

Data processing for security purposes: operation of entry control systems, camera systems, breathalyser test, baggage and cabinet control

Future Security Service Kft. (registered seat: 1148 Budapest, Fogarasi út 5.; telephone number: (1) 267-6706; email address: mail@future-security.hu) provides personal security and property protection services to Egis in relation to Egis facilities. Services include reception (entry), guarding (breathalyser test and baggage/locker inspection) and technical on-call services (monitoring cameras, providing access to camera recordings). In doing so, it has access to the personal data of individuals for the purposes of the data processing for the following purposes.

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| <p>1. Operating the entry control system: recording the times and places of entering and leaving the Egis headquarters, sites, branch (hereinafter referred to as "Egis' territories"), including the individual buildings by means of registered entry cards.</p> | <p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest is the protection of the property of Egis (including data assets) and the protection of the life and bodily integrity of the persons staying in the premises of Egis.</p> <p>According to the provisions of Egis, a company entitled to use the area protected by the entry control system, only those entitled to do so may enter the protected area pursuant to Section 32 of Property Protection Act.</p> <p>The area of Egis is a chemical environment, where raw materials and preparations that are harmful to health, fire and explosion</p> | <p>Relevant individuals: persons entering the Egis headquarters, sites, branch.</p> <p>Scope of data in the case of single entries: movement data linked to the registered entry card, (date and place of entry/exit), name of the persons entering, presentation of an identification document with a photo for the verification of identity without recording any data.</p> <p>Scope of data in the case of regular card use: movement data associated with the registered entry card, (date and place of entry/exit), name of the persons entering, name of the organization unit where he/she performs work in the territory of Egis and the</p> | <p>In the case of single entries (by means of a guest card - the guest card is validated for one day, at 18:00 that day the card authorization expires) Egis deletes the movement data 24 hours after the card authorization expires.</p> <p>Egis keeps the data recorded upon entry for 1 month.</p> <p>In the case of regular card use, (any card that authorises access for a period longer than a given day, e.g. to external construction workers) Egis deletes the movement data after 6 months or 24 hours after the card authorization expires.</p> <p>Due to accounting considerations,</p> |

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| | <p>hazardous substances are manufactured, and preparations containing psychotropic substances are manufactured and stored Egis therefore must control the right to enter and exit. The above conditions are provided by Egis by operating the electronic entry system.</p> <p>The electronic entry system also strengthens the accountability of Egis as a data controller, as by operating this system it can ensure that only authorized colleagues enter certain buildings. The entry control system therefore also serves as a physical protection measure (from a data security point of view) to prevent unauthorized entry and access.</p> | <p>name of the company employing him/her.</p> <p>In the event of a security problem that may arise (e.g. theft, burglary) Egis may inspect entries to offices and other premises.</p> <p>In addition, in the event of any emergency (e.g. fire alarm), Egis will also gather information through this on the actual location of persons who entered Egis' territory.</p> | <p>Egis deletes the name and card number recorded upon entry upon the expiry of 8 years after the card deposit fee is refunded (Sections 168-169 of the Accounting Act).</p> <p>In the case of legal proceedings initiated in connection with security incidents (for example: civil litigation, criminal proceedings), the data will be kept by Egis until the final termination of the proceedings.</p> <p>The purpose of data retention is to make the documentation of the security incident available during the data retention period, providing the necessary information for official and judicial proceedings initiated as a follow-up to the security incident.</p> <p>The processing of the data of other persons involved in the management of the security incident shall be in accordance with the above data retention periods.</p> |

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| | | | <p>Persons who have access within Egis:</p> <p>In Budapest, the employees of the Security Department (hereinafter: BFO), the competent officers of the property protection service provider. At the Körmend branch of Egis, security technical officer of the Operational Security Group and the head of the Operational Security Group.</p> <p>Egis' security service provider, Future Security Service Kft. (registered seat: 1148 Budapest, Fogarasi út 5., mail@future-security.hu, hereinafter: „security service provider”) acts a data processor.</p> |
| <p>2. Operating a security camera system for the protection of property and for the protection of life and bodily integrity.</p> | <p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest: In a pharmaceutical/chemical</p> | <p>Relevant individuals: Recordings made of the persons entering the Egis headquarters, sites, branch.</p> | <p>If the recording is not used, maximum 30 days from the time when the recording is made, subject to the fact that cameras take pictures based on motion</p> |

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| <p>Data processing related to cameras is governed by a detailed Privacy Notice and rules of procedure: CEO's Order No 18/2016: Operation of the Security Camera System and Drug Technology Camera System. Available at the reception of the Egis premises and in the guard's container.</p> | <p>environment, because of highly flammable and explosive materials and technological processes, the camera surveillance is important for fire, accident and occupational safety and for the protection of the life and physical integrity of persons in the monitored area. For example, in the territory of Egis there are sewage treatment and sedimentation technologies in operation which are also highly dangerous. In the context of the protection of property, Egis has a legitimate interest in recording possible criminal offenses, violations of the rules, damage and other acts that may damage Egis' property, for subsequent enforcement, to assist those involved and to clarify liability.</p> | <p>Scope of data: video recordings recorded by the electronic surveillance system, time of the recording, the conclusions to be drawn from the recordings.</p> <p>Data recorded in the minutes prescribed in CEO's Order No 18/2016: Operation of the Security Camera System and Drug Technology Camera System.</p> | <p>detection, retention time may vary depending on storage capacity, and the recording may be retained for less than 30 days, but will be deleted after 30 days in any case.</p> <p>If the recording is used, until the final and binding completion of the procedure related to the use.</p> <p>Persons who have access within Egis: in order to perform operational tasks, the BFO, the security service provider (specified in point 1) and employees authorized to have access under the Egis internal regulations, CEO's Order No 18/2016 (see Chapter III.).</p> <p>The recordings may be transmitted (made available) by Egis as evidence to, for example, the investigating authority (police) or another authority upon request.</p> <p>Detailed rules for the further use</p> |

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| | | | of the recordings are given in the above-mentioned CEO's Order (Section 6.3). |
| <p>3. Operating a drug technology camera system to ensure the protection of consumers' life, bodily integrity and health.</p> <p>Data processing related to cameras is governed by a detailed Privacy Notice and rules of procedure: CEO's Directive No 18/2016: Operation of the Security Camera System and Drug Technology Camera System. Available at the reception of the Egis premises and in the guard's container.</p> | <p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest: ensuring the protection of consumers' lives, bodily integrity and health in the context of a high-risk technological process or activity carried out in the monitored areas.</p> <p>It is indispensable to have a Drug Technological Camera System in place in order to ensure compliance with applicable occupational safety regulations, to investigate a possible industrial accident, to comply with the rules on product liability of Act V of 2013 on the Civil Code (Sections 6:550-6:559), to detect any inaccurate data that may be generated in the quality assurance system operated by</p> | <p>Videos recorded by the electronic surveillance system, the time of recording and the conclusions that can be drawn from the recordings. Data recorded in the minutes prescribed in CEO's Order No 18/2016: Operation of the Security Camera System and Drug Technology Camera System.</p> | <p>Storage period of video recordings: maximum 180 days from the recording, subject to the fact that cameras take pictures based on motion detection, retention time may vary depending on storage capacity, and the recording may be retained for less than 180 days, but will be deleted after 180 days in any case.</p> <p>This is the period within which Egis can deal with product liability issues to ensure that they are investigated (drug exchange, complaints).</p> <p>Any recordings will confirm or refute the operational and other accompanying documentation generated in the case.</p> <p>Persons who have access within Egis:</p> |

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| | Egis and to comply with national and international pharmaceutical manufacturing regulations. | | see in point 1. |
| <p>4. Conducting breathalyser tests for the protection of property and for the protection of life and bodily integrity.</p> <p>With regard to that checking whether the individual complies with Egis regulations on alcohol consumption. In a pharmaceutical/chemical environment, because of highly flammable and explosive materials and technological processes, anyone entering the Egis area under the influence of alcohol is a particularly dangerous hazard, as such a person can suffer or cause an accident.</p> <p>In the territory of Egis there are sewage treatment and sedimentation technologies in operation which are also highly dangerous, especially for people under the influence of alcohol.</p> | <p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest is the protection of the property of Egis and the protection of the life and bodily integrity of the persons staying in the premises of Egis.</p> <p>It is indispensable to ensure the possibility of alcohol testing by the company, taking into account the nature of the industrial production activities carried out by Egis (manufacture of medicines and other similar products), high level of personal and property safety, product quality, occupational safety and health standards, and investigation of accidents that have occurred.</p> <p>The legitimate interests of Egis are:</p> | <p>Relevant individuals: persons entering the Egis headquarters, sites, branch, witnesses involved in the test and persons carrying out the test.</p> <p>Content of the alcohol testing protocol: name, date of birth, signature of the person subject to a breathalyser test, findings of breathalyser test, names, registration numbers and signatures of assisting witnesses, name and signature of person carrying out the test, name and signature of the inspector and a statement by the inspected person. At the request of the person subject to a breathalyser test, Egis will arrange for a blood test and process the result of the blood test.</p> | <p>Data retention period: 5 years from the issuance of the protocol (under Section 6:22 of Act V of 2013 on the Civil Code civil law claims lapse in 5 years). Then the data processed are deleted. The purpose of data retention is to make the documentation of cases with a positive breathalyser test available during the 5-year retention period, providing necessary information for official proceedings, lawsuits, etc. initiated as a follow-up to positive breathalyser test.</p> <p>In the case of tests with negative results, the duration of data processing is 1 year from the issuance of the protocol. The purpose of data retention is to make the documentation of cases with a negative breathalyser test available during the 1-year retention period, providing necessary information for</p> |

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| <p>In this environment, the inspection of the working external contractors by alcohol probes is also a priority in terms of fire, accident and occupational safety.</p> | <ul style="list-style-type: none"> - the protection of the life and bodily integrity of all persons (including persons under control) and the protection of the security of its property - guaranteeing the operational safety and the safe and continuous nature of Egis' production activities and the security of Egis' assets | | <p>official proceedings, lawsuits, etc. initiated as a follow-up to negative breathalyser test.</p> <p>Persons who have access within Egis:</p> <p>In Budapest, the Security Department and the security service provider, in Körmend, the Operational Security Group, assisting witnesses and specialised institutions that carry out the analysis of the blood alcohol test. In the case of a positive test result, the competent officer of the Legal Department General.</p> |
| <p>5. Baggage and cabinet inspection for the protection of property and for the protection of life and bodily integrity.</p> <p>In a pharmaceutical/chemical environment, because of highly flammable and explosive materials and technological</p> | <p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest is the protection of the property of Egis and the protection of the life and bodily integrity of the persons staying in the premises of Egis.</p> | <p>Relevant individuals: persons entering the Egis headquarters, sites, branch, witness involved in the inspection and persons carrying out the inspection.</p> <p>Scope of data: the name, date of birth and signature of the person subject to the inspection, the</p> | <p>Until the final and binding completion of the legal proceedings initiated as a result of the inspection (for example civil court proceedings, criminal proceedings. In the absence of such proceedings, 5 years from the issuance of the protocol. Under Section 6:22 and Section</p> |

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| <p>processes, anyone entering the Egis area with an instrument capable of causing accident in such an environment is a particularly dangerous hazard, as such a person can suffer or cause an accident. For example, in the territory of Egis there are sewage treatment and sedimentation technologies in operation which are also highly dangerous. In this environment it may be important to inspect the baggage carried by persons entering the premises or the cabinets used by them (that may contain their baggage) from the aspect of fire protection, prevention of accidents and safety at work.</p> | <p>Section 26 (1) b-c) of the Property Protection Act. Accordingly, when guarding any non-public facility of Egis, the security guard is entitled to request any person entering or exiting the premises to present his/her baggage or delivery documents. The security guard is also entitled to request any person being on or exiting the premises to present the contents of his/her baggage, vehicle or freight consignment as set out below.</p> <p>According to Section 28 (1) of Property Protection Act the security guard may demand to see the contents of baggage, a vehicle, or a consignment with a view to discharging his/her contractual obligations regarding security, upon stating the reason and objective of the proposed action, if a) there are reasonable grounds to believe that the person is carrying on him/her any article obtained by a</p> | <p>findings of the inspection, the action taken based on the findings of the inspection, any comment(s) of the person concerned on the inspection and the action taken as a result, the name, registration number and signature of the assisting witness, the name of the inspector, his/her position, the name of the organizational unit in which he/she is employed and his/her signature, as well as the place and date of the protocol taken (including the conclusion therein).</p> | <p>6:533 (1) of the Civil Code claims lapse in 5 years. The rules on limitation are applicable to compensation with the deviation that in the case of damage caused by a criminal offense, the claim will not expire after 5 years until the criminal offense ceases to be punishable. Then the data processed are deleted. The purpose of data retention is to make the documentation of the inspection available during the data retention period, providing necessary information for official proceedings, lawsuits, etc. initiated as a follow-up to the inspection (if any).</p> <p>In the case of inspections with negative results, the duration of data processing is 1 year from the issuance of the protocol. The purpose of data retention is to make the documentation of cases with a negative result available during the 1-year retention period, providing necessary information for official</p> |

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| | <p>criminal act or misdemeanour and that article falls within the security guard's scope of contractual liability for safeguarding; b) the person fails to surrender this article when so instructed; and c) it is necessary for the prevention or stopping of the illegal conduct.</p> <p>According to Section 25 (2) of Property Protection Act in case of exercising the above rights, out of the means available for achieving the purpose, the least injury to personal freedom and personal rights shall be chosen.</p> | | <p>proceedings, lawsuits, etc. initiated as a follow-up to the cases with a negative result.</p> <p>The processing of the data of the assisting witness recorded in the protocol is subject to the above retention periods.</p> <p>Persons who have access within Egis:</p> <p>In the Budapest premises of Egis, the Security Department General, the Operational Safety Group at its branch in Körmend, and at each place the competent officer of the security service provider, and if an inspection ends with a positive result (i.e. if there is a strong suspicion that the person in question keeps a thing with him/her that originates from a criminal offense or misdemeanour, but is the property of Egis or keeps a thing with him/her which endangers or threatens the life or physical integrity of others) a</p> |

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| | | | <p>competent member of the Legal Department General.</p> <p>The property protection service provider acts as Egis' data processor (indicated in point 1).</p> |
| <p>6. Recording the data of van and truck drivers entering the Egis sites and branch for freight transport.</p> | <p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Section 26 (1) a) of the Property Protection Act. Accordingly, when guarding any non-public facility of Egis, the security guard is entitled to request any person entering or exiting the premises to verify his/her identity, to give the purpose of his/her entry or stay and verify his/her authorisation.</p> <p>Legitimate interest: it is necessary to record the data of carriers with regard to the value of a shipment in the event of the protection of the property of Egis and transportation of highly valuable shipments of medicinal</p> | <p>Relevant individuals: data of drivers entering the Egis headquarters, sites, branch employed by a company that carries out freight transport for Egis on the basis of an agreement.</p> <p>Scope of data: name of the driver and the type and number of his/her identification document.</p> | <p>1 year from the recording of the data.</p> <p>In the case of a crime that can be related to transportation, the period is usually 1 year, during which the investigating authority may request information from Egis.</p> <p>Persons who have access within Egis:</p> <p>In the Budapest premises of Egis the employees of the Security Department General, the competent officers of the security service provider, at the Körmend branch of Egis, the Operational Security Group, and</p> |

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| | products, pharmaceutical raw materials. | | at each place the competent staff member of the security service provider. |