work report** and to investigate an accident at work involving incapacity for work that exceeds 3 working days. The opening of an investigation into the accident at work must also be notified to the occupational doctor, who may participate in the investigation at his/her discretion. In the event of a serious accident, the occupational doctor must be involved. A copy of the investigation file shall be given by the leaser to the lender.

The work accident report must be forwarded:

- a) You as the injured person, or in the event of death, your dependants;
- (b) the occupational accident causing death or incapacity for work for more than 3 working days to the occupational safety and health authority competent for the place where the accident occurred;
- c) in the case of posting abroad, to the competent OSH authority of the place of establishment;
- d) to the district (metropolitan district) office of the metropolitan and county government office acting in the capacity of a health insurance fund;
- e) in the case of temporary agency work, to the lending employer.

A serious accident at work must be reported immediately to the occupational safety and health authority (the district office of the competent metropolitan and county government office acting as the occupational safety and health authority), which immediately forwards the report to the Ministry headed by the Minister responsible for employment policy.

When the report of a serious accident at work is sent to the occupational safety and health authority, a copy of the complete documentation of the employer's accident investigation must be enclosed, in particular:

- a) the records of the hearing,
- b) a document proving your professional qualifications,
- (c) a document certifying the right of processing,
- d) a document proving your medical fitness,
- (e) the documentary evidence of the placing in service,
- f) a document documenting the periodic safety review,
- g) a document documenting the risk assessment,
- h) photographs, video recordings,
- i) the relevant parts of the internal rules.

2024.02.05.

Rental