

Data Controller: DHL Global Forwarding Hungary Ltd. (registered office: DHL Building (264), 1185 BUD International Airport, Budapest, Hungary, e-mail: [barnabas.bekesi@dhl.com](mailto:barnabas.bekesi@dhl.com), phone: +3629556000)

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## **PRIVACY NOTICE ON HR-RELATED DATA PROCESSING ACTIVITIES**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of job applicants' data, including the processing of incoming CVs**

Summary table on the processing of job applicants' data						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
For application, selection and contact purposes	Voluntary consent	Any natural person who applies for a job advertised by the Data Controller or who applies for an unadvertised job	See details in the below privacy notice	For the period specified in the consent or until the legitimate interest ceases to exist	Electronically and/ or on paper, manually	Data subjects

1. The Data Controller allows data subjects to apply for jobs advertised by the Data Controller. The data subjects can apply by the means indicated in the job advertisement (e.g. electronically or on paper). The Data Controller also accepts applications for unadvertised jobs ("incoming CVs").

### **What is the legal basis for processing?**

2. The application for a job is based on voluntary consent.

### **Who are the data subjects?**

3. Data subjects: any natural person who applies for a job advertised by the Data Controller or who applies for an unadvertised job.

### **What are the scope and purposes of the data processed?**

4. Scope and purpose of the data processed:
 

name*	identification
place and date of birth	identification
name of position applied for*	to identify the application
special data, such as health data	special data will be processed only if it is necessary for the purposes of assessing the application for the given position
experiences, the name of previous place of work and the period of employment*	for the purposes of assessing the application for the position

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experiences – description of the position*	for the purposes of assessing the application for the position
educational level*	for the purposes of assessing the application for the position
foreign language knowledge, foreign language and level of knowledge *	for the purposes of assessing the application for the position
other information on the CV	for the purposes of assessing the application for the position
attached cover letter	for the purposes of assessing the application for the position
consent to the processing of the data for 2 years after the application if the data subject's application has been unsuccessful	necessary to prove the legal basis of the processing in case of an unsuccessful job application

### **What is the purpose of the processing?**

5. The purpose of the processing is to enable the job application and selection process as well as to maintain contact with the applicant.

### **How is the data processed?**

6. The activities and processes related to the data processing are typically, but not exclusively as follows:
  - a. The Data Controller advertises the job. The job advertisement includes a privacy notice and reminds the data subjects not to send personal data that are not relevant.
  - b. The data subject sends his/her data to the Data Controller by the means specified in the job advertisement, for example on paper or electronically, typically by e-mail.
  - c. During the selection process, the Data Controller will assess the applications considering the requirements for the position to be filled and the conditions for the establishment of the employment/other

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legal relationship (if the application was made in response to a published job advertisement). Based on this assessment, the Data Controller invites the most suitable persons for a personal interview. If the application was not made in response to a publicly available job advertisement, the Data Controller considers the application and therefore uses the personal data as well as the option for a personal interview.

- d. The selection process continues with the personal interview and, where applicable, the completion of an aptitude test.
- e. In the event of selection, if moral character is relevant for a position for which the data subject applied for, the candidate obtains a certificate of moral character. The selection process shall end with the Data Controller making contract with the data subject. The Data Controller may process the data of data subjects who have not been selected for the given position only if the data subject has given his or her specific consent to the processing, has made a specific, verifiable request to that effect.
- f. The Data Controller shall notify the data subjects (the applicants) about the result of the selection process. If the data subjects have not previously given such consent, the Data Controller requests their consent to further processing of their data for 2 years after the application for the same or similar job application or for the purpose of an application which corresponds to the competences of the data subjects.
- g. The Data Controller shall connect the data subjects' consents with the data processed about them and store these consents.
- h. The data subject acknowledges that, where he or she has provided a reference person when applying for a job, the Data Controller may contact that person to verify the professional experience of the data subject.

### **How long does the processing last?**

7. Duration of the data processing:
  - a. based on the consent of the data subject whose job application has been unsuccessful, for the period specified in the data subject's consent after the application; or
  - b. until erasure at the request of the data subject, in which case the data shall be limited until the legitimate interest of the Controller ceases to exist,
  - c. the Data Controller shall process (store) the data of unsuccessful and non-consented data subjects for 3 years after the purpose has been achieved (position filled) for its legitimate interest, particularly

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to enable the Data Controller to prove lawful and fair processing in case the authority responsible for dealing with complaints on unequal treatment and implementing principles of non-discrimination initiates proceedings against it.

### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

9. Data source: directly from the data subject.

### **Do we disclose data to third parties?**

10. Data disclosure: the data of the data subjects whose application has been unsuccessful will not be disclosed to third parties. The data of the data subjects who successfully applied as defined by law (e.g. CL Act of 2017) will be transferred to the data processor in charge of accounting/payroll processing as defined in Annex II. The Data Controller informs the data subjects accordingly and registers the data subject by the tax authority, which registration constitutes a data transfer.

### **How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed: please see separate chapter for details.

### **Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### **Other**

13. Regarding the data marked with \*, the Data Controller draws attention to the fact that if the data subject does not provide them to the Data Controller, the Data Controller refuses to provide the service (data processing).

Annex II:

Data Processors:

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

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DHL Supply Chain Hungary Kft. payroll service provider (Cg. 13-09-084532; registered seat: Zöldmező út 2., 2225 Üllő, Hungary) and NEXON Kft. (Cg. 01-09-062647; registered seat: Váci út 185., 1138 Budapest, Hungary) - providers of the Data Controller's cafeteria and payroll data recording system.

Data may be transferred to authorities, courts if necessary.

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## **Booking of appointments for job interviews**

*The processing of data is independent of the way in which the appointment is made (through which forum. The purpose of the processing is to provide the data subject with an appointment for a job interview.*

Summary table of the processing of appointments (booking of appointments)						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Provision of an appointment for a job interview to the data subject	based on voluntary consent or agreement	All job applicants with whom the Data Controller arranges an appointment for a job interview	See details in the below privacy notice	See details in the below privacy notice	electronically and/or on paper, manually	Data subjects

1. The Data Controller allows data subjects to make an appointment with the Data Controller for a job interview by providing the following data.

### **What is the legal basis for processing?**

2. The data processing related to the arrangement of an appointment is
  - a. based on voluntary consent, or
  - b. it can be interpreted that the legal basis for the processing is GDPR Article 6(1)(b), given that the appointment is necessary to take steps at the request of the data subject prior to the conclusion of the contract between the data subject and the Data Controller.

### **Who are the data subjects?**

3. Data subjects: all job applicants with whom the Data Controller schedules an interview.

### **What are the scope and purposes of the data processed?**

4. Scope and purpose of the data processed:
 

name*	identification
phone number*	for contact purposes
e-mail address	for contact purposes
date*	necessary for the provision of the service

### **What is the purpose of the processing?**

5. The purpose of the processing is to provide the data subject with an appointment for a job interview.

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### **How is the data processed?**

6. The activities and processes involved in the processing are typically, but not exclusively, the following:
  - a. The data controller, as a step in the selection process, makes appointments - usually by telephone - with job applicants who appear suitable for a given position based on their CVs and other documents sent.
  - b. The Data Controller shall record the data revealed to the Data Controller during the appointment process in an electronic record system and/or on paper as well as to confirm the booked appointment to the data subject orally and/or in writing.
  - c. Ideally, the data subject will appear in person at the time of the appointment at a location agreed with the Data Controller so that the data subject and the Data Controller can achieve the specific purpose of the appointment.

### **How long does the processing last?**

7. Duration of processing:
  - a. if the appointment has been unsuccessful (the data subject did not appear), until the purpose is achieved,
  - b. if the data subject attended the job interview, the data will be processed for 6 months for future evidentiary purposes and then deleted.

### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

9. Data source: directly from the data subject.

### **Do we disclose data to third parties?**

10. Disclosure of data: none.

### **How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed: see the introductory text of the Data Controller's Privacy Notice.

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### **Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### **Other**

13. Regarding the data marked with \*, the Data Controller draws attention to the fact that if the data subject does not provide them to the Data Controller, the Data Controller refuses to provide the service (data processing).

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## **Processing of data relating to aptitude tests**

Summary table of data management for aptitude tests						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Assessment of professional aptitude (competences) necessary for the exercise a right or perform an obligation laid down in the rules governing the legal relationship	voluntary consent or legitimate interest	All natural persons taking part in an aptitude test	See details in the below privacy notice	Until a request for erasure, or until the time specified in the consent or until the statute of limitations expires	electronically and/or on paper, manually	Data subjects

1. There are basically 2 types of aptitude tests:
  - a. required by an employment rule, or
  - b. not required by an employment rule, but a particular competency test is necessary to exercise a right or perform an obligation specified in the employment agreement / rules of the employment.

*The present processing covers the process of the Data Controller in relation to the examinations falling within the scope set out in point 1.b and does not deal with those aptitude tests (e.g. medical examination) which are required by law.*

### **What is the legal basis for processing?**

2. The processing of data relating to aptitude tests is based on voluntary consent. If this legal basis is not applicable, the processing is based on the legitimate interest of the Controller.

### **Who are the data subjects?**

3. Data subjects: all natural persons undergoing an aptitude test.

### **What are the scope and purposes of the data processed?**

4. Scope and purpose of the data processed:
 

name*	identification
phone number*	for contact purposes
e-mail address	for contact purposes
date*	to determine the date of

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test result                      the aptitude test  
to be considered for the purpose of the job  
application

### **What is the purpose of the processing?**

5. The purpose of the processing is to assess the professional aptitude (competences) required f to exercise a right or perform an obligation laid down in the rules governing the legal relationship.

### **How is the data processed?**

6. The activity or process involved in the processing is typically, but not exclusively as follows:
  - a. The Data Controller selects - on the basis of a balancing of interests test - the aptitude test(s) most suitable for the position in question, which is/are the one(s) most suitable to assess only professional competence.
  - b. The Data Controller shall explain in detail to the data subjects the circumstances in which the aptitude tests are carried out, how they work, how and what exactly they measure and what results the data subject can obtain.
  - c. The Data Controller shall request the explicit, prior, written, and voluntary consent of the data subjects to participate in the aptitude tests.
  - d. The results of the aptitude test shall be evaluated by the Data Controller's staff member in charge of this task and communicated to the data subjects in detail and in full in plain, simple language.
  - e. The data subject may also decide, in the light of the results, not to proceed with the selection process, to have the test results and other data deleted by the Data Controller, or the data subject may exercise other rights. The Controller shall act in accordance with the data subject's request.

### **How long does the processing last?**

7. Duration of the processing:
  - a. until erasure at the request of the data subject, or
  - b. where the data subject's application for a position at the Data Controller has been unsuccessful but the data subject consents to the continued storage of his or her data, until the time limit specified in the consent; or

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- c. if the data subject becomes an Employee, until the statute of limitations period (for future evidentiary purposes).

### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

9. Data source: directly from the data subject.

### **Do we disclose data to third parties?**

10. Disclosure of data: not disclosed to third parties.

### **How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed: see separate chapter.

### **Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### **Other**

13. Regarding the data marked with \*, the Data Controller draws attention to the fact that if the data subject does not provide them to the Data Controller, the Data Controller refuses to provide the service (data processing).

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## **Data processing in connection with language proficiency tests**

Summary table of data management for language proficiency tests						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
To assess the language skills of the applicant concerned, to check the conditions for the position he or she applied for	Voluntary consent	All natural persons who participate in the language proficiency test	See details in the below privacy notice	See details in the below privacy notice	electronically and/or on paper, manually	data subjects

### **What is the legal basis for processing?**

14. Participation in language proficiency tests is based on voluntary consent, but otherwise it is in the legitimate interest of the Data Controller to employ staff with adequate language skills to serve customers and data subjects.

### **Who are the data subjects?**

15. Data subjects: all natural persons taking part in the language assessment test.

### **What are the scope and purposes of the data processed?**

16. Scope and purpose of the data processed:

name*	identification, addressing by name
phone number*	for contact purposes
e-mail address	for contact purposes / to notify the applicant about the test result
date*	to execute the test
test result	assessment of the job application

### **What is the purpose of the processing?**

17. The purpose of the processing is to assess the language skills of the applicant concerned, to check the conditions of the position.

### **How is the data processed?**

18. The activity and process concerned by the processing are as follows:

- The Controller or the Controller's processor selects - based on his professional experience - the language tests that are most suitable to assess the language skills of a data subject.

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- b. The Data Controller shall explain in detail to the data subject the circumstances in which the language tests will be carried out, how and what exactly they measure and what results the data subject will obtain.
- c. The results of the test shall be evaluated by the Data Controller's staff member in charge of this task (or by the Data Processor) and the Data Controller shall communicate them in detail and in full to the data subjects in simple, everyday language.

### **How long does the processing last?**

19. Duration of the data processing:

- a. where the data subject's application for a position at the Data Controller has been unsuccessful but consents to the continued storage of his or her data, until the time limit specified in the consent, or
- b. if the data subject's application is not accepted by the Controller and requests the deletion of the data, until the data are deleted,
- c. if the data subject becomes an Employee, until the statute of limitations of employment law for future evidentiary purposes.

### **How is the data processed?**

20. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

21. Data source: directly from the data subject

### **Do we disclose data to third parties?**

22. Disclosure of data: not disclosed to third parties unless the assessment is carried out by an external data processor, of which the data subject has been informed in advance.

### **How does the Data Controller ensure data security?**

23. Organisational and technical measures to protect the data processed: see separate chapter.

### **Does the controller perform automated decision-making, profiling?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

24. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### **Other**

25. Regarding the data marked with \*, the Data Controller draws attention to the fact that if the data subject does not provide them to the Data Controller, the Data Controller refuses to provide the service (data processing).

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## **Processing Employee personal data: staff records, staff master data**

Staff records, summary table for the management of staff master data						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
To comply with legal obligations, exercise legitimate interest or to act upon a consent	To comply with legal obligations, legitimate interest, agreement, voluntary consent	Staff members (Employees)	See details in the below privacy notice	See details in the below privacy notice	electronically and/or on paper, manually	Data subjects

1. The Data Controller is obliged to collect, record and transfer data to public authorities and other third parties in the event of an insurance relationship - such as an employment relationship, simplified employment or assignment - in accordance with the provisions of the applicable regulations.

### **What is the legal basis for processing?**

2. Legal basis for processing:
  - a. the Section of 46 (2) Act LXXX of 1997
  - b. in Act LXXXI of 1997
  - c. the provision of data to the State Tax and Customs Authority in accordance with Annex 1 of Act CL of 2017, and
  - d. for the data listed below, marked with \*, the data processing is mandatory based on Section 3 and 11 of of Act LXXV of 2010 on Simplified Employment
  - e. for other data not marked with \*, the processing is not mandatory, the legal basis of the processing is the legitimate interest of the Controller or
  - f. voluntary consent of the data subject.

### **Who are the data subjects?**

3. Data subjects: Employees.

### **What are the scope and purposes of the data processed?**

4. Data processed and provided to the state tax and customs authorities in the case of employment: surname and first name of the insured person\*, tax identification number\*, date of birth\*, start date of the insurance\*, code\*, termination date\*, duration of the insurance break\*, weekly working hours\*, FEOR number\*, social security number\*. If the insured person does not have a tax identification number, the surname and

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forename at birth, place of birth, mother's surname and forename at birth and the nationality of the insured person must also be provided\*, bank account number, identity card number, telephone number, e-mail address, personal image of the person concerned, knowledge of foreign languages, job title, job description, managerial assignments, traineeship, examination, probationary period, disciplinary proceedings, penalty, dismissal, salary grade, length of service, period of creditable service, data relating to grading.

5. In addition to the above, the following data are processed in the case of an assignment: gross assignment fee, net assignment fee\*, bank account number, place of assignment.
6. The Data Controller is obliged to keep a register pursuant to Section 46 (2) of Act LXXX of 1997, which contains the name and personal data of the Employee/Client as the insured person, the social security number, the Employer/Client's data, the data on the insurance period and the period of service, the basis and amount of the contributions deducted from the insured person.
7. Regardless of the legal relationship, in addition to the above data, the Data Controller processes the following data for the following purposes and for legitimate interests:

phone number of the data subject	for contact purposes
e-mail address of the data subject	for contact purposes
8. The legitimate interest is that the data subject or the Data Controller has an interest in the Data Controller being able to contact the data subject in connection with the establishment, performance, or termination of the legal relationship.
9. Regardless of the legal relationship, in addition to the above data, the Data Controller may process the following categories of data for the following purposes and with the following legal basis:

health data	to prove reduced capacity for work	to fulfill a legal obligation of the Data Controller (to a public authority)
health data – see in separate data processing	reduced capacity for work	Legitimate interest of the Controller / vital interest of the data subject

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details of liability	proof of liability	Legitimate interest of the Controller / to fulfil a legal obligation
Data on staff member checks/audits	to prove the legality of the check / audit	Legitimate interest of the Controller

### **What is the purpose of the processing?**

10. The purpose of the processing is to fulfil obligations under the law, to pursue a legitimate interest.

### **How long does the processing last?**

11. The Data Controller

- a. shall process data relating to employment law liability during the statute of limitation period (3 years);
- b. shall process data relating to civil liability within the general statute of limitation period (5 years);
- c. shall keep data and documents relating to length of service and earnings (i.e. personal data processed during the establishment, performance and termination of the employment relationship with the data subject, data and documents relating to salary payments and transfers) for 5 years after the retirement age of the data subject, in accordance with the provisions of Act LXXXI of 1997;
- d. shall not discard employment, wage and social security records and contracts being documents of permanent value.

### **How is the data processed?**

12. The activities and processes involved in the processing are typically, but not exclusively as follows:

- a. The data controller informs the data subject that he/she has a statutory obligation to notify the state tax and customs authority of the mandatory data to be provided, which the data subject acknowledges in writing.
- b. If the data subject does not wish to acknowledge or consent to the fulfilment of the statutory obligations, no employment relationship, simplified employment relationship or agency relationship may be established with him/her.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- c. Following the acknowledgement, the data subject, the future employee, shall enter an employment relationship, a simplified employment relationship or a relationship of commission by concluding a contract with the Data Controller, which shall be stored by the Data Controller in accordance with the Data Controller's Records Management Policy.
- d. The Data Controller notifies the competent first-level state tax and customs authority by electronic means or by means of the form provided for this purpose - i.e. by communicating the data to be provided to the Data Controller - in order to comply with the legal obligations, by communicating its own tax identification number, name, designation, registered office, place of business, domicile, as well as the name and tax number of its predecessor in title, and thus by transmitting the data.

13. The Data Controller shall also record the data processed for legitimate interest and process them until the legitimate interest ceases to exist.

#### **How is the data processed?**

14. Data processing methods: electronically and on paper, manually.

#### **Where did the data come from?**

15. Source of data: directly from the data subject, sometimes from other staff member.

#### **Do we disclose data to third parties?**

16. Disclosure of data: to public authorities (national tax authority, NAV), to a data processor, in this case the person is named in Annex II.

#### **How does the Data Controller ensure data security?**

17. Organisational and technical measures to protect the data processed:

- a. In the processing of data by the Data Controller in relation to the Data Controller's Employees, it is necessary to ensure that the data are processed exclusively by such Employee(s), whose processing activity is indispensable for the performance of the specific operations required.
- b. See other rules in separate chapter.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## Does the controller perform automated decision-making, profiling?

18. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### Other

19. Regarding the data marked with \*, the Data Controller draws attention to the fact that if the data subject does not provide them to the Data Controller, the Data Controller refuses to provide the service (data processing).

20. Employees must familiarise themselves with these rules and other relevant internal rules, instructions and other documents on the day on which their employment commences, but not later than the first day of work.

Annex II:

Data Processors:

DHL Supply Chain Hungary Kft. payroll service provider (Cg. 13-09-084532; registered seat: Zöldmező út 2., 2225 Üllő, Hungary) and NEXON Kft. (Cg. 01-09-062647; registered seat: Váci út 185., 1138 Budapest, Hungary) - providers of the Data Controller's cafeteria and payroll data recording system.

Data may be transferred to authorities, courts if necessary.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee data: for payroll purposes**

Data controller performs the payroll tasks itself.

Summary table of payroll data management						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Payroll of the Employer's employees	Fulfillment of legal obligations	Employees	See details in the below privacy notice	Data on earnings and length of service are retained by the Employer for 5 years after the respective retirement age of the Employee concerned	Electronically, on paper, manually	Data subjects

### **What is the purpose of the processing?**

1. Purpose of data processing: calculation of staff salaries and contributions.

### **What is the legal basis for processing?**

2. Fulfilling of legal obligations (GDPR Article 6 (1) c)).

### **What are the scope and purposes of the data processed?**

3. The categories of personal data processed are set out in the following documents used for payroll purposes:
  - attendance sheet or workshop diary: time spent at work
  - work voucher: instruction to work; certifies the work done
  - payroll sheet: monthly salary, deductions, allowances, benefits
  - deduction list
  - pay slip: document used to pay for work
  - payroll sheet: an annual statement of an employee's wages and deductions
  - social security summary: 'social security summary': 'social security summary': 'social security summary': 'social security summary'
  - burial allowance documentation
  - documentation of bonuses
  - study contract and other relevant contracts
4. Typical data sets handled in payroll are:
  - name at birth

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- mother's name
- place and date of birth
- address
- tax identification number
- job title
- social security number
- type of occupation
- legal category of occupation
- cost centre
- FEOR number
- amount of basic salary, basic salary
- title and amount of allowances
- amount of additional pay
- amount of bonus, bonus broken down by period
- titles, rates, and amounts of deductions broken down by month
- titles, amounts of non-regular income
- the amount of the net remuneration payable to the person concerned per month, followed by an annual aggregation of the figures

### **Who are the data subjects?**

5. Data subjects: Employees.

### **How is the data processed?**

6. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

7. Data source: directly from the data subject.

### **How long does the processing last?**

8. Duration of the data processing: data concerning earnings and length of service will be retained by the Employer for 5 years after the age of retirement of the relevant Employee.

### **Do we disclose data to third parties?**

9. Disclosure of data: when and how required by law, e.g. to NAV (tax authority).

### **Other**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

10. The processing also includes that the Data Controller sends the forms to the data subjects for signing and that the signed forms are stored.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing Employee data: management of data of internal trainings, management of documents certifying qualifications obtained**

Summary table of internal training data management						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
To fulfil statutory obligations, proving professional qualifications, and monitoring the training and development of staff	Legitimate interests or legal obligation of the Data Controller	Employees	See details in the below privacy notice	See details in the below privacy notice	Electronically and/or on paper, manually	Data subjects

The Data Controller shall process the data collected during internal trainings based on the provisions set out herein, considering that, among other trainings the employees receive training on fire safety, occupational health and safety, and data protection regulations in force at the Data Controller. In connection with these trainings attendance sheets and minutes are recorded. The Data Controller shall also process the certificates and qualifications of the staff members in accordance with the below rules.

### **What is the legal basis for processing?**

Legal basis for processing:

- a. mandatory by law (e.g. fire safety training, occupational health and safety, training required for the job, reporting of highest qualification to the authority, etc.), or
- b. legitimate interest of the Controller (e.g. data protection training). The Data Controller has a legitimate interest in the continuous development of the knowledge, skills, and abilities of its employees to perform tasks in an increasing quality.

### **Who are the data subjects?**

Data subjects: all Employees of the Data Controller.

### **What are the scope and purposes of the data processed?**

Scope and purpose of the data processed in relation to the education diary:

subject of training

identification

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**



list of participating staff members (attendance sheet)	identification
signature of participating staff members	identification, evidence purposes
date of training	identification
name and signature of trainer	identification

Scope and purpose of the data processed in relation to individual training	
name of Employee	identification
subject of training	identification
date of training	identification
name and signature of trainer	identification

Scope and purpose of data processed in relation to staff certificates and examinations:

name of employee	identification
certificate, examination	
serial number	identification, evidence purposes, reporting to the state tax and customs authorities
certificate, examination	
serial number	evidence purposes in case a public authority requires it, otherwise the Data Controller does not store copies

### **What is the purpose of the processing?**

The purpose of data processing is, on the one hand, to comply with legal obligations, to prove professional qualifications and, on the other hand, to monitor the training and development of the staff.

How is the data processed?

The activity and process concerned by the processing of data in case of internal training is typically, but not exclusively as follows:

The Data Controller announces the dates and times of the internal training events and the Employee is obliged to attend the internal training.

The Data Controller shall record the internal training in an attendance sheet or other document of evidentiary value, signed by the Employee.

If required by the training, the Employee shall take an examination, the results of which shall be recorded by the Data Controller.

The activities and processes involved in the processing of examinations and certificates issued by third parties to the Employee are typically, but not exclusively, the followings:

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- a. The Data Subject presents a certificate or certificate, or attestation of the examination obtained to the Data Controller.
- b. The Data Controller verifies the authenticity of the document, stores its number or other identification data and, if required by law, forwards them to the body or authority specified by law (e.g. tax authority, NAV).
- c. If a labour or other authority may verify the existence of a particular document at the place of work, the Data Controller may make a copy of the document, which shall be stored in accordance with the requirements on data security. Otherwise the Data Controller shall not make copies of the documents.

### **How long does the processing last?**

Duration of the processing: the Data Controller keeps the logbook of the employee's training on work safety, general security and fire protection for 3 years. The Data Controller keeps the data of the employee's individual training logbook, certificates, and examinations (and copies thereof, if necessary) for the duration of the employment relationship, and for legitimate interest, for the subsequent limitation period.

### **How is the data processed?**

Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

Data source: directly from the data subject

### **Do we disclose data to third parties?**

Data disclosure: to authorities, court, certification body if necessary. In case of international training, to the Partner organising the training.

Participants in joint data management in the context of the MyTalentWorld e-learning and objectives registration system:

Deutsche Post AG

53250 Bonn

contact details of the Data Protection Officer:

Gabriela Krader, LL.M

<https://www.dhl.com/hu-hu/home/elolab/helyi-adatvedelmi-nyilatkozat/kapcsolatfelvetel-adatvedelmi-kerdesekben.html>

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

### **How does the Data Controller ensure data security?**

Organisational and technical measures to protect the data processed: for details, see the specific chapter of the Policy.

### **Does the controller perform automated decision-making, profiling?**

Neither automated decision-making, nor profiling is performed in relation to the data processing.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

**Processing of Employee data: processing of images, videos and audio recordings of Employees for marketing purposes**

The Data Controller declares that based on Section 11 of the Labour Code, the biometric data of an employee (co-worker) (such as photographs, audio recordings, digital impressions of the points on the folds of the fingertips, etc.) may be processed for the purpose of identifying the data subject if this is necessary to prevent unauthorised access to an object or data which may cause serious or massive and irreparable harm to

- (a) the life, physical integrity or health of the employee or others, or
- (b) a substantial interest protected by law.

A substantial protected interest is in particular

- (a) the protection of classified information of at least Confidential! classification level
- b) the custody of firearms, ammunition, or explosives,
- (c) the safeguarding of toxic or dangerous chemical or biological substances,
- (d) the safeguarding of nuclear material,
- (e) an interest in the protection of property of at least a particularly high value under the Criminal Code.

The Data Controller also emphasises that the images, video and/or audio recordings of its employees are not processed for identification purposes, but for the purposes of the Data Controller's marketing, and therefore the above rules do not apply to the processing of the data. The Data Controller does not process biometric data of Staff members for the purpose of identification of Staff members.

Summary table of the Data Controller's processing of images of employees for marketing purposes						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
the purpose specified in the data subject's consent	Voluntary consent	Employees	See details in the below privacy notice	Until erasure for the request of the Employee	electronically and/or on paper, manually	Data subjects

1. If it is not a mass recording, the Data Controller shall create audio, image and video recordings of the data subject in strict compliance with the provisions of the applicable Section 2:48 (1) of the Civil Code, for the purposes of the Data Controller's marketing and shall take only those steps (e.g. transmission, publication) to which the data subject has consented in the relevant declaration only with the data subject's prior consent.

**What is the legal basis for processing?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

2. Data processing may only take place with the explicit, voluntary consent of the data subject.

### **Who are the data subjects?**

3. Data subjects: any staff member who gives his or her prior consent to be photographed, video and/or audio recorded for the purposes of the Data Controller's marketing.

### **What are the scope and purposes of the data processed?**

4. Scope and purpose of the data processed:

data subject's voice recording	identification, marketing
data subject's portrait	identification, marketing
other images of the data subject, including video recordings, from which the data subject can be identified	identification, marketing
name	identification
other personal data on the consent form	identification

### **What is the purpose of the processing?**

5. The purpose of the processing is to make a recording. The independent purposes related to the main purpose, which the data subject specifies in his or her voluntary consent, may typically, but not exclusively, be the followings: publication of the recordings on the website or social networking site of the Controller, or otherwise making the recordings public for the purposes of the Controller's marketing.

### **How is the data processed?**

6. Typical activities and processes involved in data processing are as follows:
  - a. The Controller informs potential data subjects orally or in writing that a recording is being made. If the Data Controller is taking a mass recording, the consent of the data subject is not required. If a mass recording is not being made, but a recording is being made using a unique representation method, the Data Controller will require a consent form for the making and use of the recording.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- b. The Controller declares and the data subject acknowledges that the data subject may withdraw his or her prior consent at any time.
- c. The Data Controller will take the steps to which the data subject has given his or her consent in his or her declaration, e.g. transmission of recordings, disclosure.

### **How long does the processing last?**

- 7. Duration of the data processing: until erasure at the request of the data subject. The Controller must take steps to remove the data immediately upon receipt of the erasure request. The Data Controller will provide more information on the processing of data relating to data subjects upon request sent to [barnabas.bekesi@dhl.com](mailto:barnabas.bekesi@dhl.com). The deletion or blocking of data from the website and/or social networking site and/or from the data file can also be requested here.

### **How is the data processed?**

- 8. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

- 9. Data source: directly from the data subject

### **Do we disclose data to third parties?**

- 10. The Data Controller may transfer, transmit, share, or disclose the data produced in accordance with the data subject's voluntary consent, so that the data (such as images) will be available to third parties. The Data Controller may also engage a data processor to take pictures, in which case the Data Controller will inform the data subject accordingly.

### **How does the Data Controller ensure data security?**

- 11. Organisational and technical measures to protect the data processed: see in detail in the specific chapter of the Policy.

### **Does the controller perform automated decision-making, profiling?**

- 12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee data: management of data related to the recording of working time and rest periods**

Summary table on data management for the recording of working time and rest periods						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
to comply with legal obligations, record working time and rest periods	To fulfil a legal obligation	Employees	See details in the below privacy notice	Until a statutory time limit, the statute of limitation period under employment law or until a legitimate interest ceases to exist	Electronically, on paper, manually	Data subjects

1. The Data Controller keeps records of
  - a. the regular and irregular working hours,
  - b. on-call time,
  - c. holidays,
  - d. the duration of extraordinary working time performed based on an agreement pursuant to Section 109 (2) and Section 135 (3) of the Labour Code.

### **What is the legal basis for processing?**

2. Legal basis for data processing: fulfilment of a legal obligation based on Section 134 of the Labour Code.

### **Who are the data subjects?**

3. Data subjects: Employees.

### **What are the scope of the data processed?**

4. Scope of data processed  
See the data scope of the relevant register (1. a-d).

### **What is the purpose of the processing?**

5. The purpose of data processing is to comply with legal obligations, to record working and rest time.

### **How long does the processing last?**

6. Duration of the data processing:

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- a. until a statutory time limit, if such a time limit has been specified, or if there is no such limit,
- b. until the expiry of the general statute of limitation period under employment law (3 years) following the termination of the employment relationship.
- c. if the interest of the Data Controller requires so, until the legitimate interest ceases to exist. In this case, the Data Controller shall substantiate its legitimate interest by the means of legitimate interest test.

### **How is the data processed?**

7. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

8. Data source: directly from the data subject

### **Do we disclose data to third parties?**

9. Disclosure: data may be disclosed to a third party, to an external payroll processor, by informing the data subject. The details of the processor are set out in Annex II.

### **How does the Data Controller ensure data security?**

10. Organisational and technical measures for the protection of the data processed: see in detail in the specific chapter of the Policy.

### **Does the controller perform automated decision-making, profiling?**

11. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### **Other**

12. Regarding the data marked with \*, the Data Controller draws attention to the fact that if the data subject does not provide them to the Data Controller, the Data Controller refuses to provide the service (data processing).

Annex II:

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**



Data Controller: DHL Global Forwarding Hungary Ltd. (registered office: DHL Building (264), 1185 BUD International Airport, Budapest, Hungary, e-mail: [barnabas.bekesi@dhl.com](mailto:barnabas.bekesi@dhl.com), phone: +3629556000)

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Data Processors:

DHL Supply Chain Hungary Kft. payroll service provider (Cg. 13-09-084532; registered seat: Zöldmező út 2., 2225 Üllő, Hungary) and NEXON Kft. (Cg. 01-09-062647; registered seat: Váci út 185., 1138 Budapest, Hungary) - providers of the Data Controller's cafeteria and payroll data recording system.

Data may be transferred to authorities, courts if necessary.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee personal data: requesting an advance on wages**

Summary table of data processing related to the application for an advance on wages						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
payroll accounting	agreement	All staff who claim an advance on their wages	See in details on the declaration of advance payment of wages	See details in the below privacy notice	On paper, electronically, manually	Data subjects

1. The Data Controller shall register, authorise (or refuse) advances of wages of Employees.

### **What is the legal basis for processing?**

2. Legal basis for processing: agreement with the data subject.

### **Who are the data subjects?**

3. All staff who claim an advance on their wages.

### **What are the scope and purposes of the data processed?**

4. See in details the declaration of advance payment of wages.

### **What is the purpose of the processing?**

5. The purpose of the data management is the recording of advances on wages and salaries, payroll accounting.

### **How long does the processing last?**

6. Duration of the data processing: until the expiry of the statute of limitation period under employment law (3 years) following the termination of the legal relationship.

### **How is the data processed?**

7. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

8. Data source: directly from the data subject

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

### **Do we disclose data to third parties?**

9. Disclosure: data may be disclosed to a third party, an external payroll provider, by informing the data subject. The details of the data processor are set out in Annex II.

### **How does the Data Controller ensure data security?**

10. Organisational and technical measures for the protection of the data processed: see in detail in the specific chapter of the Policy.

### **Does the controller perform automated decision-making, profiling?**

11. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### **Other**

12. In relation to the data marked with \*, the Data Controller draws your attention to the fact that these data are the minimum necessary for identification and contact purposes.

Annex II:

Data Processors:

DHL Supply Chain Hungary Kft. payroll service provider (Cg. 13-09-084532; registered seat: Zöldmező út 2., 2225 Üllő, Hungary) and NEXON Kft. (Cg. 01-09-062647; registered seat: Váci út 185., 1138 Budapest, Hungary) - providers of the Data Controller's cafeteria and payroll data recording system.

Data may be transferred to authorities, courts if necessary.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee personal data: processing of data relating to payroll deduction**

*This includes the deduction of child support, other alimony, wages and allowances, etc. from the salary of the Employee.*

Summary table on payroll deduction data management						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Fulfilling a legal obligation	Fulfillment of legal obligations based on the Labour Code, Act of 1994, authority and court decisions	All employees whose salary is deducted (withheld) by the Data Controller	See details in the below privacy notice	For 5 years after the deduction	Electronically, automatically	From bailiff, authority, court

1. The Data Controller shall deduct from the salary of the Employee based on legislation (law or regulation) or an enforceable decision.

### **What is the legal basis for processing?**

2. To fulfil legal obligations, Labour Code, Act LIII of 1994, authority or court decision.

### **Who are the data subjects?**

3. Any Employee whose salary is deducted (withheld) by the Data Controller.

### **What are the scope and purposes of the data processed?**

4. See the details of the relevant decision.

### **What is the purpose of the processing?**

5. Fulfilling a legal obligation, taking a deduction for a reason (e.g. payment of child support, etc.).

### **How is the data processed?**

6. The activity and process concerned by the processing are as follows:
  - a. The Data Controller is obliged to notify the debtor of the deduction, and to arrange for the deduction on the day of payment of the wages (when the wages are due) as well as its payment to the enforcer.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- b. If there is an obstacle to the deduction, the Controller shall notify the authority or body that issued the decision thereof. If it has not been possible to deduct any part or all of the amount due from the wages of the debtor Employee in periodic instalments during a month, the outstanding instalments shall be deducted as soon as possible. This shall also apply to the instalments due during the period of employment with the previous employer and during the period of non-employment.

#### **How long does the processing last?**

7. Duration of the data processing: 5 years after the deduction.

#### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

#### **Where did the data come from?**

9. Source of data: from bailiffs, authorities, courts.

#### **Do we disclose data to third parties?**

10. Disclosure: to bailiffs, authorities, courts.

#### **How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed: see the introductory text of the privacy notices.

#### **Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee data: notification/declaration of second job**

Notification/declaration of second job – summary table on data processing						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
To comply with legal requirements	To fulfil a legal obligation	Employees	See details in the below privacy notice	For 5 years after the Employee has reached the age of retirement.	Electronically, on paper, manually	Data subjects

1. The Data Controller formalises the registration of additional employment relationships .

### **What is the legal basis for processing?**

2. Legal basis for processing: performance of a legal obligation.

### **Who are the data subjects?**

3. Data subjects: Employees who declare their second job to the Data Controller.

### **What are the scope and purposes of the data processed?**

4. See the data content of the notification form/declaration.

### **What is the purpose of the processing?**

5. The purpose of data processing is to comply with legal requirements.

### **How long does the processing last?**

6. Duration of the data processing: until the end of 5 years after the Employee has reached retirement age.

### **How is the data processed?**

7. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

8. Data source: directly from the data subject

### **Do we disclose data to third parties?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

9. Disclosure: only used for the purposes of official police business or authority procedures.

**How does the Data Controller ensure data security?**

10. Organisational and technical measures to protect the data processed: see in detail in the specific chapter of the Policy.

**Does the controller perform automated decision-making, profiling?**

11. Neither automated decision-making, nor profiling is performed in relation to the data processing.

**Other**

12. In relation to the data marked with \*, the Data Controller draws your attention to the fact that these data are the minimum necessary for identification and contact purposes.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

**Processing of Employee data: management of data related to performance evaluation**

*This includes any performance assessment carried out by the Data Controller.*

Summary table of data processing related to performance evaluation						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
the purpose of performance evaluation, to provide the Employee and the Data Controller with measurable feedback on the tasks performed	Legitimate interest of the Data Controller	Employees	See details in the below privacy notice	Statute of limitation period under employment law (3 years)	Electronically, on paper, manually	Data subjects

13. The Data Controller shall conduct staff performance appraisals on a regular basis.

**What is the legal basis for processing?**

14. Legal basis for processing: legitimate interest of the Data Controller. The Data Controller's legitimate interest is to monitor the performance and development of the Staff, to assist and develop the Staff.

**Who are the data subjects?**

15. Data subjects: Employees

**What are the scope and purposes of the data processed?**

16. Scope and purpose of the data processed:

Name of Employee*	identification
KPI data*	evaluation
Name of the evaluator*	identification
Evaluation result *	tracking, payroll

**What is the purpose of the processing?**

17. The purpose of the processing is to perform an evaluation, to provide the Employee and the Data Controller with measurable feedback on the tasks performed by the Employee.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**



### **How is the data processed?**

18. The activities and processes involved in the processing are typically, but not exclusively as follows:

- a. The Employee concerned and his or her supervisor carrying out the evaluation shall periodically evaluate the Employee's activities by completing questionnaires designed for this purpose.
- b. The completed questionnaires will be sent to the responsible HR Staff member in charge in order to ensure a smooth payroll (e.g. bonus).
- c. No one else has the right to or access to the results of the performance appraisal unless the Employee has expressly agreed to the access.

### **How long does the processing last?**

19. Duration of the data processing: statute of limitation period under employment law (3 years).

### **How is the data processed?**

20. Data processing methods: electronically and on paper, manually. A The results are generated by the Employees without automated decision-making, autonomously, manually.

### **Where did the data come from?**

21. Data source: directly from the data subject

### **Do we disclose data to third parties?**

22. Disclosure:

Participants involved in joint data management in the context of the MyTalentWorld e-learning and objectives registration system:

Deutsche Post AG  
53250 Bonn

contact details of the Data Protection Officer:

Gabriela Krader, LL.M

<https://www.dhl.com/hu-hu/home/elolab/helyi-adatvedelmi-nyilatkozat/kapcsolatfelvetel-adatvedelmi-kerdesekben.html>

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

### **How does the Data Controller ensure data security?**

23. Organisational and technical measures to protect the data processed: for details, see the specific chapter of the Policy.

### **Does the controller perform automated decision-making, profiling?**

24. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### **Other**

25. In relation to the data marked with \*, the Data Controller draws your attention to the fact that these data are the minimum necessary for identification and contact purposes.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee data: data processing in connection with an emergency plan**

Summary table of data processing in the context of the emergency plan						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Notification of the person designated by the Employee (data subject) in connection with an emergency involving the Employee	Vital interest of the Employee	Natural persons who can be identified by the personal data provided by the Employee; the Employee	See details in the below privacy notice	For the duration of the employment.	Electronically, on paper, manually	Data subjects

1. The Data Controller shall process the data of the Employees and of those whom the Employee concerned (as data controller) provides to the Data Controller so that the Data Controller can notify them in case of an emergency.

### **What is the legal basis for processing?**

2. The processing is carried out to protect the vital interests of the Employee.

### **Who are the data subjects?**

3. Employees and natural persons identifiable by the personal data provided by Employees.

### **What are the scope and purposes of the data processed?**

4. The scope and purposes of the data processed are as follows:  
 Data of the Employee (see the information/description in relation to the staff register) and the following data provided by the Employee:
 

name	identification, addressing
phone number	for contact purposes
address	for contact purposes

### **What is the purpose of the processing?**

5. Notification of the person designated by the Employee (data subject) in connection with an emergency situation involving the Employee.

### **How is the data processed?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

6. The activity and process concerned by the processing are as follows:
- a. The Employee provides the above information in writing of the person or persons whom the Data Controller is entitled and obliged to notify in the event of an emergency. The Employee shall become the data controller in this relationship and shall be obliged to obtain the consent of these third parties for the processing of their data, to use another legal basis and to inform them of the processing by the Controller.
  - b. The Controller shall store the data in a secure manner and in a secure location. The Controller shall only use it in case of an emergency.
  - c. The Data Controller shall comply with the obligation to notify only the person(s) identified by the Employee of the emergency.

**How long does the processing last?**

7. Duration of the data processing: for the duration of the employment.

**How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

**Where did the data come from?**

9. Data source: directly from the data subject

**Do we disclose data to third parties?**

10. Disclosure: the data will not be disclosed to third parties.

**How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed: see separate chapter.

**Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee personal data: data processing in relation to workwear**

Workwear-related data management summary table						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Provision of suitable working conditions, reimbursement of the employee's employment-related expenses (if they buy the workwear for themselves).	Based on agreement	All Employees in relation to whom the Data Controller processes workwear data	See details in the below privacy notice	Wearing time of the workwear	Electronically, automatically	Data subjects

1. The Data Controller provides (has provided) work clothing for its employees with specific work responsibilities. If the workwear is ordered/purchased by the Data Controller, the Data Controller shall manage the Employee's sizes.

### **What is the legal basis for processing?**

2. The processing is based on an agreement. (In case of protective equipment, to fulfil a legal obligation.)

### **Who are the data subjects?**

3. All Employees in relation to whom the Data Controller processes workwear data.

### **What are the scope and purposes of the data processed?**

4. See the data fields of the workwear register.

### **What is the purpose of the processing?**

5. Provision of suitable working conditions, reimbursement of the employee's employment-related expenses ((if they buy the workwear for themselves).

### **How is the data processed?**

6. The activity and process concerned by the processing are as follows:  
a. The Data Controller determines the job functions for which the Employee is required to wear workwear.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- b. The Data Controller shall record the sizes of the Employees concerned, order and deliver the workwear, arrange for the washing of the workwear, etc.

#### **How long does the processing last?**

7. Duration of the data processing: during the wearing time of the workwear.

#### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

#### **Where did the data come from?**

9. Data source: directly from the data subject.

#### **Do we disclose data to third parties?**

10. Disclosure: to the Partner performing the cleaning of the workwear.

#### **How does the Data Controller ensure data security?**

11. Organizational and technical measures to protect the data processed: see the introductory text of the privacy notices.

#### **Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

#### **Other**

13. The above data processing shall apply mutatis mutandis to protective equipment when it is required in connection with a job.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee data: processing of health-related data**

*This includes for example the processing of pregnancy, health records, etc.*

Summary table on processing of health-related data						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
To fulfil a specific purpose of which the data subject has been informed in advance.	Voluntary consent or performance of a legal obligation	Any Employee who shares health data with the Data Controller	See details in the below privacy notice	See details in the below privacy notice	Electronically, on paper, manually	Data subjects

1. If the data subject provides the Data Controller with data relating to the health of the Employee concerned, the data shall be processed in accordance with this Privacy Notice.

### **What is the legal basis for processing?**

2. Legal basis of the processing:
  - a. the transfer of health-related data is typically based on voluntary, explicit consent
  - b. the provision of health data to the Data Controller may be mandatory, a prerequisite for employment, or for the purpose of providing evidence to a public authority

### **Who are the data subjects?**

3. Data subjects: all Employees who share health data with the Data Controller.

### **What are the scope and purposes of the data processed?**

4. Scope and purpose of the data processed:

name	identification, addressing
address	identification
health data	a specific purpose of which the data subject has been informed in advance

### **What is the purpose of the processing?**

5. A specific purpose of which the data subject has been informed in advance.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

### **How is the data processed?**

6. The activities and processes involved in the processing are typically, but not exclusively as follows:
  - a. The data subject shares health data with the Data Controller.
  - b. Health data is stored by the Data Controller on paper or in an electronic record system specifically used for this purpose.
  - c. The Data Controller will only collect health data that is necessary for the service in question.
  - d. The data subject shall have the right to be informed of the processing, to obtain access to his/her health and personal data, to have access to and obtain copies of the medical records.
  - e. Health data may be transferred only if the data subject has given his or her explicit, voluntary, and written consent to the transfer with the knowledge of the recipient of the transfer, or in the event of a danger to his or her life, or if the transfer of health and personal data is required by law.

*The Employee's medical record book (egészségügyi kiskönyv) is kept in the Data Controller's unit for evidentiary purposes.*

### **How long does the processing last?**

7. Duration of the data processing:
  - a. if it concerns the length of employment relationship or earnings, for 5 years after the end of the applicable retirement age of the Employee
  - b. if the length of employment relationship or earnings is not affected, but the has a labour-law relevance, then the statute of limitation period under employment law, or
  - c. during the statute of limitation period under civil law; or
  - d. within the time limits laid down by law.

### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

9. Data source: directly from the data subject

### **Do we disclose data to third parties?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**



10. Disclosure: where disclosed, the recipients are listed in Annex II.

### **How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed:

- a. Access to the health data of the data subject shall be limited to the Staff member with whom the data subject has shared the data, to the Staff member who is providing the service to the data subject, who needs to know the health data for the provision of the service, and to whom accessing the data the data subject has given his/her voluntary consent.
- b. The processing of health data is carried out with special care and security measures by the Staff.
- c. For other matters, see separate privacy notice.

### **Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

Annex II:

Data Processors:

DHL Supply Chain Hungary Kft. payroll service provider (Cg. 13-09-084532; registered seat: Zöldmező út 2., 2225 Üllő, Hungary) and NEXON Kft. (Cg. 01-09-062647; registered seat: Váci út 185., 1138 Budapest, Hungary) - providers of the Data Controller's cafeteria and payroll data recording system.

Data may be transferred to authorities, courts if necessary.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee data: data processing related to funeral allowance**

Summary table on data processing in relation to funeral allowance						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
The provision of funeral allowance	Voluntary consent	All Staff members and relatives of former Staff members who apply to the Data Controller for funeral allowance	See details in the below privacy notice	within the statute of limitation period of 5 years	Electronically, on paper, manually	Data subjects

1. In the event of the death of a relative of a Staff member or a pensioner, i.e. a former Staff member, the Staff member or the pensioner relative of the deceased will receive a funeral allowance from the Data Controller. The definition of a relative is contained in the Civil Code in force.

### **What is the legal basis for processing?**

2. Legal basis for processing: voluntary consent (application).

### **Who are the data subjects?**

3. Data subjects: all Staff members and relatives of former Staff members who apply for funeral allowance from the Data Controller. The Data Controller also processes the data of the deceased.

### **What are the scope and purposes of the data processed?**

4. The scope and purpose of the data processed in relation to the application:

name of applicant*	identification
address of applicant	identification, for contact purposes
account number of applicant	payment
name of Employee*	identification
Employee's birthplace and date	identification
phone number	for contact purposes
application	processing of application
death certificate	basis of claim
invoice	basis of claim
evidence on next of	

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

kin's status	for subsequent administrative enquiry / for evidentiary purposes
amount of allowance	assessment, payment, for future evidentiary purposes

### **What is the purpose of the processing?**

5. The purpose of the processing is to provide funeral allowance.

### **How is the data processed?**

6. The activities and processes involved in the processing are typically, but not exclusively as follows:
- A data subject submits a request to the Data Controller.
  - A data subject submits a death certificate to the Data Controller.
  - If necessary for subsequent investigations by public authorities (e.g. tax authorities), the Data Controller shall store the identification data from the birth certificate and, if required by law, make a copy thereof.
  - In case of evidentiary procedure, the Data Controller shall establish the amount of the funeral allowance and pay it to the person concerned.

### **How long does the processing last?**

7. Duration of the data processing: 5 years after receiving the allowance (statute of limitation period as the potential period of investigation by the tax authorities).

### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

9. Data source: directly from the data subject

### **Do we disclose data to third parties?**

10. Disclosure of data: none.

### **How does the Data Controller ensure data security?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

11. Organisational and technical measures to protect the data processed:  
see separate chapter.

**Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

**Other**

13. Regarding the data marked with \*, the Data Controller draws attention to the fact that if the data subject does not provide them to the Data Controller, the Data Controller refuses to provide the service (data processing).

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing Employee data: Data processing in relation to study contracts**

Summary table on data processing in relation to study contracts						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Training of a staff member	Article 6 (1) (b) of the GDPR, the agreement between the data subject and the Controller. The agreement is governed by the Labour Code.	Any natural person who enters a study contract with the Data Controller is in practice an Employee in an employment relationship with the Data Controller.	See details in the below privacy notice	Statute of limitations under employment law (3 years)	Electronically, on paper, manually	Data subjects

1. In the study contract, the Data Controller as the employer undertakes to provide support to the Employee during the training chosen by the Employee, but of course approved by the Data Controller.

### **What is the legal basis for processing?**

2. The legal basis for the processing is Article 6 (1) (b) of the GDPR, the agreement between the data subject and the Data Controller. The agreement is governed by the Labour Code.

### **Who are the data subjects?**

3. Any natural person who concludes a study contract with the Data Controller is in practice an Employee in an employment relationship with the Data Controller.

### **What are the scope and purposes of the data processed?**

4. See the details of the study contract.

### **What is the purpose of the processing?**

5. Training of the employee.

### **How is the data processed?**

6. The activity and process concerned by the processing are as follows:
  - a. Employee (Co-worker) chooses a training appropriate to the tasks he/she performs or will perform in the future.
  - b. Employer (Data Controller) approves the training chosen.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

c. The Employee and the Data Controller conclude an agreement.

### **How long does the processing last?**

7. Duration of the data processing: statute of limitation period in employment law (3 years).

### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

9. Data source: directly from the data subject

### **Do we disclose data to third parties?**

10. Disclosure of data: to external parties providing payroll and accounting services (Annex II), and to public authorities and courts in the event of an official request.

### **How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed: see separate chapter.

### **Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

Annex II:

Data Processors:

DHL Supply Chain Hungary Kft. payroll service provider (Cg. 13-09-084532; registered seat: Zöldmező út 2., 2225 Üllő, Hungary) and NEXON Kft. (Cg. 01-09-062647; registered seat: Váci út 185., 1138 Budapest, Hungary) - providers of the Data Controller's cafeteria and payroll data recording system.

Data may be transferred to authorities, courts if necessary.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Processing of Employee data: data processing related to travel expenses**

Summary table of data processing in relation to travel expenses						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Provision of travel reimbursement subject to legal requirements	See details in the below privacy notice	Any natural person who receives a travel allowance from the Data Controller	See details in the below privacy notice	Statute of limitation period under tax law	Electronically, on paper, manually	Data subjects

1. Based on the provisions of the Labour Code, the Data Controller, as the employer, undertakes, inter alia, to reimburse those expenses of the Employee which are reasonably incurred in connection with the performance of the employment relationship. The Employee must be able to travel regularly from his/her place of residence to his/her place of work to fulfil the employment obligation.

### **What is the legal basis for processing?**

2. Agreement (Article 6 (1)(b) of GDPR) or fulfilment of a legal obligation under the Labour Code. The detailed rules on travel expenses are laid down in Government Decree 39/2010 (26.III.2010) and the tax implications are laid down in Act CXVII of 1995.

### **Who are the data subjects?**

3. All natural persons who receive a travel allowance from the Data Controller.

### **What are the scope and purposes of the data processed?**

4. Scope and purposes of the data processed:

name*	for contact purposes, addressing
place and date of birth*	identification
mother's name*	identification
place of residence or stay,	
place of work*	for cost accounting
period*	for cost accounting

### **What is the purpose of the processing?**

5. Providing travel reimbursement subject to legal requirements.

### **How is the data processed?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

6. The activity and process concerned by the processing are as follows:

- a. The Employee concerned declares the details of his/her commute to work.
- b. The Data Controller establishes and pays the amount to which the data subject is entitled to under the applicable legal regulation.

**How long does the processing last?**

7. Duration of the data processing: within the statute limitation period under tax law (tax year plus 5 years).

**How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

**Where did the data come from?**

9. Data source: directly from the data subject

**Do we disclose data to third parties?**

10. Disclosure: the data will not be disclosed to third parties.

**How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed: see separate chapter.

**Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

**Other**

13. Data marked with \* are necessary for the data processing.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**



## **Processing of Employee data: data processing related to exit interviews**

The Data Controller will ask departing Staff members about the reasons for leaving, so that it can take appropriate steps to reduce the reasons for Staff members leaving in the future.

Summary table on data processing related to exit interviews						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Taking appropriate actions on the basis of the responses so that the same reasons do not lead another staff member to leave employer	voluntary consent	All exiting Employees who agree to an exit interview	See details in the exit interview questionnaire, but typically: name, date of entry and exit, answers	until the objective is achieved, until the responses are processed, or earlier if the person concerned has withdrawn his/her consent	Electronically, on paper, manually	Data subjects

### **What is the legal basis for processing?**

1. Legal basis for processing: the data subject's voluntary consent, given that this processing is not related to the exercise of the Data Controller's right as an employer.

### **Who are the data subjects?**

2. Data subjects: all departing Employees who consent to an exit interview.

### **What are the scope and purposes of the data processed?**

3. The scope and purposes of the data processed are set out in the exit interview questionnaire, but typically include:

name	identification
date of entry and exit	identification
answers to the questionnaire	steps based on answers

### **What is the purpose of the processing?**

4. Purpose of data processing: to take appropriate action based on the responses, so that the same reasons do not lead another employee to leave the employer.

### **How is the data processed?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

5. The activities and processes involved in the processing are typically, but not exclusively as follows:
- a. The Data Controller asks the data subject whether he/she wishes to participate in the exit interview and whether he/she consents to the processing of his/her personal data.
  - b. If the data subject wishes to participate in an identifiable way, the Controller will record his/her personal data. If the data subject wishes to participate in a non-identifiable way, the Controller will not record any personal data.
  - c. The documents will be stored by the Data Controller either in the data subject's files or in a different location (if he or she has not consented to the identifiable processing).

#### **How long does the processing last?**

6. Duration of the data processing:
- a. until the purpose is achieved, until the responses are processed, or earlier
  - b. if the data subject has withdrawn his or her consent.

#### **How is the data processed?**

7. Data processing methods: electronically and on paper, manually.

#### **Where did the data come from?**

8. Data source: directly from the data subject

#### **Do we disclose data to third parties?**

9. Disclosure of data: none.

#### **How does the Data Controller ensure data security?**

10. Organisational and technical measures to protect the data processed: see the introductory text of the privacy notices.

#### **Does the controller perform automated decision-making, profiling?**

11. Neither automated decision-making, nor profiling is performed in relation to the data processing.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## Other

12. The Data Controller may process the responses provided in an anonymised manner, not linked to the data subject, for statistical purposes (also without the consent of the Employee).

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

**Processing of Employee personal data: data processing in connection with the termination of an employment relationship**

Summary table on the data processing related to the termination of an employment relationship						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
To fulfil a legal obligation	To fulfil a legal obligation (GDPR Article 6(1)(c)) under social security and tax law	All Employees who are leaving the employer / whose employment is terminated	See data content of documents provided to the leaving Employee	Data on earnings and length of employment relationship are retained by the Data Controller for 5 years after the employee reaches the applicable retirement age, on the basis of a legal obligation	On paper, electronically	data subjects, for some documents by public authorities or courts

1. In the event of termination of the Employee's employment, the Data Controller shall prepare and provide the Employee with documents specified by law (data processing).

**What is the legal basis for processing?**

2. Legal basis for processing: fulfilment of a legal obligation (GDPR Article 6(1)(c)) under social security and tax law.

**Who are the data subjects?**

3. Data subjects: all Employees who are leaving / whose employment is terminated.

**What are the scope and purposes of the data processed?**

4. For the scope of the data processed, see the documents listed below:

- Employer's certificate on termination of employment
- Information sheet on income from employer (partnership), tax and tax deduction upon the termination of employment (membership)
- Certificate of contributions deducted and paid in the year under review (Section 47 (3) of Social Security Act)
- Information sheet on maintenance of obligations determined based on a court order
- Supporting documents for job-seeker's allowance

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- Social insurance record book

Typically, but not exclusively, the following data are processed:

- personal data of the worker (name, name at birth, mother's name, place of birth, year, month, day),
- employee's social security number,
- tax identification number,
- length of employment relationship with the employer,
- the amount of the debt to be deducted from the employee's wages based on a final decision or legal regulation, or the entitlement to such a deduction,
- the number of days of sick leave taken by the Employee in the year of termination of employment, if the Employee has received increased severance pay under the provisions on the applicable law

### **What is the purpose of the processing?**

5. Purpose of processing: to comply with a legal obligation.

### **How is the data processed?**

6. The activities and processes involved in the processing are typically, but not exclusively as follows:
  - a. In the event of the departure of a staff member, the Controller shall prepare the above-mentioned documents and hand them over to the staff member concerned in such a way that the handover can be proved later.
  - b. The Data Controller shall keep and store a copy of the documents issued for the period specified for the data processing activity.

### **How long does the processing last?**

7. Duration of the data processing: data on earnings and length of employment relationship are retained by the Data Controller for 5 years after the employee reaches the applicable retirement age, based on the legal obligation.

### **How is the data processed?**

8. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

9. Source of data: directly from the data subject, for some documents by public authorities or courts (e.g. in relation to a debt to be deducted from the employee's wages based on a final decision or legal regulation).

#### **Do we disclose data to third parties?**

10. Disclosure of data: to the tax authorities for the purpose of the termination of the employment relationship, otherwise no data is disclosed, except in response to official requests from public authorities or courts.

#### **How does the Data Controller ensure data security?**

11. Organisational and technical measures to protect the data processed: see the introductory text of the privacy notices.

#### **Does the controller perform automated decision-making, profiling?**

12. Neither automated decision-making, nor profiling is performed in relation to the data processing.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## **Data processing in relation to the record of an accident at work**

Summary table on data processing in relation to the record of an accident at work						
Purpose	Legal basis	Data subjects	Data category	Duration	Method	Data source
Identifying and contacting those affected, taking legal and other action in relation to the accident	To fulfil a legal obligation, legitimate interest of the data subject and the Data Controller, vital interest of the data subject	Any Employee who has suffered an accident, whistle-blower, witness, person who caused the accident, anyone whose rights, interests or freedoms are affected by the accident	See details in the below privacy notice	5 years after the investigation has been completed	electronically and/or on paper, manually	Data subjects, third parties

1. In the unintended event that a data subject is involved in an accident while commuting or working, the Data Controller - with the assistance of the data subject where possible – keeps record of the accident, creates a claim form for the insurance company, and transfers the personal and other specific data to the competent healthcare provider.

### **What is the legal basis for processing?**

2. The legal basis for the processing is the fulfilment of a legal obligation, the legitimate interest of the data subject and the Data Controller, or the vital interest of the data subject (in particular if the accident occurred abroad and the care is provided by a foreign healthcare provider).

### **Who are the data subjects?**

3. Data subjects: any Employee who has suffered an accident, whistle-blower, witness, person who caused the accident, anyone whose rights, interests or freedoms are affected by the accident.

### **What are the scope and purposes of the data processed?**

4. The scope of the data processed in connection with the accident report:

name of the injured person concerned *	mandatory data required to complete the accident report
name at birth*	mandatory data required to complete the accident report
place of birth *	mandatory data required to complete the accident report

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

date of birth *	mandatory data required to complete the accident report
mother's name*	mandatory data required to complete the accident report
permanent address *	mandatory data required to complete the accident report
phone number*	mandatory data required to complete the accident report
date of accident*	mandatory data required to complete the accident report
place of accident *	mandatory data required to complete the accident report
brief description of the accident *	mandatory data required to complete the accident report
the state of health of the person concerned	mandatory data required to complete the accident report
name of witness	mandatory data required to complete the accident report
phone number of witness	mandatory data required to complete the accident report
address of witness	mandatory data required to complete the accident report
short witness statement	data required to complete the accident report
name of the person involved in the accident, if any	data required to complete the accident report
address and phone number of the person involved in the accident, if any	data required to complete the accident report
if the person involved in the accident has received first aid, a statement from the person who provided the first aid	
if an ambulance is required, name of the caller concerned, time of call	

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**



5. Claim form sent to the insurance company:  
See the claim form details provided by the insurance company.

### **What is the purpose of the processing?**

6. The purpose of the processing is to identify the data subjects, to contact them and to take legal and other action in relation to the accident.

### **How is the data processed?**

7. The activities and processes involved in the processing are typically, but not exclusively as follows:
- a. Immediately after becoming aware of the accident, the Data Controller shall create an accident report with the active cooperation of the affected Employee, witness(es) involved, the data subject who caused the accident (if any), by recording the data as specified above.
  - b. The Data Controller shall name the insurance company to the data subject. The Data Controller shall create and complete a claim form and send it to the insurance company.
  - c. The Data Controller also informs other recipients of the data transfer (see below).
  - d. The Data Controller will make a copy of both the accident report and the claim form, which will be stored for future reference in accordance with the Record Management Policy.
  - e. The Data Controller shall contact the data subject who has suffered the accident and, where necessary, the witnesses and the data subject(s) who caused the accident and inform them about the facts and about the legal and other steps to be taken.

### **Do we disclose data to third parties?**

8. The Data Controller may transfer the data available
- a. to public authorities (e.g. police),
  - b. to a court,
  - c. to an insurance company previously named to the data subject,
  - d. to the safety and health representative (data processor), in which case the data processor's details are set out in Annex II.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

9. The Data Controller shall also transmit the accident report of the Employee's accident and thus its data content:

- a. to the injured person or, in case of death, to his/her next of kin;
- b. to the competent labour inspectorate of the place where the accident occurred.
- c. in the case of posting abroad, foreign service, temporary employment, to the competent labour inspectorate of the place of establishment of the employer (in the case of an accident at work of a Hungarian Employee of an employer established in Hungary);
- d. to the National Health Insurance Fund of Hungary, the social insurance payment office or in case it's not possible, to the competent health insurance administration body;
- e. in the case of temporary work or secondment, to the employer providing or seconding the workers.

10. When the report is sent to the labour inspectorate, a copy of the complete documentation of the employer's accident investigation must be enclosed, in particular:

- a. the records of the interviews
- b. the document certifying professional qualifications
- c. a document certifying the entitlement to treatment
- d. documentary evidence of medical fitness
- e. a document documenting the placing in service
- f. a document documenting the periodic safety review
- g. a document documenting the risk assessment
- h. photographic records, video records, if any
- i. relevant parts of the internal rules and regulations

11. The legal basis for the data transfers is a legal obligation or, if this is not applicable, the legitimate interest of the Data Controller.

### **How long does the processing last?**

12. Duration of processing: 5 years from the end of the investigation.

### **How is the data processed?**

13. Data processing methods: electronically and on paper, manually.

### **Where did the data come from?**

14. Data source: directly from the data subject

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

### **How does the Data Controller ensure data security?**

15. Organisational and technical measures to protect the data processed: see separate chapter.

### **Does the controller perform automated decision-making, profiling?**

16. Neither automated decision-making, nor profiling is performed in relation to the data processing.

### **Other**

17. Regarding the data marked with \*, the Data Controller draws your attention to the fact that the transfer of the data is a legal obligation.

Annex II:

Data Processors:

Data may be transferred to authorities, courts if necessary.

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

## DETAILED EXPLANATION OF DATA SUBJECTS' RIGHTS AND DATA SECURITY MEASURES

**DHL Global Forwarding Hungary Ltd.** (registered office: DHL Building (264), 1185 BUD International Airport, Budapest, Hungary; company registration number: 01-09-178634, tax number: 10414741-2-44; represented by: Zoltán Rezsek managing director, phone: +36(29)556000; name and contact details of the Data Protection Officer: Barnabás Békési, [barnabas.bekesi@dhl.com](mailto:barnabas.bekesi@dhl.com), +36 (30) 382 3586), as Data Controller, hereby informs the data subjects about the data security measures implemented by the Data Controller in connection with the above data processing activities (detailed in the Privacy Notice on HR-related Data Processing Activities) and the rights of the data subjects.

### How does the Data Controller ensure data security?

Data Controller shall particularly ensure in the context of its IT security responsibilities the followings:

- a. denying unauthorised persons' access to the systems used for data processing (hereinafter referred to as the "data management system"),
- b. preventing the unauthorised reading, copying, modification or removal of data carriers,
- c. preventing any unauthorised input of personal data into the data management system and the unauthorised access to, modification or deletion of personal data stored in the data management system,
- d. preventing the use of the data management systems by unauthorised persons by means of data transmission equipment,
- e. ensuring that persons authorised to use the data management system have access only to the personal data specified in their access authorisation,
- f. ensuring that it is possible to verify and establish to which recipients the personal data have been or may have been transmitted or made available by means of a data transmission installation,
- g. ensuring that it is possible to verify and establish a posteriori which personal data have been put into the data management system, at what time and by whom,
- h. the prevention of unauthorised access to, copying, modification or deletion of personal data during their transmission or during the transport of the data carrier / storage medium,
- i. ensuring that the data management system can be restored in the event of a malfunction,

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

- j. that the data management system is operational, that any errors in its operation are reported and that the personal data stored there cannot be altered by the system's malfunctioning.

### What rights do data subjects have?

The following table shows the relationship between the data subject's rights and the legal basis of the processing, so that it is clear to the data subject what rights he or she can exercise under the legal basis used.

	Right to Information	Right of Access	Right to Rectification	Right to Erasure	Right to Restriction of Processing	Right to Data Portability	Right to Object	Right to Withdraw Consent
Consent	✓	✓	✓	✓	✓	✓	✗	✓
Agreement	✓	✓	✓	✓	✓	✓	✗	✗
Legal obligation	✓	✓	✓	✗	✓	✗	✗	✗
Vital interest	✓	✓	✓	✓	✓	✗	✗	✗
Public task, public authority law	✓	✓	✓	✗	✓	✗	✓	✗
Legitimate interest	✓	✓	✓	✓	✓	✗	✓	✗

#### Right to Information (Article 15 GDPR)

The data subject has the right to receive feedback from the Data Controller on whether his or her personal data are being processed. If such processing is in progress, the data subject shall have the right to obtain access to the personal data and information about the circumstances of the processing. Where personal data are transferred to a third country or an international organisation, the data subject is entitled to be informed of the appropriate safeguards for the transfer in accordance with Article 46 GDPR. For the data subject's request the Controller shall provide the data subject with a copy of the personal data which are the subject of the processing.

#### Right to Withdraw Consent (Article 7 GDPR)

The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

#### Right to Rectification (Article 16 GDPR)

The data subject shall have the right to obtain, at his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her.

#### Right to Object (Article 21 GDPR)

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

The data subject has the right to object at any time, on grounds relating to his or her situation, to the processing of his or her personal data based on Article 6(1)(e) or (f) of the GDPR.

In this case, the Data Controller may no longer process the personal data, unless it can demonstrate that the processing is justified on legitimate grounds which override the interests, rights, and freedoms of the data subject.

### **Right to Restriction of Processing (Article 18 GDPR)**

The data subject shall have the right to obtain, at his or her request, the restriction of processing by the Data Controller if any of the conditions set out in the GDPR are met. In this case the Data Controller shall not perform any operation on the data other than storage.

If the data subject has objected to the processing: in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Data Controller prevail over the legitimate grounds of the data subject.

### **Right to Erasure (to Be Forgotten) (Article 17 GDPR)**

The data subject shall have the right to obtain from the Data Controller the erasure of personal data relating to him or her without undue delay where the processing has no purpose, consent has been withdrawn and there is no other legal basis, there is no overriding legitimate ground for processing in the event of an objection, the data have been unlawfully processed, or the data must be erased in order to comply with a legal obligation. Where the Data Controller has disclosed the personal data and is under an obligation to erase it, it shall take reasonable steps, including technical measures, considering the available technology and the cost of implementation, to inform the controllers that process the data that the data subject has requested the deletion of the links to, copies or replicas of the personal data in question.

### **Right to Data Portability (Article 20 GDPR)**

The data subject is entitled to receive the personal data concerning him or her which he or she has provided to the Controller in a structured, commonly used, machine-readable format and to transmit these data to another controller without hindrance from the Data Controller to which he or she has provided the personal data, if legal conditions (automated processing and consent or agreement being the legal basis of the processing) are met.

### **Where and how can data subjects request detailed information on the processing and transfer of their data? Where and how can data subjects exercise their rights?**

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**

Data Controller: DHL Global Forwarding Hungary Ltd. (registered office: DHL Building (264), 1185 BUD International Airport, Budapest, Hungary, e-mail: [barnabas.bekesi@dhl.com](mailto:barnabas.bekesi@dhl.com), phone: +3629556000)

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The Data Controller draws the attention of the data subjects to the fact that they may request information, exercise their right of access and other rights by sending a statement to the Data Controller's postal or e-mail contact details. The Data Controller will examine and reply to the statement as soon as possible after receipt and will take the necessary steps in accordance with this privacy policy, the Data Controller's Internal Privacy Policy, and the law.

**How to contact the authority in the event of a complaint (Article 77 GDPR):**

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Address: Falk Miksa street 9-11, 1055 Budapest, Hungary; Mailing address: P.O. Box 9, 1363 Budapest, Hungary; Phone: +36 (1) 391-1400; Fax: +36 (1) 391-1410; Website: [www.naih.hu](http://www.naih.hu); E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

For more information about your rights and details of how to complain to the authority, please visit:

<http://naih.hu/panaszuegyintezes-rendje.html>.

In the event of a breach of the data subject's rights, the data subject may also bring the matter before the competent court in his or her place of residence and claim, among other things, damages. You can find the court of your place of residence here:

<https://birosag.hu/birosag-kereso>

The data subject may exercise his or her rights (right of access, rectification, erasure, right to be forgotten, restriction, objection, data portability, right to withdraw consent) by sending a request to the contact details of the Data Controller and by lodging a complaint with the public authority ([www.naih.hu](http://www.naih.hu)). If the data subject considers his or her rights being infringed, he or she may also bring the matter before the court competent in his or her place of residence. **For a detailed explanation of the data subject's rights and the data security measures applied by the Data Controller, see the end of this privacy notice.**