

(“Notice”)

– on data processing in relation to COVID-19 epidemic situation –

Effective from 27.03.2020 until withdrawn

Last update: 06.09.2021

Purpose of data processing	Legal basis of data processing	Scope of processed data	Data retention period, access rights, recipients of data transfers
<p>1. Data processing related to the arrival of foreign persons to Hungary for business purpose, so Egis can prepare the necessary documentation required by law in accordance with the current epidemiological situation (e.g. issuing a declaration for business travel).</p> <p>For more information: http://www.police.hu/en/content/information-on-general-rules-of-border-crossing</p>	<p>The legitimate interest of Egis under Article 6 (1) (f) of the GDPR is to be able to assist its foreign partners by issuing the necessary documents required by law for business travel (thus the foreign partner can fulfil the contractual service or exercise other rights and obligations requested by Egis e.g., provide service, conduct audit, maintain business relations).</p> <p>As further authorization, Article 9 (2) of Government Decree 408/2020 (30 August) on <i>Travel restrictions during epidemiological situation</i> (no official translation) on the basis that foreign persons arriving from abroad must prove the fact of their business travel in advance.</p>	<p>Scope of relevant individuals: Foreign persons entering to Egis territory (<i>excluding employees of Egis, employees placed to Egis by agencies, pupils and students involved in the provision of services to Egis under a contract concluded with a school association, and persons employed under a student contract, as well as natural persons engaged by Egis – the relevant internal data processing notice of Egis applies to these persons</i>).</p> <p>Scope of processed data: Name, purpose, date and duration of the business travel, whether it is necessary to issue a document by Egis for business travel.</p> <p>Egis does not process data related to immunity (to COVID – 19 virus), please do not share such documentation with us!</p>	<p>Data retention period: The data requested through online form will be processed by Egis until it can assist its partners required by the Government Decree referred to in the legal basis section, at the latest data older than 6 months will be destroyed in every 6 months.</p> <p>Persons authorized to access: To the completed forms within Egis has access to the staff of the Corporate Culture and Internal Communication Division and the HR Employee Services Department.</p>

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<p>2. Recording data processing in relation to measurement of body temperature in the course of entry to the territory of Egis.</p> <p>The purpose of the measurement is (i) to prevent the development of a possible coronavirus cluster (ii) to ensure business continuity.</p> <p>To protect against the coronavirus, Egis orders a body temperature measurement before entering Egis sites (as a so-called “shell protection” measure). Only a person whose body temperature is below 37.5 °C, may enter the sites of Egis. Body temperature measurements are supported by the staff of the Security Service before entry through revolving gates or passing through barrier gates.</p> <p>You will immediately be informed of your body temperature.</p> <p>If your body temperature is below 37.5 °C, you can enter the territory of Egis, no measurement documentation will be made.</p> <p>If your body temperature is 37.5 °C or above, two control measurements will be taken. If the result of repeated measurements is 37.5 °C or</p>	<p>The legal basis of processing of personal data other than health data: Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>The primary interest of Egis is to provide a non-hazardous work environment and safe working conditions for its employees.</p> <p>In the current epidemiological situation, it is extremely important to ensure the continuity of business and pharmaceutical production while protecting the health of colleagues. Egis therefore has a legitimate interest in checking persons entering its sites prior to entry for possible infection with the coronavirus.</p>	<p>Scope of relevant individuals: Persons entering the territory of Egis (<i>excluding employees of Egis, employees placed to Egis by agencies, pupils and students involved in the provision of services to Egis under a contract concluded with a school association, and persons employed under a student contract, as well as natural persons engaged by Egis – the relevant internal data processing notice of Egis applies to these persons</i>).</p> <p>The data recorded in the report on possible infection revealed in the course of the measurement of body temperature (i.e. the fact of body temperature above the value determined by Egis or the fact of refusal to have body temperature measured) (data necessary to establish or to identify the above facts). The reason for recording the report is that Egis, as the Customer (service user), can prove that why it does not allow performance undertaken by the contractual partner (in its territory).</p> <p>In the case of relevant individuals not affected by the above, no report will be issued, no data will be recorded.</p> <p>The fact of being subject to any</p>	<p>Data retention period: Egis shall keep the data only if possibility of infection can be inferred from them, until the competent authorities confirm the end of the new type of coronavirus epidemic or the risk of infection with the new type of coronavirus. (Criteria for determining the date: as long as the risk of infection may persist and Egis as employer must continue to take the necessary and proportionate measures to protect the health of employees).</p> <p>In each case Egis will consider whether further data retention is justified in the event that the data is necessary for Egis in legal proceedings. For example, you refuse to have your body temperature taken or your exposure can be established from the measurement of body temperature. In this case the data retention period: 5 years in civil law matters (limitation period set out in Section 6:22 (1) of the Civil Code), or in the case of enforcement of a claim, the final and conclusive termination of the proceedings.</p> <p>Persons authorized to access: The above data is accessed within the Egis by the staff of the Security Department General, who decide on the basis of the body temperature measurement whether the relevant individual may enter the territory of Egis. The refusal of entry and the reason for it will be notified to your</p>

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<p>higher, you will not be permitted to enter the territory of Egis.</p> <p>The prohibition to enter applies to one business day, so you may enter Egis territory on the next business day if you comply with the provisions of this Notice, unless otherwise advised by a physician or instructed by the management.</p>		<p>further action taken on the basis of the above (e.g. refusal of entry, possible civil consequences – if refusal of your entry affects the service provided to the Egis).</p>	<p>host department, which may, as necessary, notify your employer or the company employing you – e.g. replacement must be provided.</p> <p>If your body temperature is 37.5 °C or above after the control measurements, the staff of the Security Service will issue a report, a copy of which will be handed over to you, and the staff of the Security Service will keep it for later proof for the action.</p> <p>If an action is taken (e.g. due to a refusal to have body temperature taken or to provide data), the competent staff of the host department and the Legal Department General may also have access to the data related to the action.</p> <p>In the measurement of body temperature and completion, collection and forwarding of reports, Egis is assisted by Future Security Zrt. (1148 Budapest, Fogarasi út 5., mail@future-security.hu) as data processor (Security Service).</p> <p>The management of Egis and the ECOT (Egis Coronavirus Operational Team) is also entitled to access the data (without access to personal data) and the records kept on it, as well as the findings that can be deduced from them (e.g. how many persons may be infected) in order to be able to initiate further action.</p>

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			Egis may, if necessary, inform the epidemiological or other authority or the healthcare institution acting in relation to the coronavirus that it processes data for the purpose specified in this Notice. At the request of the epidemiological or other authority or the healthcare institution or staff acting in relation to the coronavirus Egis may then provide personal health data to the authority or healthcare institution.

We would like to inform you that the content of this Notice may be amended or supplemented in view of changes in the epidemiological situation.

The version of this Notice effective from time to time is available at: <https://int.egis.health/privacy-notice-on-data-processing-in-relation-to-covid--epidemic>
For further information on your data protection rights, please visit <https://hu.egis.health/gdpr>. Egis expressly draws your attention to your right to object to data processing specified in this Notice at any time. If you object to the processing of your personal data, Egis will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. If you exercise your right to object to the data processing, Egis will examine whether the objection is well-founded. If it is not substantiated, Egis will not be able to grant you entry until you make the required statement and your body temperature does not exceed the limit.

If you have any questions related to data processing, please feel free to contact us at gdpr@egis.hu.