

Information note on data management

Dear Employee,

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

1. The identity of the data controller

On behalf of Pannon-Work, as the Lender

The data controller of the personal data of our temporary agency workers is primarily the member of the Pannon-Work group of companies with which the temporary agency worker has entered into an employment relationship. This can be Pannon-Work Zrt. (H-1114 Budapest, Bartók Béla út 15/D. II/ 18.), Gamax Kft. (registered office: H-1114 Budapest, Bartók Béla út 15/d. II/18.), Pannon-Work Consulting Kft. (H-1114 Budapest, Bartók Béla út 15. D. ép. II/18.), Munka Mindenkinek Szociális Szövetkezet ('Work for All Social Cooperative'; H-9165 Cakóháza Fő u. 41.), MELÓ-CLUB Munkaszervező Szociális Szövetkezet ('MELÓ-CLUB Work Organizing Social Cooperative'; H-2161 Csomád, Akácos utca 15.), Telekontakt Marketing Kft. (H-9165 Cakóháza Fő u. 41.), Arrabona-Work Kft. (H-9165 Cakóháza Fő u. 41.), Gamaxmédia Kft. (H-9165 Cakóháza Fő u. 41.), Parisatis Magyarország Kft. (H-2161 Csomád, Akácos utca 15.), or Segéd-Erő Szociális Szövetkezet ('Helping Force Social Cooperative'; H-9165 Cakóháza Fő u. 41.), Humán Labor Munkaerőszolgáltató Kft. ('Human Labor Employment Services Llc. '; H-9165 Cakóháza Fő u. 41.).

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

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

Pannon-Work Zrt., Pannon-Work Consulting Kft., Pannon-Work Iskolaszövetkezet (Pannon-Work School Cooperative), Pannon Student Iskolaszövetkezet (Pannon Student School Cooperative), Munka Mindenkinek Szociális Szövetkezet (Work for All Social Cooperative), MELÓ-CLUB Munkaszervező Szociális Szövetkezet (MELÓ-CLUB Work Organizing Social Cooperative), Pannon-Work Silver Közérdekű Nyugdíjas Szövetkezet (Pannon-Work Silver Public Interest Retired Cooperative), Gamax Kft., Pannon-Work Diákmunkaszervező Kft. (Pannon-Work Student Work Organising Llc.), Telekontakt Marketing Kft., Arrabona-Work Kft., Gamaxmédia Kft., Parisatis Magyarország Kft. (Parisatis Hungary Llc.), Segéd-Erő Szociális Szövetkezet (Helping Force Social Cooperative), Humán Labor Kft. (Human Labor Llc.), Pannon-Work Future kisgyermekkel otthon lévők szövetkezete (Pannon-Work Future cooperative for people with young children at home).

Data Protection Officer: Beáta Torma
Postal mailing address: H-9027 Győr Budai u. 5/a.
E-mail account: adatvedelem@pannonwork.hu

Phone: +36 96 508 000

Regarding borrowing

When our temporary agency workers are employed by our partners (borrowers), the given borrower will also be a joint data controller with us in the processing of their personal data relating to their employment, as the employer functions required for employment are shared between the member of Pannon-Work acting as a temporary agency and the given borrower.

The establishment and termination of the employment relationship and the payment of wages are the responsibility of the lender, while the giving of instructions, the scheduling of working hours, and the performance of duties related to occupational health and safety and accidents at work are the responsibility of the borrower.

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

Contact details of the data controller

On the basis of agreements concluded by and between members of the Pannon-Work group of companies and our borrowing partners, the member of Pannon-Work acting as the lender shall ensure that employees are informed and that the rights set out in Chapter VI of this Information note are exercised and that enquiries are answered.

Our contact details in issues related to data management:

Pannon-Work Zrt.

Postal mailing address: H-1114 Budapest, Bartók Béla út 15/D II/18.

E-mail account: adatvedelem@pannonwork.hu

Phone: +36-1-269-3631

Website: www.pannonwork.hu

Gamax Kft.

Postal mailing address: H-1114 Budapest, Bartók Béla út 15/d. II/18.

E-mail account: gamax@gamax.hu

Phone: +36-1-372-0692

Website: www.gamax.hu

Pannon-Work Consulting Kft.

Postal mailing address: H-1114 Budapest, Bartók Béla út 15. D. ép. 2. em. 18.

E-mail account: adatvedelem@pannonwork.hu

Phone: +36-1-269-3631

Website: www.pannonwork.hu

Munka Mindenkinek Szociális Szövetkezet (Work for All Social Cooperative)

Postal mailing address: H-9165 Cakóháza Fő u. 41.

E-mail account: adatvedelem@pannonwork.hu

Phone: +36-1-269-3631

Website: www.pannonwork.hu

MELŐ-CLUB Munkaszervező Szociális Szövetkezet (Meló-Club Work Organisation Social Cooperative)

Postal mailing address: H-2161 Csomád, Akácós utca 15.
E-mail account: adatvedelem@pannonwork.hu
Phone: +36-1-269-3631
Website: www.pannonwork.hu

Telekontakt Marketing Kft.

Postal mailing address: H-9165 Cakóháza Fő u. 41.
E-mail account: adatvedelem@pannonwork.hu
Phone: +36-96-508-000
Website: www.pannonwork.hu

Arrabona-Work Kft.

Postal mailing address: H-9165 Cakóháza Fő u. 41.
E-mail account: adatvedelem@pannonwork.hu
Phone: +36-1-269-3631
Website: www.pannonwork.hu

GamaxMédia Kft.

Postal mailing address: H-9165 Cakóháza Fő u. 41.
E-mail account: adatvedelem@pannonwork.hu
Phone: +36-1-269-3631
Website: www.pannonwork.hu

Parisatis Magyarország Kft. (Parisatis Hungary Llc.)

Postal mailing address: H-2161 Csomád, Akácós utca 15.
E-mail account: adatvedelem@pannonwork.hu
Phone: +36-1-269-3631
Website: www.pannonwork.hu

Segéd-Erő Szociális Szövetkezet (Helping Force Social Cooperative)

Postal mailing address: H-9165 Cakóháza Fő u. 41.
E-mail account: adatvedelem@pannonwork.hu
Phone: +36-1-269-3631
Website: www.pannonwork.hu

Humán Labor Kft. (Human Labor Llc.)

Postal mailing address: H-9165 Cakóháza Fő u. 41.
E-mail account: adatvedelem@pannonwork.hu
Phone: +36-1-269-3631
Website: www.pannonwork.hu

2. Data management related to the employment relationship

2/A Pre-screening prior to lending

The purpose of data management

Some of our borrower partners may require us to screen candidates who have previously been employed by them or a member of their group of companies before they can hire candidates out, in order to decide whether or not they wish to work with you again in the future.

The scope of data managed

For the purposes according to this clause, the first name, last name, origin, county of residence of the employee concerned or of the person interested in the establishment of an employment relationship, and, if known to us, whether or not the employee has previously worked for the given borrower or a company in its group, and the employee's CV will be forwarded to our borrowing partner. In the case of certain partners, the tax identification number of the data subject may also be transmitted for identification purposes.

The legal basis of data management

The legal basis for data management is the preliminary, voluntary, informed consent of the data subject (Article 6 (1) a) of the GDPR). In the absence of consent, there is a possibility that the data subject will not be loaned to the relevant borrowing partner.

Duration of data management

For the above purposes, the personal data of the data subject will be processed until we receive feedback from our borrowing partner. If consent is withdrawn, the processing of the personal data concerned for this purpose will also cease.

2/B Establishment, performance and termination of an employment relationship

The purpose of data management

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

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

In addition, an aim occurring during the existence of the employment relationship is to fulfil the rights and obligations provided for in the Labour Code. For example, the borrower is obliged to keep records of your working time, while we, as the lender, are obliged to keep records of the wages paid, the amount of deductions made from them and the legal title of the right to make deductions from them. We also need your bank account number to be able to pay your wages. In order to grant the additional leave provided for in the Labour Code, we need to know, among other things, whether or not you have children and how old they are.

In order to check the maximum loan period of 5 years, we need to know whether or not you have worked on loan during the previous 6 months and, if so, with which borrowing company and for how long.

The scope of data processed and their source

You provide some of the personal data we process directly to us for the purposes of entering into a contract by means of the personal data sheet, the employment contract, the personal data sheet completed at the time of entering into the employment contract and other forms and declarations (e.g. to claim additional leave), and forms completed and submitted to us in order to claim tax benefits and social security benefits.

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

In the context of the above, you may provide personal data not only about yourself but also about your relatives (spouse, child) (e.g. in connection with the additional leave, family tax allowance). Providing information on your relative is required by the relevant legislation.

A detailed list of the personal data processed on the basis of the employment relationship (including also data relating to relatives) is set out in Annex 1 to this Information note.

The legal basis of data management

Your personal data will be processed for the above purposes mainly on the basis of the authorisation under Article 6 (1) (b) of the GDPR on the basis of an employment contract concluded with you.

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

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

Article 6 (1) (a) of the GDPR also allows for processing based on consent. Rarely, but sometimes in the context of an employment relationship, data are processed on this legal basis. Refusal to give consent in these cases shall not result in any disadvantage for you. If you later on wish to withdraw your consent, you may do so at any time, without giving any reason. You will not suffer any adverse legal consequences as a result of withdrawing your consent. However, the withdrawal of consent does not affect the lawfulness of the prior data management. You can communicate the withdrawal of consent in the same way as you gave it, or you can communicate it to your line manager or the person who employs you.

Data management is based on your consent in the following cases, for example:

- capturing and publishing a picture or video made of you at a team building event;
- delivering to us the menu of your choice for the event;
- indicating e.g. your garment size for marketing materials provided to you (e.g. company T-shirts);
- persons to be notified in the event of an accident and their contact details;
- etc.

Data management may also be based on the legitimate interests of our company or a third party (Article 6 (1) (f) of the GDPR).

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

Duration of data management

Data type	Retention period
Employment contracts, working time records and pay slips	These documents and the data contained therein will be retained until the end of 5 years after the employee concerned reaches the retirement age pursuant to Section 99/A of Act LXXXI of 1997 on Social Security Pension Benefits (hereinafter referred to as: the Tny.).
a request for additional leave in the case of the birth of a child, a copy of the child's birth certificate, a copy of the death certificate in the case of stillbirth;	the retention period for accounting documents pursuant to Article 1 Paragraph (5) of Government Decree no. 350/2014 (29 December) on the use of paternity leave and the reimbursement of expenses related to paternity leave in the event of the birth of a child, i.e. 8 years;
additional supporting documents (e.g. employee declarations for payroll), tax returns, data sheets, etc., on which the tax and tax advances are based;	until the limitation period for the right to assess the tax, which, as a general rule, expires 5 years after the last day of the year in which the submission of the tax return was due or, failing this, the tax had to be paid (Art. 202-203)
Other employment documents, declarations (e.g. job role aptitude statements)	until the expiry of the limitation period under labour law (3 years, as a general rule) (Section 286 of the Labour Code).
Data that we process on the basis of your consent (e.g. your photo, personal data provided in connection with a company event, etc.)	We will process it until your consent is withdrawn or the purpose of the processing ceases.

After the expiry of the above retention period, the document or personal data concerned will be destroyed. We keep a record of the fact and date of destruction or shredding.

3. Who can access your personal information?

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

In case of temporary employment of an employee, our borrowing partner receives some personal data (the temporary employee's name, mother's name, date and place of birth, place

of residence, tax identification number, data on educational attainment, training, experience if necessary for the job, salary data) from us, while other personal data is collected directly by our borrowing partner (working hours, data on work accidents, etc.).

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

If we pursue a legal claim against you, we will, on the basis of our legitimate interest in pursuing the claim, transmit your relevant personal data necessary for the pursuit of the claim to the lawyer or law firm entrusted.

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

The members of the Pannon-Work group of companies also operate a quality management system (ISO 9001). The certification for Pannon-Work Zrt., Pannon-Work School Cooperative, SegédErő Work Organising Social Cooperative Meló-Club Work Organising Social Cooperative, Pannon-Work Future Cooperative of people at home with small children, Work for All Social Cooperative and Pannon-Work Silver Public Interest Pensioner Cooperative is carried out by EMT Zrt. (H-2040 Budaörs, Muskátli utca 3.), while for Gamax Kft. by the Hungarian Standards Institution (H-1082 Budapest, Horváth Mihály tér 1.). Within this framework, the persons representing EMT Zrt. and the Hungarian Standards Institution are authorized to inspect the documents and systems of the company they are examining, which are justified from the point of view of certification. The certification companies do not use the data for their own purposes, they are only authorized to know the data for the purpose of quality certification of the given Pannon-Work member.

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

The given member of Pannon-Work	Auditing company
Pannon-Work Zrt. Pannon-Work Consulting Kft. MELÓ-CLUB Munkaszervező Szociális Szövetkezet Munka Mindenkinek Szociális Szövetkezet SegédErő Szociális Szövetkezet Telekontakt Kft. Arrabona Work Kft. GAmaxMédia Kft.	Pannónia Könyvvizsgáló Korlátolt Felelősségű Társaság ('Pannónia Auditing Limited Liability Company'; H-9027 Győr, Budai utca 5/a.)
Gamax Kft.	"EXPERT" Könyvvizsgáló és Tanácsadó Korlátolt Felelősségű Társaság ("EXPERT" Auditing and Consulting Limited Liability Company) HU-2500 Esztergom, Révész Béla utca 7.

Our data processors

We may use data processors to perform certain data management operations related to the above data management. Data processors act in accordance with the law and our instructions when carrying out data processing operations.

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

The data processors we use and their tasks:

The data processor	Data controller for which the data processor concerned performs a data processing task	The activity performed by the data processor in relation to data management
EDUTAX Kft. Registered address: H-9027 Győr, Budai út 5/a Contact: www.edutax.hu	MELÓ-CLUB Munkaszervező Szociális Szövetkezet (Meló-Club Work Organisation Social Cooperative) Munka Mindenkinek Szociális Szövetkezet (Work for All Social Cooperative) Segéd-Erő Szociális Szövetkezet (Helping Force Social Cooperative) Telekontakt Marketing Kft. Arrabona-Work Kft.	Activities: payroll, social security administration
HR-FACE Kft. H-8000 Székesfehérvár, Seregélyesi út 113. Contact: www.hr-face.hu	Pannon-Work Zrt. Gamax Kft. Pannon-Work Consulting Kft.	Activities: payroll, social security administration
Bearmentor Kft. (Bearmentor Llc.) Registered address: H-9027 Győr Budai u. 5/a. Contact details: +36-70-9452-218	Pannon-Work Zrt. Munka Mindenkinek Szociális Szövetkezet (Work for All Social Cooperative) MELÓ-CLUB Munkaszervező Szociális Szövetkezet (Meló-Club Work Organisation Social Cooperative) Segéd-Erő Szociális Szövetkezet (Helping Force Social Cooperative) Gamax Kft.	Activities: performance of OHS-related activities

<p>Iron Mountain Magyarország Kft. (Iron Mountain Hungary Llc.)</p> <p>Registered address: H-1093 Budapest, Czuczor utca 10. IV. and V.</p> <p>Contact: www.ironmountain.hu</p>	<p>All members of the Pannon-Work group of companies</p>	<p>Activities: document shredding</p>
<p>Travel Online Kft. (Travel Online Llc.)</p> <p>Registered address: H-2800 Tatabánya Dózsa Gy. út 36.</p>	<p>Pannon-Work Zrt. Pannon-Work Consulting Kft. Telekontakt Marketing Kft. Arrabona-Work Kft. Parisatis Kft.</p>	<p>Activity: provision of cloud-based property management software</p>

4. Data security

In order to maintain the security and confidentiality of the data we process and to prevent the destruction, unauthorised use or alteration of the data, we apply the following IT and other data security and organisational measures in particular. In addition, we keep abreast of technological developments, the available technical, technological and organisational solutions, and apply solutions that are appropriate to the level of protection justified by our data management operations.

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

When storing documents containing personal data kept on paper, we ensure their confidentiality (lockable cabinet) and their integrity and legibility (protection from sunlight, heat and water). Archived documents containing personal data are stored in an orderly manner in a lockable cabinet or in an office to which employees who are authorized to handle the documents stored there have a key. No other person shall be present in the rooms concerned in the absence of the employee authorised to process the data. The last employee authorized to handle data who leaves the room shall ensure that no unauthorized person remains in the room after leaving and shall lock the door.

As part of the above, we set up separate user accounts (privileges) with unique password protection for software to ensure that everyone has access to only the amount and type of data they are authorized to. We ensure that data is backed up to maintain its authenticity and integrity, and that the original data can be restored in the event of any potential destruction or alteration.

5. HANDLING OF PRIVACY INCIDENTS

All employees are required to notify us immediately if they become aware of a data protection incident. A privacy incident is any case whereby personal data is accessed by an unauthorized

person or is destroyed, lost or altered, for example, if our systems are hacked or stored employment contracts are destroyed or a company mobile phone or laptop disappears.

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

6. Your rights

Withdrawal of the consent

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

Request for information / Right of access

You can use the contact details provided in Article 1 to ask us at any time whether or not we are processing your personal data and, if so, to provide you with further information about the following: *the purposes and legal basis of the data management, the personal data we process, the categories of personal data we process, the recipients or categories of recipients (including also data processors we use) to whom or which we have disclosed or will disclose the personal data (in case of transfers to third countries, the safeguards to ensure adequate protection of the data), the legal basis for the data transmission, the data storage period, the data subject's right to obtain from the data controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data, the right to lodge a complaint with the National Data Protection and Information Authority (NAIH), the source of the data, the circumstances of the possible privacy incident, its effects and the measures taken to remedy it.*

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

Right to rectify or supplement

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

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

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

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

Deletion may also be possible, if:

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

Objection

In the case of data management based on legitimate interest, you may object to our data management if you consider that the data management is prejudicial to you. In the event of an objection, personal data will be deleted, unless their retention is necessary for the purposes of an overriding legitimate interest.

Restriction of data management

In the course of the data management, you may request the restriction of data management, if: (i) you have made a request for the rectification of personal data and time is needed to assess the accuracy of the data; (ii) the processing is unlawful but you object to the deletion of the data; (iii) you need the data in order to exercise or defend your legal rights and we should delete the data because the original purpose of the processing has ceased to exist; (iv) you have objected to the data management and we need time to verify whether there are other important reasons for hindering the deletion.

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

In case of restriction of processing, you will be informed in advance of any release of the restriction.

Right to data portability

In case the data processing is carried out by automated (i.e. electronic) means on the basis of your consent or on the legal basis of the performance of a contract (e.g. an employment contract), you may request that the personal data we have about you is provided to you or a person you designate in a commonly known and easily usable electronic format. As part of data portability, you can, for example, request us to carry your data stored in our HR and payroll systems.

7. Submitting and responding to requests

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

Your request will be fulfilled within 1 month. In case of need, we are authorized to extend this period by a further 2 months, and we will send you a reasoned explanation thereof.

Well-founded requests will be fulfilled free of charge. However, if the request is manifestly unfounded or excessive, in particular because of its repetitive nature, we are authorized to charge a reasonable fee or even refuse to act on the basis of the request.

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

8. Compensation for damages and grievance fee

If we cause damage to you or another person by unlawful or unsecure processing of your personal data, you or the person who has suffered damage may enforce his or her claim for damages against us. And, if we infringe your privacy rights in this way, you are authorized to enforce a claim for a grievance fee.

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

9. How to enforce claims

9.1. Contacting the data controller

If you believe that we are not acting lawfully in processing your personal data, please first contact us as the data controller with your comment or claim at one of the contact details indicated in Article 1 in order to enable us to process your comments as quickly and efficiently as possible.

Please note that you can also contact the Data Protection Officer, who is the following person in the case of the Pannon-Work group of companies: E-mail address of Beáta Torma: adatvedelem@pannonwork.hu.

9.2. Turning to a court

Please note that you are also authorized to pursue your claim in court. The tribunal courts have jurisdiction to hear the case. You can also bring the case before the courts where we are based or where you live or reside.

9.3. Contacting the authority for data protection, making a complaint

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

2023.06.09.

Kölcsönzés

Website: <http://naih.hu>

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Postal address: H-1363 Budapest, P.O.Box: 9.

Budapest, 09.06.2023

Pannon-Work group of companies
Data Controller

1. Annex No. personal data managed in the workplace and legal basis for data management

Employee identification, document verification

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

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

A masked copy of the identity documents can be made to ensure the accuracy and subsequent verification of the data recording. A masked copy means that only the personal information that the employee is otherwise obliged to provide to our company can remain legible/recognisable on the copy. As such, the copy is made solely for the purpose of verifying the accuracy of the data recording and for subsequent verification.

Data content of the masked copy:

Personal identity card	Driving license*	Address card	Tax card	Hungarian social security number (TAJ card)
First and last name Birth name; Place and date of birth, citizenship, mother's birth name; Gender	First and last name; Place and date of birth, citizenship	First and last name; Place and date of birth; Mother's name; Place of residence and place of stay	First and last name; Mother's name; Place and date of birth; Tax identification number.	First and last name; Date of birth; Hungarian social security number (TAJ)

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

Employee registration with tax and social security authorities

As an employer, our company employing you must report your following data – before the start of your employment – to the state tax and customs authority (National Tax and Customs Office) pursuant to Article 3 of Annex no. 1 of Act CL of 2017 on the Rules of Taxation ('Art.') (or, prior to 1 January, 2018, pursuant to Section 16 Paragraph (4) of Act XCII of 2003 on the Rules of Taxation (the 'old Art.') (the legal basis):

- First and last name;
- Tax identification number,

- Date of birth;
- The start, code and termination of the insurance relationship;
- The period of interruption of the insurance;
- Weekly number of working hours;
- FEOR (Hungarian Standard Classification of Occupation) number;
- Hungarian social security number (TAJ);
- and if the insured person does not have a tax identification number: his/her first name and last name at birth, place of birth, mother's first name and last name at birth and citizenship of the insured person;

The tax authority, as the gateway of the single-gateway system, transmits the data set out in Articles 6-7-8 of Annex No. 1 to the Art. *to the health insurance register of the insured, the register of the state vocational training and adult education body operating the career tracking system and the labour authority.*

We are obliged to provide the borrower with a copy of the notification at the borrower's request pursuant to Section 217 Paragraph (4) (a) of the Labour Code (hereinafter referred to as: the 'LC').

In accordance with Section 78 of the Art., our company will retain the notification documents submitted to the tax authority until the right to assess the tax expires.

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

Management of data relating to previous employment

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

In relation to your previous employment, we also need to know whether and for how long you have worked on a temporary basis for the company to which you would be seconded during the previous 6 months. (Section 214 Paragraph (2) of the LC)

Social security booklet

Pursuant to the provisions of Government Decree No. 217/1997 (1 December) on the implementation of the Act on Compulsory Health Insurance (Ebtv. Vhr., the legal basis), you, as the insured person, must provide our company with a form called "Certificate of Insurance Relationship and Health Insurance Benefits" (commonly known as the Social security booklet) when you establish your employment relationship. Our company enters the start of the insurance relationship in the social security booklet and keeps it until the termination of the employment relationship.

When the employment relationship is terminated, we will record the termination of the insurance relationship in the Booklet, and the fact that the form "Certificate of Income for the Determination of Health Insurance Benefits" (Certificate of Income) has been issued, and the social security booklet will be given to you as an employee on the day of termination of the insurance relationship. [Section 37 Paragraph (1) of the Ebtv. Vhr.] If a new insured relationship

is established during the employment relationship, the new employer will enter the insurance data in the social security booklet as described above and return it to us.

Examination by the company doctor (occupational medical fitness)

Before the employment relationship is established, as well as periodically and after an extended period of absence, an occupational medical fitness examination is carried out (pursuant to Articles 4, 6 and 7 of Decree No. 33/1998 of the Minister of Welfare). The medical data obtained during the fitness assessment are known and kept by the company doctor. Our company and the borrowing employer **will only be informed whether or not you, as an employee, are fit (not/periodically not fit) for the job** in which the borrower wishes to employ you.

The medical fitness test is necessary (purpose) to enable the borrowing employer to ensure safe working conditions that do not jeopardize health, working conditions adapting to health status and working hours (Section 51 Paragraph (4) and Section 60 of the Labour Code).

The occupational medical fitness certificates issued by the company doctor are kept for 3 years after the failure (if not fit) or termination of the employment relationship for use in the enforcement of legal claims.

Data management related to the performance of the employment contract

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

Personal information	<u>Relevant section of the Labour Code</u>
Usual personal information related to the employment contract or temporary agency work: <ul style="list-style-type: none"> - First name and last name - First name and last name at birth - Mother's first name and last name at birth - Place and date of birth - Permanent place of residence, place of stay - Position - Base wage - Additional wage elements - Place of work - Working hours - Duration of employment (for a definite / indefinite period of time) - Starting date of the employment relationship - Work order - The fact and duration of the probationary period - Signature of the employee - Notice period - The extent of severance pay 	<p>Section 45 of the LC (on the mandatory content elements of the employment contract)</p> <p>Section 34 Paragraph (2) of the LC (on the minimum age of the employee)</p> <p>Section 48 of the LC (on recording the starting date of employment)</p> <p>Section 218 Paragraph (3) of the LC (provision of information before temporary agency work)</p> <p>Section 99/A of Act LXXXI of 1997 on Social Insurance Pension Benefits (Act on the Certification of Length of Service Period)</p>

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

	<p>Section 66 Paragraph (6) of the LC (termination limit)</p> <p>Section 113 Paragraph (1)(b) of the LC (different rules on working time and rest periods)</p> <p>Section 113 Paragraph (5) of the LC (different rules on working time and rest periods)</p>
The fact of long-term personal care of a relative of the worker	Section 53 Paragraph (3) of the LC (work at another place of work)
Leave and sick leave records	Section 134 of the LC (records of working time and rest periods)
<p>Within the legal framework provided by the Labour Code, we process the following personal data in connection with the use of sick leave and compensatory leave, paternity leave, parental leave, maternity leave and unpaid leave:</p> <ul style="list-style-type: none"> - Data content of the certificate of incapacity to work (own or child's medical certificate) in case of sick leave - Data required for the purpose of the compensatory leave - Name of the child under 17, date of birth, details of disability and a copy of the resolution on the increased family allowance to prove it - Information that the worker has altered working abilities, entitled to disability allowance or entitled to a personal allowance for the blind and a copy of the relevant resolution to prove this - When taking maternity and unpaid leave - The expected date of birth of the child - The fact of the child's treatment in an institution for the care of premature infants, the date of leaving the institution - The fact of stillbirth of the child, date of death - the fact and date of the child's temporary placement, temporary or permanent foster placement and placement in a residential social institution for more than 30 days - the duration of the payment of childcare allowance, childcare assistance benefit – in 	<p>Section 118 of the LC (compensatory leave, paternity leave)</p> <p>Section 118/A. of the LC (parental leave)</p> <p>Section 120 of the LC (compensatory leave)</p> <p>Section 126 of the LC (sick leave)</p> <p>Section 65 Paragraph (3) of the LC (prohibition of employment termination)</p> <p>Section 127-132 of the LC (rules on maternity and unpaid leave)</p>

<p>the case of unpaid leave for the personal care of a child under 10 years of age</p> <ul style="list-style-type: none"> - The fact of personal care for a relative in the case of unpaid leave taken for this purpose - The fact and duration of fulfilment of actual voluntary military service as a reserve, in the case of unpaid leave on this basis - In case of paternity or parental leave: name of the applicant, place and date of birth, name and date of birth of the child; in case of adoption, number and date of the resolution on authorisation and the date on which it became final; number of the birth certificate 	
<p>In case of proof of absence, additional data not previously mentioned</p> <ul style="list-style-type: none"> - In the case of incapacity for work or other incapacity to perform the job for health reasons, the fact and duration of such incapacity; - Treatment in a health establishment in connection with the human reproductive process, as defined by the law; - Participation in a compulsory medical examination; - Participation in a blood donation, for a maximum of 4 hours; - If they are nursing mothers, for one hour twice daily, or two hours twice daily in the case of twins during the first six months of breastfeeding, and thereafter for one hour daily, or two hours daily in the case of twins, until the end of the ninth month; - Two working days in case of death of a relative; - For the duration of classes in the case of employees pursuing elementary school studies, for the duration of training if participating in initial and continuing training by agreement of the parties; - While on duty as a volunteer or establishment firefighter; - At the request of a court or public authority, or for the time necessary to attend the proceedings in person; - For a maximum of ten working days per year during the period of preparation of a legal adoption, for the purpose of meeting the adoptable child in person (a certificate issued by the adoption organisation is required); 	<p>Section 55 Paragraph (1) of the LC (certified absence)</p>

<ul style="list-style-type: none"> - For a period of absence justified by a particularly serious personal, family or unforeseeable reason; - Up to five working days a year for the purpose of personal care for a relative who needs care for serious health reasons or for a person living in the same household as the employee (a doctor's certificate is required). 	
Details of any disciplinary action (warning, resolution on disciplinary action)	Section 56 of the LC (disciplinary rules)
The fact of receipt of rehabilitation benefit or rehabilitation allowance	Section 66 Paragraph (7) of the LC (termination limit)
Whether any health damage to the extent of at least fifty percent has been determined by a rehabilitation expert body	Section 53 Paragraph (3) of the LC (work at another place of work)

Data required for payroll accounting and certain employer contributions

We process the following data/documents for the purpose of payroll accounting on a statutory basis in the context of fulfilling social security and tax obligations in the context of fulfilment of the employment contract:

Personal information	The legal basis of data management
Payroll accounting <ul style="list-style-type: none"> - Base wage - Additional pay elements (wage supplements, bonuses, performance pay, fringe benefits) - Working time records - Performance-related data in the case of performance pay - Data on deductions, blocked amounts from the wage, the data content of resolutions (e.g. amount of alimony (child maintenance fee), amount of damage caused to the employer) - to calculate and declare taxes deducted from wages - Data provided on the family tax allowance form (employee's name, tax identification number, dependents' name, tax identification number, date of change, legal title of entitlement, the spouse's name, tax identification number, place of residence, mother's maiden name) - Data provided on the first marriage benefit form (employee's name, tax identification number, the 	<p>Section 134 of the LC (working time records)</p> <p>Section 136-165 of the LC (provisions on wages)</p> <p>until 31 December, 2017: Act XCII of 2003 on the Rules of Taxation (the old 'Art.')</p> <p>after 1 January, 2018: Act CL of 2017 on the Rules of Taxation (the new 'Art.')</p> <p>Concerning the social security (TAJ) number and the tax identification number in general: Act XX of 1996 on the means of identification replacing the personal identification number and on the use of identification codes</p>

<p>spouse's name, tax identification number, date of marriage)</p> <ul style="list-style-type: none"> - Information needed to claim tax-free schoolstart allowance (the fact of entitlement to family allowance) - Declarations of membership of voluntary health insurance funds, pension insurance funds - A declaration of receipt of a social security cash benefit, the type of benefit and the fact of having at least three dependent children, in order to claim a social contribution tax credit - in order to claim the employer's tax allowance for career starters (duration of previous insurance relationship) - The data required for the assessment of the family tax allowance for mothers under 30 years of age, provided on the tax advance return form (name of the employee, tax identification number, tax identification number or fetal status of the child entitled to the allowance, etc.) - Data provided on the form for tax relief for young people under 25 (name of the employee, tax identification number, year of submission of the declaration) - Data provided on the tax advance declaration form for mothers of four or more children (employee's name, tax identification number, children's names, place and date of birth, mother's name, tax identification number) - Exit papers from the previous workplace - If unemployed, proof of this status - Resolution certifying the reduced capacity for work of an employee with reduced capacity for work, specialist medical opinion - Tax identification number - Hungarian social security number (TAJ) - Bank account number - Wage or salary paid - Citizenship, tax residence - Marital status - Gender - Place of stay - Pensioner registration number (for retired employees) - Resolution on pensioner status 	<p>(in particular Articles 15, 19, 23, and 25)</p> <p>Act LXXXI of 1997 on Social Security Pension Benefits (Act on the Verification of Pension Entitlement)</p> <p>Act LXXX of 1997 on persons entitled to obtain the services of social security and private pension, and the coverage of such services ('Tbj.'). Section 44 Paragraphs (1) and (3)</p> <p>In connection with certain tax benefits, Act CXVII of 1995 on Personal Income Tax – Section 29/A-B (on family tax benefits), Section 29/C (on the initial allowance for first-time married couples), Section 29/D (allowance for mothers with four or more children), Section 29/E (personal allowance), Section 29/F (allowance for young people under 25)</p> <p>Chapter IX of Act CLVI of 2011 amending certain tax laws and other related acts on social contribution tax</p>
<p>In the case of cost accounting for a private owned vehicle (POV) Copy of a receipt proving payment of compulsory motor insurance by the end of 2017</p>	<p>Article 9 of Chapter IV of Annex 3 to the Personal Income Tax Act</p>

From January 2018, a copy of the vehicle registration document (or a certificate issued by the transport authority in case of withdrawal)	
Travel cost reimbursement Employee declaration of place of residence, place of stay, expense account details	Article 7 of Government Decree No. 39/2010 (II. 26.) on the reimbursement of commuting expenses (in connection with the settlement of commuting expenses)

Register of social security benefits

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

Furthermore, Pannon-Work Zrt., Pannon-Work Consulting Kft. and Gamax Kft., as social security paying agent offices pursuant to Government Decree No. 217/1997 (XII. 1.) of 1 December (Ebtvr.) implementing the Ebtv.:

- keep records of the amount of health insurance cash benefits, sickness benefits, accident benefits, infant care benefits, child care benefits awarded to you (benefit log) and the underlying documentation;
- keep the documents on which the assessment of the occupational accident and occupational disease is based;
- keep records of sick pay contributions, repayments and keep the underlying documents;
- submit a monthly statement of the cash benefits and accident sickness benefits paid to the government office where they are established (Section 38/A Paragraph (1) of the Ebtvr.);
- provide data on payments and repayments to the Health Insurance Fund;
- provide other data to the professional and financial control body(ies) of the health insurance company (Section 81 Paragraph (1) of the Ebtv.);
- shall transmit to the Health Insurance Fund the data according to the application form for the payment of cash benefits that may be granted on the basis of equity, such as the payment of sickness benefit in one's own right, childcare sickness benefit, infant care allowance, childcare allowance, pursuant to Section 50 of Act LXXXIII of 1997.
- pursuant to Section 80 Paragraph (4) of Act LXXXIII of 1997 on Compulsory Health Insurance Benefits, our company is obliged to report any health insurance benefits in cash ("passive beneficiary") paid after the termination of insurance to the metropolitan or county-level government office competent for the health insurance fund of the place of its registered office;
- Pannon-Work Zrt. and Gamax Kft. keep a register of the beneficiaries of the benefits with the following content and forward it to the health insurance department of the social security division of the competent government office: the insured person's name, social security (TAJ) number, birth data, mother's name, registration sheet number, in case of sickness benefits for childcare, pregnancy and childbed allowance, infant care

allowance and childcare allowance, data on children, and in case of an accident at work, the FEOR (Hungarian Standard Classification of Occupation) number and occupation.

Data management performed as a paying agent, such as the storage of documents, will continue until the paying agent ceases to be a paying agent in order to allow the competent government office to carry out the final audit. The documents can then be destroyed.

Data management related to occupational health and safety and accidents at work

Register of personal protective equipment

The handing over of protective equipment and clothing to workers is recorded in a protocol. Receipt and return protocols shall include the name of the employee concerned, the date of receipt and the name and size of the protective equipment received.

In compliance with Article 3 (3) of Decree No. 65/1999. (22 December) EüM of the Minister of Health on the minimum safety and health protection requirements for the use of personal protective equipment of employees in the workplace, our company keeps up-to-date records (legal basis) of the documents related to the supply of protective equipment (handover and receipt protocols, return protocols) and presents them upon request of the inspecting authority.

Data management in the context of an accident at work

The reporting, investigation and registration of accidents at work and occupational diseases (purpose) is a legal obligation of the party acting as a borrower (legal basis: Sections 64-69 of Act XCIII of 1993 on Occupational Health and Safety and Articles 5-10 of Decree No. 5/1993 (26 December) of the Ministry of Labour and Social Affairs).

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

- Name (including also birth name)
- Mother's name
- Social security identification number (TAJ)
- Place and date of birth
- Gender
- Citizenship
- Place of residence (residential address)
- The number of accident at work, starting with 1 each year
- The job role of the injured person
- The date and time, location and character of the injury and a brief description of the facts
- The measures taken to provide the necessary care to the injured person
- Whether or not the injured person continued with their work
- The ordinal number in the registration book of accidents at work.

In the case of an accident at work involving incapacity for work, the borrower is also **obliged to record a protocol on the accident at work** and to investigate the accident at work involving incapacity for work lasting more than 3 working days. The opening of an investigation into an

accident at work must also be notified to the occupational doctor, who may participate in the investigation at his or her discretion. In the event of a serious accident, the company doctor must be involved. A copy of the investigation documentation is given by the borrower to the lender.

The protocol on the accident at work must be forwarded to:

- a) you as the the injured person, or in case of death to your relative;
- b) to the competent occupational health and safety authority according to the site of occupational accident on the occupational accident resulting in death or incapacity for work for longer than three days;
- c) in the case of posting abroad or foreign service, to the competent OHS authority of the place of establishment;
- d) the district (metropolitan district) office of the metropolitan and county-level government office acting in the capacity of a health insurance fund;
- e) in case of temporary employment, to the lender employer.

Serious accidents at work must be reported immediately to the occupational health and safety authority (the district office of the competent metropolitan and county-level government office acting as the occupational health and safety authority), which immediately forwards the report to the Ministry headed by the Minister in charge of employment policy.

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

- a) the protocols on hearing;
- b) the document proving professional qualifications;
- c) the document certifying the right to handle/operate;
- d) the document certifying medical fitness;
- e) the documentary evidence of the placing in service;
- f) the document documenting the periodic safety review;
- g) the document documenting the risk assessment,
- h) photo recordings, video recordings;
- i) the relevant parts of the internal rules and policies.