

PRIVACY POLICY

(For Gép és Gépelem Kft. employees)

Effective from: 25 November 2025

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1. Data of the Data Controller

Name of data controller: **Gép és Gépelem Kft.**

Headquarters: 7100 Szekszárd, Korsófolde u. 3.

Company registration number: 17-09-001182

Phone: +36 20 809 9151

Email: office@dussergroup.hu

Website: www.dussergroup.hu

Person responsible for data processing activities: Imre Koloszar and Laszlo Eberling managing directors

2. Purpose of the factsheet

The purpose of this Privacy Policy is to provide data subjects with information about the processing of their personal data in an easily understandable and transparent manner.

During the processing of employee data, we act in accordance with the relevant legislation (data protection, labor, accounting, etc.).

We collect, store, transfer personal (including sensitive) data to third parties, as well as any other data processing activities in such a way that the data cannot be accessed by unauthorized person(s).

In the conduct of our data processing activities, we pay special attention to the relevant European Union and domestic legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. "On the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of Such Data, and on the Repeal of Directive 95/46/EC (General Data Protection Regulation - GDPR)" and the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Privacy Act) in Hungary.

3. General purpose of data processing

We process the data of our employees primarily for the purpose of fulfilling the employment relationship, including the fulfilment of administrative obligations related to the establishment and maintenance of the employment relationship, the payment of wages and other benefits, the organization of on-the-job trainings, the procedure related to accidents at work, etc., in accordance with the relevant legal provisions.

In the case of data processed on the basis of consent (e.g. photography, organisation of events), the employee is free to decide whether or not to consent to data processing.

4. Data Processed

4.1 Applying for admission, interview

Data subjects: Persons applying for a position at Gép és Gépelem Kft.

Purpose of data processing: Collection and management of data necessary for the establishment of the employment relationship (identification, contact), conducting the recruitment procedure.

Activity	Data type	Legal basis	Target	Retention period
Apply for admission	Information provided in the CV	contribution	conducting the recruitment procedure (identification, decision on compliance with the conditions)	Until the withdrawal of consent/3rd month after rejection of the applicant/withdrawal or 30 days after
Interview	name	contribution	conducting the recruitment procedure (identification, decision on compliance with the conditions)	Until the withdrawal of consent/3rd month after rejection of the applicant/withdrawal or 30 days after
	Education			
	photo			
	Other information provided voluntarily (hobbies, health data)			

The process of data processing:

We will collect the applicant's personal data in order to conduct the recruitment process. The data is used to prepare the employment contract and stored electronically.

The provision of data is mandatory for the evaluation of the application. If you fail to do so, the admission procedure cannot be conducted.

4.2 Establishment and maintenance of employment – conclusion of contracts

Affected: Employees employed by Gép és Gépelem Kft.

Purpose of data processing: Collection and management of data necessary for the establishment and maintenance of the employment relationship and the performance of work tasks.

Activity	Data type	Legal basis	Target	Retention period
Establishment and maintenance of employment	name	Compliance with a legal obligation	Establishment of employment relationship, conclusion of contracts (identification, contact, employment reporting, tax and social security administration)	Unlimited time
	Date of birth			
	birthplace			
	mother's name			
	permanent address			
	citizenship			
	Tax identification number			
	ID number			
	address card number			
	Social security number			
	signature			

The process of data processing:

We ask for the employee's personal data in order to conclude the employment contract. We use the data to prepare the employment contract and to perform activities related to maintaining the employment relationship during the employment relationship.

Employment contracts and job descriptions are also stored on paper and stored electronically. CVs, copies of certificates and other related documents are stored electronically.

The provision of data is mandatory in order to conclude a contract under the legislation on the establishment of an employment relationship. In case of non-compliance, the contract will not be concluded.

4.3 Establishment and maintenance of an employment relationship – tax and social security administration, employment notification

Affected: Employees employed by Gép és Gépelem Kft.

Purpose of data processing: Collection and management of data necessary for the establishment of the employment relationship and the performance of work tasks, tax and social security administration, employment reporting

Activity	Data type	Legal basis	Target	Retention period
Establishment and maintenance of employment	name	Fulfilment of a legal obligation	tax and social security administration, labour registration	Unlimited time
	citizenship			
	Tax identification number			
	Social security number			
	Skills			

	Name of the institution			
	Document number			
	Document Issue Date			

The process of data processing:

We use the data during the employment relationship to carry out activities related to maintaining the employment relationship. The data is stored both on paper and electronically. The provision of data is mandatory in order to conclude a contract under the legislation on the establishment of an employment relationship. In case of non-compliance, the contract will not be concluded.

4.4 Establishment and maintenance of an employment relationship – transfer of wages

Affected: Employees employed by Gép és Gépelem Kft.

Purpose of data processing: Collection and management of data necessary for the establishment of the employment relationship and the performance of work tasks, transfer of wages

Activity	Data type	Legal basis	Target	Retention period
Establishment and maintenance of employment	Bank account number	Fulfilment of a legal obligation	Salary transfer	30 days after the termination of employment

The process of data processing:

We use the data during the employment relationship to perform activities related to the maintenance of the employment relationship and to transfer wages. The data is stored both on paper and electronically.

4.5 Keeping copies of certificates

Affected: Employees employed by Gép és Gépelem Kft.

Purpose of data processing: Preservation of copies of certificates, certification of professional qualifications

Activity	Data type	Legal basis	Target	Retention period
Keeping copies of certificates	Personal data displayed in the certificate	Fulfilment of a legal obligation	Proof of professional qualifications (e.g. in the case of tenders)	30 days after the termination of employment/end of the application maintenance period

The process of data processing:

We use the data during the employment relationship to carry out activities related to the maintenance of the employment relationship, to certify professional qualifications (e.g. in the case of applications). The data is stored both on paper and electronically. It is a requirement for the organization to be able to prove the qualifications and competence of its employees. To this end, it shall keep a record of the qualifications and diplomas of the staff members certifying their qualifications and professional competence obtained in the school system and outside the school system.

4.6 Termination of employment

Affected: Employees employed by Gép és Gépelem Kft.

Purpose of data processing: Termination or termination of employment

Activity	Data type	Legal basis	Target	Retention period
Termination of employment	name, e-mail address	Fulfilment of a legal obligation	Termination of employment, dismissal	Unlimited time

The process of data processing:

We use the data to perform activities related to the termination of employment and to transfer wages. The data is stored both on paper and electronically.

4.7 Occupational and fire safety training

Affected: Employees employed by Gép és Gépelem Kft.

Purpose of data processing: Organization of occupational and fire safety training for employees, implementation of trainings.

Activity	Data type	Legal basis	Target	Retention period
Occupational safety training	name	Compliance with a legal obligation	Occupational safety training for employees	Minimum 5 years after termination of employment
	signature			
	job			
Fire safety training	name	Compliance with a legal obligation	Fire safety training for employees	Minimum 5 years after termination of employment
	signature			

The process of data processing:

During the organization of trainings, we indicate the personal data of the employees participating in the trainings in the training logs, who certify their participation with their signatures. These documents are kept in paper form.

The provision of data is mandatory under the legislation on occupational and fire safety. If you fail to do so, the employment relationship cannot be maintained.

During the inspection, the data will be forwarded to the Occupational Safety and Health Authority and the Disaster Management Authority.

4.8 Administration related to workplace accidents

Affected: Employees employed by Gép és Gépelem Kft. who suffered an accident at work.

Purpose of data processing: administration related to workplace accidents, social security procedure.

Activity	Data type	Legal basis	Target	Retention period
Accident at work	name	Compliance with a legal obligation	Social Security Procedure	7 years
	TAJ			
	Birthplace			
	Date of birth			
	residence			

The process of data processing:

A report is made of the accident at work. This, as well as other forms required for the social security procedure, are kept in the employee's personal file. The provision of data is mandatory based on the relevant legislation. If you fail to do so, you cannot claim social security benefits.

In the event of an inspection, the data will be forwarded to the authority performing the labour inspection.

4.9 Organization of trainings

Affected: Employees employed by Gép és Gépelem Kft.

Purpose of data processing: organization of training

Activity	Data type	Legal basis	Target	Retention period
Organization of employee training	name	Contribution	Training of employees	7 years
	signature			

The process of data processing:

The provision of data is essential for employees in the case of mandatory trainings. In the case of non-mandatory training, consent to data processing may be refused, but in this case, the employee may not participate in the training.

The documents related to the trainings are kept both on paper and electronically.

4.10 Declarations and certificates related to taxation and benefits

Affected persons: Employees, spouse(s) of employees employed by Gép és Gépelem Kft.

Purpose of data processing: filling in and submitting the forms required to apply for the discount.

Activity	Data type	Legal basis	Target	Retention period
Family Allowance Statement	name	Compliance with a legal obligation	Claiming family tax allowance	5 + 1 years
	Tax identification number			
	signature			
	spouse's name			
	spouse's tax identification number			
	the name of the spouse's employer			
	Spouse's signature			
	Name of child(ren)			
	Date of birth of the child(ren)			
	Tax identification number of the child(ren)			

The process of data processing:

The statements are filled in by the employee and then handed over by Gép és Gépelem Kft. to 4Sales Systems Kft., which provides payroll accounting services, which processes the data during payroll accounting. The documents will be attached to the employee's personal file.

The provision of data is mandatory under applicable law. In case of non-compliance, the discount cannot be claimed.

The data will be transmitted to the competent authority.

4.11 Taking and using photo and video recordings

Affected: Employees employed by Gép és Gépelem Kft.

Purpose of data processing: To make and use photographs and videos.

Activity	Data type	Legal basis	Target	Retention period
Taking and using photo and video recordings	Effigy	contribution	Corporate identity	until the withdrawal of consent

The process of data processing:

Employees can be recorded for a variety of reasons. In all cases, the employee's consent is the legal basis for this data processing. Refusal of consent does not have any adverse consequences for the

employee. Photos are primarily stored in electronic form, but in some cases also on paper. The employee may request the deletion of recordings concerning him or her at any time.

Pictures of the family members of the employees can also be taken at family events. In such cases, we also ask for the consent of relatives (in the case of children, the legal representative).

4.1 Other data processing

Data subjects: employees of Gép és Gépelem Kft. and, in some cases, their relatives.

Purpose of data processing: Organization of joint programs

Activity	Data type	Legal basis	Target	Retention period
Create a common mailing list	Name and email address	contribution	Organization of programs	until the withdrawal of consent, but no later than the termination of the employment relationship

The process of data processing:

The data is stored electronically, on our own internal server. In all cases, the employee's consent is the legal basis for this data processing. Refusal of consent does not have any adverse consequences for the employee.

5. Data security

We ensure the security of the personal data we process through technical and organizational measures and the establishment of procedures.

Appropriate measures are taken to protect the data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, as well as inaccessibility due to changes in the technology used.

Personal data is only accessible to those of our employees who need to know it in order to perform their duties.

To keep your data safe

- During the design and operation of the IT system, we assess and take into account the potential risks, striving to reduce them continuously
- monitor emerging threats and vulnerabilities (such as computer viruses, computer intrusions, denial-of-service attacks, etc.) so that we can take timely measures to avoid and eliminate them
- We protect IT devices and information handled on paper against unauthorized physical access and environmental influences (e.g. water, fire, electrical surgeries)
- By monitoring our IT system, we ensure the detection of possible problems and events
- We take great care to train our employees in information security and raise awareness
- Reliability is a fundamental aspect when selecting service providers participating in operation

6. Transmission and transfer of data

The personal data of the employees are only transferred to third parties in connection with the performance of the employment relationship, such as payroll and accounting purposes, and in some

cases we forward them to the organizations and training companies participating in the tenders. In addition, documents containing the personal data of employees are only handed over during inspections (e.g. labour inspections, NAV inspections) on the basis of a legal obligation, upon request from the authorities.

During the audit of the management systems operated by our company, various records may be checked, but in these cases the auditor does not check the personal data, but only the existence of the records.

For our invoicing and labour (payroll) activities, our company uses a data processor, as the accounting is done by an external contractor. Part of our contract with him is the agreement on data processing, which ensures that he processes the data with the same care, in compliance with the relevant laws, and only in accordance with our instructions.

Information on the transfer of data is detailed in Section 4.

7. Rights of data subjects

All data subjects have the right to:

- He or she should be *informed* of the data processing concerning him or her before it is started.
- *Access* all information related to the data processing concerning him
- Request *correction* of incorrect, inaccurate or incomplete data
- Request deletion (*forgetting*) of your personal data
- Request *restriction of* processing
- *Object* to the use of your data in certain cases, e.g. for marketing purposes
- *Legal remedy* against data processing

These rights may be exercised by the data subjects using the contact details provided below, in writing or in person by prior arrangement. We try to respond to all inquiries as soon as possible, but no later than 15 working days.

Contact details for the exercise of rights:

- By post: 7100 Szekszárd, Korsófölde u. 3.
- By email: office@dussergroup.hu
- In person: by phone at +36 20 809 9151 as agreed.

We are unable to disclose personal information over the phone, given that we cannot identify the caller.

In the event of a violation of their rights, those concerned should primarily contact us, and we will always try to cooperate in order to resolve the situation.

If the data subjects need further assistance in enforcing their rights, they can contact the National Authority for Data Protection and Freedom of Information.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

www: <http://www.naih.hu>

E-mail: ugyfelszolgalat@naih.hu