

PRIVACY POLICY

date of the last update: 1 August 2022

I. GENERAL INFORMATION, THE CONTROLLER

1.1. Identity and activities of the controller

With respect to the processing of data specified in this Information Notice („**Notice**”), the controller is **Paks II. Atomic Power Plant Limited Liability Company** (registered office: 7030 Paks, Gagarin utca 1. 3. floor. 302/B.; company registration number: 17-10-001282; tax number: 24086954-2-17; hereinafter referred to as „**Paks II. Ltd.** „, or „**Data Controller**”).

The Paks II. is a company registered in Hungary.

1.2. Governing legislation

Paks II Ltd. conducts its activities in compliance with European Union and Hungarian legislation.

The data processing is primarily governed by the General Data Protection Regulation of the European Union [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 repealing Regulation (EC) No 95/46/EC; hereinafter „**GDPR**”] and, with the exceptions set out therein, Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter „**Infotv.**”).

In addition, the relevant legislation provides in particular:

- Act I of 2012 on the Labour Code;
- Act LXXX of 1997 on the entitlement to social security benefits and private pensions and on the coverage of these services;
- Act LXXXI of 1997 on Social Insurance Pension Benefits;
- Act XCIII of 1993 on Occupational Safety and Health;
- Act CL of 2017 on the Rules of Taxation.
- Act CXVII of 1995 on Personal Income Tax
- Act CXXV of 2003 on equal treatment and the promotion of equal opportunities
- Act CXXII of 2009 on the more economical operation of publicly owned companies
- Act CXXXIII of 2005 on the Rules of Personal and Property Protection and Private Investigation
- Act CXXV of 1995 on National Security Services
- Act CXVI of 1996 on Nuclear Energy
- Act XCIII of 1993 on Occupational Safety and Health
- Act XXXI of 1996 on Fire Protection, Technical Rescue and Fire Brigades
- Act V of 2013 on the Civil Code
- Government Decree No 118/2011 (VII. 11.) on the nuclear safety requirements for nuclear installations and the related activities of the authorities

The current text of the GDPR is available at <http://eur-lex.europa.eu/legal-content/HU/TXT/?uri=CELEX:32016R0679> and the current text of other legislation is available at <http://net.jogtar.hu/>.

1.3. Scope of the Prospectus, the data subject

Personal data under the GDPR means any information relating to an identified or identifiable natural person („**data subject**”, after the employment relationship has been established, „**employee**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Therefore, data that do not relate to natural persons (e.g. company data) or that cannot be linked to natural persons (e.g. statistical data, data that are anonymised) are excluded from the scope of this Notice.

This Notice applies only to the data processing of Paks II Ltd.

II. PRINCIPLES, PURPOSES, LEGAL BASIS FOR PROCESSING

2.1. Principles of data management

Paks II Ltd. processes the data lawfully, fairly and in a transparent manner for the data subject. Paks II Ltd. shall endeavour to ensure that the data it processes are accurate and up-to-date. Paks II Ltd. shall ensure the rights of the data subject and shall take the necessary measures to ensure that the processing of data is lawful at all stages.

2.2. Purpose of data processing i

are defined in the chapter „Individual processing”, separately for each processing.

2.3. Possible legal basis for processing i

Taking into account that Paks II Ltd. processes personal data for several purposes, the legal basis for the processing may also be different. The main legal grounds are set out below, with the specific legal grounds relating to each processing operation being set out in the section „Individual processing operations”.

Consent of the data subject (Article 6(1)(a) GDPR)

The legal basis for processing is in some cases the consent of the data subject. The data subject gives his or her consent by contacting Paks II Ltd. and initiating the establishment of a legal relationship, for example by starting the selection process or participating in an event organised by Paks II Ltd. Consent is voluntary in all cases, but failure to give consent may result in the legal relationship between the data subject and Paks II Ltd not being established. In any case, Paks II Ltd. will inform the data subject about the data processing.

Contract between Paks II Ltd. and the data subject (Article 6 (1) (b) GDPR)

If the data subject enters into a contract with Paks II Ltd, he or she shall provide the data necessary for the performance of the contract in the contract and on the related forms. The data are then processed for the purposes of performing the contract and taking the steps initiated by the data subject. In addition, in certain cases, processing is also necessary during the employment relationship in order to maintain the contract.

Compliance with a legal obligation (Article 6(1)(c) GDPR)

In certain cases, the legal basis for processing is a legal provision. The main legal provisions that also provide for data processing are set out in the section „Governing law”.

The legitimate interests of the controller or a third party (Article 6(1)(f) GDPR)

If the data processing is necessary for the enforcement of the legitimate interests of the data controller or a third party, Paks II Ltd. will use the data for the purpose of enforcing these interests.

2.4. Processing based on the legitimate interests of Paks II Ltd. as data controller

Paks II Ltd. is engaged in economic activities. The establishment and maintenance of the employment relationship serves this economic activity. As an economic company, Paks II Ltd. has the objective and fundamental interest to be successful in its activities, and this can only be ensured if Paks II Ltd. is managed and controlled effectively. The purpose of the data management of Paks II Ltd. is therefore in the interest of Paks II Ltd. as the data controller, to ensure the efficiency and effectiveness of Paks II Ltd.

In addition to the above, the activity of Paks II Ltd. is specific: the construction and operation of a nuclear power plant. This activity is regulated by international rules, legislation and official regulations, and is subject to strict conditions. The activity involves a high level of risk, and it is therefore essential to achieve and maintain a high level of safety, which is also a consequence of the responsibility of the nuclear licensee. The activities of Paks II Ltd. are of paramount importance for the national economy and national security.

Based on the above, in the case of data processing based on the legitimate interests of Paks II. Ltd. as data controller, Paks II. Ltd.'s interest is to operate efficiently and effectively, to comply with the law and to operate in accordance with the applicable legislation, and to ensure the highest level of personal, property and operational security. In order to achieve these objectives, it is essential to organise and control work properly and to manage the workforce efficiently and responsibly.

If the legal basis for any processing is in the interest of Paks II Ltd, it will be clearly indicated in the „Individual processing” section of this notice.

Paks II Ltd. processes data only for purposes that are lawful, fair and closely related to the economic activity of Paks II. Ltd.

Ltd. In the case of processing based on the legitimate interests of Paks II Ltd. the purpose of the processing cannot be achieved by any other means, in particular without processing.

In all cases, data processing based on the legitimate interests of Paks II Ltd. are clear and known to the data subjects, i.e. the data subject is aware of all data processing processes.

Data subjects may object to the processing and exercise all their rights under the law.

Paks II Ltd. collects the data primarily from the data subject. Paks II Ltd. only collects data from other sources if the data subject has given his/her consent or if the law expressly authorises the collection of the data.

III. THE INDIVIDUAL PROCESSING

Purpose and brief description of the processing	Scope and list of data processed	Purpose of data processing	Legal basis for processing	Time limits foreseen for the retention/deletion period for each category of data, if any (e.g. in legislation) If not, the time it takes for the data to be needed by the Company in any case.	stakeholders
<p>Data processing related to recruitment, selection</p> <p>(for prospective employees): Paks II Ltd. is continuously selecting new employees for the positions to be filled. Paks II Ltd. publishes job advertisements on online portals and also uses recruitment agencies (consultants). In doing so, Paks II Ltd. will determine the eligibility criteria and the main parameters of the job to be filled. Paks II Ltd. will process the applications received (CVs and other data provided by the applicant) and on this basis will select the person with whom it will enter into a legal relationship. The selection may include a personal interview or an aptitude test.</p>	<p>The data processed are the data provided by the data subject, such as name, contact details (telephone number, e-mail address, home address), CV, data concerning qualifications, education, previous work experience.</p>	<p>Identification of the data subject, contacting and maintaining contact with the data subject; -Discovering the data and circumstances (e.g. education, skills) relevant to the employment relationship;</p>	<p>The legal basis for the processing is the consent of the data subject and the taking of steps by the data subject in order to conclude a contract between the data subject and Paks II.</p>	<p>If the legal relationship is established, the data will be processed by Paks II Ltd. during the legal relationship and for three years thereafter. Relevant legislation: Section 286 (1) of the Labour Code (the limitation period for labour law</p>	<p>Candidates</p>

<p>If the legal relationship between the data subject and Paks II Ltd. is not established and it is obvious that the legal relationship cannot be established in the future, Paks II Ltd. will delete the data without delay.</p> <p>If the legal relationship between the data subject and Paks II Ltd. is not established, but it cannot be excluded that a legal relationship will be established in the future, Paks II Ltd. will inform the data subject thereof. If the data subject does not request the deletion of his/her data, Paks II Ltd. will process the data for a maximum period of one year.</p>		<p>-Check the suitability of the person concerned; -Establishing a legal relationship , drafting and signing the contract establishing the legal relationship.</p>		<p>claims is three years)</p> <p>If a legal relationship is not established, the deletion of the data will be as described in the purpose of processing column, depending on whether a legal relationship can be established at a later stage or excluded.</p>	
<p>(for trainees): during this process, Paks II. Ltd. handles the applications received (CVs, data provided by the applicant), forwards the CVs to the relevant field/s of study according to the qualification indicated in the CV. The department decides on the employment of the student. A personal interview may be conducted to facilitate the selection process. If the legal relationship between the person concerned and Paks II Ltd. is not established and it is obvious that the legal relationship cannot be established in the future, the data concerning the applicant will be deleted by Paks II Ltd. In the context of the employment of trainees, the Company shall enter into Cooperation Agreements with the universities having a legal relationship with the students.</p>	<p>The data processed (in the case of trainees) are the data provided by the data subject, such as name, contact details (phone number, e-mail address, home address), CV, data on qualifications, education, previous work experience.</p> <p>To start the traineeship, you need a student status certificate issued by the educational institution concerned, which contains the following data: name, place of birth, date of birth, mother's name, nationality, address, student identification number.</p> <p>In addition, the student may attach a motivation letter to his/her CV and a certified copy of his/her transcript of records to prove his/her achievements in the course.</p> <p>The Cooperation Agreements concluded for the purpose of employing the student trainee include the following data of the universities and Paks II Ltd. that have a legal relationship with the student: name, registered office, bank account number, institutional ID, statistical number, tax number, company registration number, name of the representative(s), name, address, e-mail address and telephone number of the contact person(s). The annexes to the Cooperation Agreements, which vary from one institution to another, contain the following information in general: name, date and place of birth of the student accepted for the placement, mother's name, bank account number, social security number, address, telephone number, Neptun code, faculty, degree</p>	<p>Identification of the data subject, contacting and maintaining contact with the data subject; -Discovering the data and circumstances (e.g. education, skills) relevant to the employment relationship; -Check the suitability of the person concerned; -Establishing a legal relationship , drafting and signing the contract establishing the legal relationship.</p>	<p>The legal basis for the processing is the consent of the data subject and the taking of steps by the data subject in order to conclude a contract between the data subject and Paks II.</p>	<p>The time limits foreseen for the retention/deletion periods for each category of data also apply to the data on employees for trainees. Given that the Cooperation Agreements are concluded for an indefinite period of time, they are also kept for an indefinite period of time, with the data being deleted after the end of the legal relationship.</p>	<p>students on traineeship</p>

	programme, year of study, type of training (self-financed/grant-aided), level of training, language of training, work schedule, place, duration and date of placement, name of the person responsible for the placement at the higher education institution. title, telephone number, e-mail address.				
(for applicants to the scholarship programme): this includes the processing of data of students applying for the „Nuclear Energy for a Secure Future” scholarship programme (see here: <i>Data processing in the context of the Paks II. Paks II Scholarship Programme</i>).	For the scope of the data processed for the scholarship programme, see here: <i>Data management at Paks II. Study Scholarship Programme of Paks II.</i>	Identification of the data subject, contacting and maintaining contact with the data subject; -Discovering the data and circumstances (e.g. education, skills) relevant to the employment relationship; -Check the suitability of the person concerned; -Establishing a legal relationship , drafting and signing the contract establishing the legal relationship.	The legal basis for the processing is the consent of the data subject and the taking of steps by the data subject in order to conclude a contract between the data subject and Paks II.	The data processing period for the Scholarship Programme is: until the end of the evaluation process or, in case of a positive evaluation, until the end of the legal relationship with the Scholarship provider within the framework of the Study Scholarship Programme or, in case of employment following the Scholarship Programme, until the duration of the employment relationship.	students and scholarship holders
Conclusion of the employment contract, recruitment of the person concerned If, as a result of the selection process, an employment relationship is established between Paks II. Ltd. and the person concerned, Paks II. Ltd. will prepare the conclusion of the employment contract and the establishment of the employment relationship. During this process, the data subject shall provide personal data, present the necessary documents, sign the employment contract and the related declarations on a form provided by Paks II Ltd. In the course of data processing, the data are recorded by Paks II Ltd. in the IT register, and the documents submitted on paper are also recorded in the register. As part of data management, Paks II Ltd. will make the legally required notifications (tax authority, social security). On the part of Paks II. Ltd., the data may only be accessed by individual employees of the Human Resources Directorate and the General Security Department to the extent necessary for the performance of their duties.	Documents required for employment: proof of previous employment, income statement, „social security record book”, certificate of education.	-Establishing a legal relationship , drafting and signing the contract establishing the legal relationship; -Determining and paying the salary, other remuneration and benefits to which the person concerned is entitled; -Exercise of rights and obligations arising from the legal relationship between the parties; -Fulfilling obligations imposed by law (e.g. providing data to tax authorities, social security bodies).	The legal basis for the processing is partly the performance of a contract between the data subject and Paks II Ltd. and the law, in particular the legislation on social security and tax liability.	The data will be processed by Paks II. Ltd. for three years after the termination of the employment relationship (Section 286 (1) of the Labour Code (the labour law claim expires after three years). Paks II Ltd. also processes the data necessary to establish the entitlement to social security pension benefits, taking into account that the data subject may need to prove the entitlement to pension benefits. These data will be deleted by Paks II Ltd. if the data subject so requests - in this case, no subsequent provision of data is possible. The Tbny. 43 (2) of the Social Security Act, the employee may prove his disagreement with the length of service calculated by the social security administration only by means of an original document (certificate) or certified copy of the same date issued by the former employer/employer or by means of a certificate issued on the basis of the original records of the employer.	third parties (future employees receiving offers from Paks II Ltd.)

				<p>Tbny. The insured or formerly insured person obliged to keep records pursuant to § 99/A of the Act on the Insurance of Social Security shall keep the employment documents containing data on the length of service or earnings taken into account in the determination of the pension for five years after the insured or formerly insured person reaches the retirement age.</p> <p>This includes the documents needed to establish the amount of earnings and length of service: documents proving payment of contributory wages and sick pay/benefits/benefits (certificate of contributory income and deducted contributions, leaving documents, employment certificate, declaration and declaration forms).</p>	
The process detailed above also applies to the employment of trainees .	In the case of trainees , the data described in this point (proof of previous employment, data sheet on income paid, „social security record book“, certificate of education) do not need to be processed for the conclusion of the employment contract, only the data already detailed above are processed.	<p>Establishing a legal relationship, drafting and signing the contract establishing the legal relationship;</p> <p>-Determining and paying the salary, other remuneration and benefits to which the person concerned is entitled;</p> <p>-Exercise of rights and obligations arising from the legal relationship between the parties;</p> <p>-Fulfilling obligations imposed by law (e.g. providing data to tax authorities, social security bodies).</p>	The legal basis for the processing is partly the performance of a contract between the data subject and Paks II Ltd. and the law, in particular the legislation on social security and tax liability.	The rules applicable to employees apply.	student trainees (the provisions applicable to employees apply to them)
<p>Data processing by Paks II. Ltd. Study Scholarship Programme</p> <p>The use of data for the process of concluding the contract for participation in the scholarship programme is as indicated here. Paks II Paks II Study Scholarship Programme. If an employment relationship is established between Paks II. Ltd. and the scholarship holder after the end of the scholarship programme, as stipulated in the relevant contract, the provisions applicable to employees shall apply to the legal relationship.</p>	The processed data are the data provided by the data subject, such as name, date and place of birth, year, specialisation, average academic record at the end of the previous academic year, bank account number, school attendance certificate, student status certificate, Neptun code for students, student ID number, year of enrolment, BSc degree result (for MSc students), and the data necessary for contacting the data subject (telephone number, e-mail address,	Managing the applications of students applying for the Scholarship Programme, initiating the evaluation process, informing the parties concerned of the outcome of the evaluation, liaising with the applicants.	The legal basis for the processing is the consent of the data subject and the taking of steps by the data subject in order to conclude a contract between the data subject and Paks II.	Until the end of the evaluation process or, in the case of a successful evaluation, until the end of the legal relationship with the Scholarship provider within the framework of the Study Scholarship Programme, and if an employment relationship is established between Paks II. Ltd. and the scholarship holder after the end of the scholarship programme, then in accordance with the provisions applicable to such a relationship.	third parties (applicants for a scholarship programme)

	<p>notification address). In addition, the data contained in the documents submitted by the person concerned as part of the application file (letters of recommendation, proof of competition results, work in a professional organisation, proof of language skills, and for students: participation in a professional college, demonstrator activities, other proof).</p> <p>For students in the ESI: student's name: place and date of birth, mother's name, address, OM number, tax identification number, bank account number, scholarship amount, how it is paid.</p> <p>For university students (BSc and MSc): student's name, date and place of birth, mother's name, address, tax identification number, Neptun code, bank account number, scholarship amount, how the scholarship is paid.</p>				
<p>Data processing related to training, education</p> <p>Paks II Ltd. shall organise training courses in which the employees, agents and subcontractors of each contracting partner who perform work for Paks II Ltd. of the type for which such training is required may or must participate. In any case, Paks II Ltd shall inform its partners of the training required or recommended and shall inform the person concerned thereof either directly or through the partner. Participation is voluntary, however, if the training is necessary for the performance of an activity, refusal to participate may result in the person concerned not being allowed to work for Paks II.</p> <p>If the person concerned takes part in the training, Paks II Ltd. may provide the training organisation with the name, job title and other data necessary for the training. The data shall be used by the training organiser solely in connection with the training (assignment, documentation of participation, reporting, certification of qualifications). Paks II. Ltd. handles the data on the participation of the person concerned, the qualification obtained in the training (if any).</p>	<p>Data relating to qualifications, education and training: the Company processes data relating to the educational qualifications and other professional qualifications of the data subject, as well as data relating to training courses organised by the Company (participation of the data subject, training results). The data subject's personal data, contact details, the name of the partner employing the data subject, training details.</p> <p>In addition, a number of educational institutions have an obligation to report to the National Statistical Data Collection Programme - Central Statistical Office, which requires the following to be reported on the OSAP 1665 system form:</p> <ul style="list-style-type: none"> - Date of birth of the trainee - Highest level of education - Gender - Postal code of address 	<ul style="list-style-type: none"> -Preparation, conclusion and performance of contracts concluded or planned to be concluded by Paks II; -Ensuring the operation of Paks II Ltd; - Maintaining the security of persons, property and operations. 	<p>Taking into account that participation is voluntary, the legal basis for data processing is the consent of the data subject and the performance of the contract concluded between the data subject (or the contractor employing the data subject) and Paks II.</p>	<p>The duration of data processing is linked to its purpose, in connection with the need for Paks II Ltd to be aware of whether the person concerned already has the rights deriving from that education. There are examinations (e.g. entry training) for which it is necessary to know whether or not the person has passed them, for the duration of the legal relationship. Furthermore, the data are processed for the duration of the cooperation with the partner (the duration of the contract).</p>	<p>third parties (partners)</p>

	<ul style="list-style-type: none"> - Employment status - Date of enrolment - Have you completed your training? - Did you pass the exam? - What qualification did you obtain? - The cost of the trainee's participation fee 				
<p>Data processing in relation to psychological tests</p> <p>In certain jobs defined by Paks II Ltd (in particular: instructors), only persons who are psychologically suited to the job and the special workload of the job may be employed. In all cases, the psychological examination shall be carried out by a specialist appointed by Paks II Ltd. The examination shall focus exclusively on the skills, abilities and characteristics relevant to the job. Paks II Ltd. shall only be aware of the findings of the examination (suitable, unsuitable, suitable with certain conditions and restrictions). The person concerned will be informed of the purpose and results of the assessment. If the person concerned prohibits the assessment or subsequently refuses to disclose the results of the assessment to Paks II Ltd, Paks II Ltd may refuse to establish the employment relationship and may terminate the existing employment relationship.</p>	<p>Data on aptitude tests: the Paks II. Ltd. manages the results of the person's medical examination (fit, unfit, temporarily unfit) and the data on the job-related aptitude tests.</p>	-Check the suitability of the person concerned.	The legal basis for the processing is the data subject's consent and the steps taken by the data subject to conclude the contract between the data subject and Paks II.	The data are part of the personnel register and the duration is as defined there (in principle, three years after the termination of employment). Alternatively, during the period of employment, these data may have to be provided on request by the authorities in order to guarantee nuclear safety.	third parties (applicants)
<p>Camera system, data processing for security purposes</p> <p>A camera system is in operation on the premises of Paks II. In all cases, the cameras are clearly visible and the existence of the cameras and the fact that they are being monitored is obvious to everyone. The cameras only monitor areas where it is justified for the safety of persons and property (e.g. access points, pedestrians). There are no cameras in places where employees and other stakeholders take their rest or breaks, or where surveillance infringes on individual rights. Cameras are not used by Paks II Ltd to monitor or control work and are only used for the security of persons and property. Images from the cameras are not monitored continuously, but are recorded. The recordings may be known and used only if an event makes it necessary. In all cases, access to the recordings is logged.</p>	The recorded images.	Maintaining the security of persons and property; -Trust protection.	The legal basis for data processing is the enforcement of the legitimate interest (personal and property security) of Paks II.	Paks II Ltd. will delete the recordings after a maximum of three working days. If the recording is the subject of legal proceedings or the application of a legal sanction, Paks II Ltd shall save the necessary part of the recording and keep the saved part for as long as necessary. In this case, the data shall be deleted when the purpose of the processing ceases to exist.	third parties (visitors)
<p>Processing of data relating to permanent and long-term access authorisations</p> <p>Access to the facilities of Paks II Ltd. is only possible with permanent, long-term or ad hoc access permits. The data related to the access permits are recorded by Paks II Ltd.</p>	The data on the access authorisations (name, date and place of birth, name of employer, department) and the data relating to the authorisation.	-The organisation of work; - Maintaining public and property security -Trust protection.	The legal basis for data processing is the performance of a contract between the data subject and Paks II Ltd. and (in the case of external contract partners) the enforcement of the legitimate interests of Paks II Ltd. as data controller (personal, property and operational security).	Paks II. Ltd. shall keep the data for a period of six months after the expiry date of the access permits, or six months from the date of the ad hoc access permit or access card.	persons with permanent access (employees, external contractors)
<p>Processing of data relating to daily access authorisations</p> <p>An access control system is in operation within the facilities of Paks II. A person with an access card uses his/her personal card to enter and exit each facility, thus recording the time of entry and exit. Each part of the building is closed off from the other by card-only doors or swing gates, where it is justified that only authorised persons should pass through the access point. In this case, the time of passage shall be recorded in the system. The data processing is automated and the data are recorded by the IT system of Paks II Ltd. Paks II Ltd. uses the data only if an event or control makes it necessary (e.g. crime against property, personal injury). Access is always logged, i.e. it is possible to know who has access to the data and when.</p> <p>Access to the Site area of Paks II Ltd. may be granted with a paper access permit. The paper access permit shall be filled in on entering or leaving the site with the assistance of the security service present. One copy of the access permit shall be kept by the applicant on entry and one copy by the security service. When leaving the site, the copy of the permit applicant's copy shall be kept by the security service until it is handed over to Paks II Ltd.</p>	<p>The data on the daily access permits (name and address of the person concerned) and the data relating to the permit.</p> <p>Access card data: Paks II Ltd. manages data related to access cards, such as when and where access cards were used in Paks II Ltd. facilities.</p> <p>Data on paper entry permits (name and identity card number or passport number of the person concerned, employer and job title)</p>	-The organisation of work; - Maintaining public and property security -Trust protection.	The legal basis for data processing is the performance of a contract between the data subject and Paks II Ltd. and the enforcement of the legitimate interests of Paks II Ltd. as data controller (personal, property and operational security).	The data is kept for 72 hours from midnight on the day in question.	third parties (occasional visitors, visitors)

<p>Access control system data management</p> <p>An access control system is in operation within the facilities of Paks II. The data subject is identified on entering and leaving each facility by using his/her personal identification card to record the time of entry and exit. Each part of the building is locked off from the other by card-only doors or swing gates, where it is justified that only authorised persons should pass through the point. In this case, the time of passage is recorded in the system. The data processing is automated and the data is recorded on the server of MVM BSZK Ltd. Paks II. Ltd. will only use the data if an event or control makes it necessary (e.g. crime against property, personal injury, control of work). Access is always logged, i.e. it is possible to know who has access to the data and when.</p>	<p>The number of the access card, the name and address of the card holder.</p>	<p>- Maintaining the security of persons, property and operations</p>	<p>The legal basis for data processing is the enforcement of the legitimate interest of Paks II. Ltd. as the data controller (personal, property and operational safety).</p>	<p>The data is kept for 72 hours from midnight on the day in question.</p>	<p>Employees (visitors)</p>
<p>High-security personal authentication at the Company's sites and IT assets using biometric (palm vein network) identification technology</p> <p>The Data Controller (Paks II. Zrt., Data Controller) shall operate a biometric authentication access control system and a biometric authentication log-in device at its headquarters and premises for the purpose of identifying persons passing through access points and logging into the Data Controller's system on the Data Controller's computer.</p>	<p>- the vein print - which is not stored - is needed for the generation of the HASH code which cannot be decrypted - the stored HASH code and the name of the natural person concerned for identification at the time of entry - the time of entry and exit to each site</p>	<p>Access/authorisation management for corporate access control and IT workstations requires the use of high-security personal authentication technology that can be used to significantly reduce the high level of risk and exposure to corporate property, data assets and information.</p>	<p>The Data Controller processes personal data in accordance with Article 6(1)(f) of the GDPR, Article 9 of the GDPR and Article 11 of Act I of 2012 on the Labour Code (hereinafter: Labour Code).</p>	<p>- Employees of the Data Controller - on the basis of a valid employment contract - have a permanent, independent access permit. The Data Controller shall keep the data for a period of six months after the expiry of the access authorisations. - The Data Controller's contractual partners may have long-term access authorisations until the end of the contractual relationship and until the performance of the contract. The Data Controller shall keep the data for a period of six months after the expiry of the access authorisations. - In the case of guests arriving at the Data Controller, data relating to ad hoc access authorisations shall be kept by the system for 72 hours from midnight of the day in question. An exception to this is the investment area of the Data Controller, where the Data Controller keeps records until the end of the year in question at the most, in order to fulfil the requirements of Article 11 of Act CXVI of 1996 on Nuclear Energy.</p>	<p>employees, third parties (visitors, persons entering the Site)</p>
<p>Data processing in connection with national security audits</p> <p>National security clearance is mandatory for certain persons cooperating with Paks II Ltd (acting on behalf of contractors) if the person concerned needs to know or is required to know national classified information or if his/her activities justify it. National security checks are carried out by the Office for the Protection of the Constitution on the basis of Act CXXV of 1995 on National Security Services. Paks II Ltd. shall inform the person concerned in each case whether the activity is subject to a national security check. Paks II Ltd. does not have access to the data of the person concerned in connection with the check, and the data are processed by the Office for the Protection of the Constitution. In all cases, national security checks are carried out with the knowledge and consent of the data subject. If the person concerned refuses to give consent, he/she may not hold a job subject to the check or, if he/she has approved the establishment of the legal relationship prior to the check,</p>	<p>Name, date and place of birth, mother's name, job title, result of the medical examination (no details).</p>	<p>Preparing, carrying out and evaluating safety inspections; - Maintaining the security of persons, property and operations; -Trust protection; -Exercise of rights and obligations arising from the legal relationship between the parties; -Fulfilling obligations imposed by law.</p>	<p>The legal basis for processing is the law and the consent of the data subject.</p>	<p>The data will be processed by Paks II. Ltd. for the duration of the legal relationship subject to national security control.</p>	<p>third parties</p>

<p>Paks II Ltd may terminate the legal relationship subject to the national security check. Following the inspection, the Office for the Protection of the Constitution shall prepare a security opinion containing the data specified by law, which shall be sent to Paks II Ltd. The person concerned shall be informed of the contents of the expert opinion. The inspection is repeated (reviewed) in the cases specified by law.</p>					
<p>Accident-related data processing</p> <p>Paks II Ltd. investigates all accidents that occur in its facilities and other accidents that may be considered as industrial accidents. In the course of this, the details of the persons involved in the accident and of the persons otherwise affected, as well as the details of the accident (place, time, description, witnesses) are recorded. In the course of the investigation, Paks II Ltd. will interview the persons involved and witnesses, investigate the causes of the accident in order to establish the disciplinary liability justified in connection with the accident and to prevent further accidents.</p>	<p>Data required for identification: surname and forename, name and surname at birth, place and date of birth, mother's name at birth, address, place of residence, type and number of identification document. The purpose of processing the data is to identify the data subject, to contact him or her and, where necessary, to pursue claims.</p> <p>Workplace inspections, data on incidents: Paks II Ltd. regularly monitors the work performance, fitness for work, working capacity and alcohol consumption of its employees; it also keeps records of incidents at the workplace, in particular accidents at work. The data relating to these are managed by Paks II Ltd.</p>	<p>-Ensuring the operation of Paks II Ltd; - Maintaining the security of persons, property and operations. -Fulfilling obligations imposed by law.</p>	<p>The legal basis for data processing is the provision of the law (Act XCIII of 1993 on Occupational Safety and Health) and the enforcement of the legitimate interest of Paks II. Ltd. as the data controller (prevention of accidents, liability assessment).</p>	<p>The data will be kept for the duration of the official procedures and internal investigations related to the accident, after which they will be deleted immediately.</p>	<p>employees and persons authorised to enter the facilities of Paks II.</p>
<p>Data management related to access authorisations</p> <p>Paks II Ltd. ensures the protection of its business secrets through appropriate organisational measures and regulations. Access to particularly protected business secrets and confidential data is only possible to persons who have a permanent or one-off access authorisation to access documents containing the Company's business secrets and a signed declaration of conflict of interest and confidentiality. Paks II Ltd. processes data related to access authorisations, such as the data of the access authorisation holders, the data related to the granting of the access authorisation and the data related to the use of the access authorisation.</p>	<p>The identification data on the access authorisation and the data relating to the authorisation.</p>	<p>-Comply with personal, administrative, physical and electronic security requirements for data classified as business secrets</p>	<p>The legal basis for data processing is the enforcement of the legitimate interest of Paks II Ltd. as data controller (protection of business secrets pursuant to Act V of 2013 on the Civil Code)</p>	<p>The retention period of the data is related to the employment relationship of the data subject or the contractual relationship with the Company, after the end of which the data will be deleted immediately.</p>	<p>employees and third parties</p>
<p>Checking for alcohol intoxication</p> <p>If the person concerned is working for Paks II. Ltd. within the facilities of Paks II. Ltd., he/she must be able to work, must not be under the influence of alcohol, especially taking into account that working in such a state endangers the safety of persons and property. If there is a suspicion that the person concerned has consumed alcohol, the representative of Paks II. The procedure and means of the check shall be laid down in the internal rules of Paks II Ltd. In all cases, a record of the check shall be drawn up.</p>	<p>The name of the person concerned, the result of the investigation.</p>	<p>-Ensuring the operation of Paks II Ltd; - Maintaining the security of persons, property and operations.</p>	<p>The legal basis for data processing is the enforcement of the legitimate interest (safe operation) of Paks II.</p>	<p>In the case of a negative result, the data will be deleted by Paks II. In the case of a positive result, taking into account that the data may be used in a dispute, the data controller shall process the data until the limitation period for the claim arising from the audit (five years from the date of the data creation). The data will be processed by Paks II Ltd. for five years after the expiry of the permit.</p>	<p>employees and third parties</p>
<p>Data processing in connection with human security investigations</p> <p>The Employer will conduct a human risk screening of proposed or newly hired individuals/employees. The Employer will conduct a human security investigation if it becomes aware of employee conduct that violates a law or other employment rule; or becomes aware of illegal conduct from another source; and may also conduct an investigation at the individual discretion of the CEO. The person concerned will be informed of the investigation if personal liability can be established. During the</p>	<p>Data from security and other controls and open source data.</p>	<p>- Preparing, conducting and evaluating safety inspections; - Supervision and management of the work of the person concerned; - Investigation and assessment of disciplinary offences;</p>	<p>The legal basis for the processing is the preparation of a contract between the data subject and the Employer, and the enforcement of the legitimate interest (risk reduction) of the Employer as data controller.</p>	<p>The data relating to human security clearance are the records of the General Security Department, for which the retention periods for the General Security Department's file batch number are relevant.</p>	<p>employees and/or applicants</p>

<p>investigation, the Employer will investigate the offending conduct, interview the data subject, other employees and may check public data (accessible to anyone). The Employer will not collect confidential information during the inspection. The employee concerned shall be informed of the inspection if there is a human risk relating to his/her person.</p>		<p>- Maintaining the safety of persons and property;</p>			
<p>Data processing in relation to conflict of interest investigations</p> <p>The Employer shall define in its internal rules the type of employer, the type of job that employees are not allowed to hold in addition to their existing employment with the Employer and the type of additional employment that must be declared. The Employer shall systematically provide a declaration of conflict of interest, which shall include a prohibition on the creation of additional employment relationships, the scope of employment relationships that must be declared or authorised and a list of additional employment relationships. The declaration must be signed by the person concerned as a condition of employment.</p>	<p>Data necessary for identification: surname and forename, name and surname at birth, place and date of birth, mother's name at birth, address, place of residence, identity card number. The purpose of processing the data is to identify and contact the person concerned (in relation to questions concerning the validity of the public security clearance). Basic job data: the job title held by the data subject, the area of work, the end of the fixed-term contract, if the contract is of limited duration, the employer's internal identification number, Additional employment relationships: the Employer processes data on additional employment relationships that are required to be reported under internal rules.</p>	<p>- Finding out the data and circumstances (e.g. education, skills) relevant to the employment relationship; - Protection of confidentiality; - Identifying and mitigating risks to the interests of employees.</p>	<p>The legal basis for the processing is the performance and preparation of the contract between the data subject and the Employer, as well as the enforcement of the legitimate interest of the Employer as data controller (risk reduction, confidentiality).</p>	<p>15 years, subject to the Archive Plan.</p>	<p>employees, potential new recruits</p>
<p>Newsletter</p> <p>The Company would like to send a newsletter with the following content from the email address hirlevel@paks2.hu to strengthen social relations and the Company's brand:</p> <ul style="list-style-type: none"> • Lead thread - introducing the featured news of the period and then navigating to the Society's website. • Updates, programme recommendations - Relevant information about the launch of Atmosphere magazine or where people can meet us (job fairs, truck stops, information booths, scholarship programme launches, etc.). In this section, we would direct the reader to the website with one news item and to Facebook with another. • Job Booking - To draw attention to a specific position and navigate to the Careers Portal. • Colour - visuals, infographics, photo galleries, etc. <p>On the part of the Company, the recipients' data (name, email address) may only be disclosed to individual employees of the Human Resources Directorate, the Operations Directorate and the Communications Directorate, to the extent necessary for the performance of their duties.</p>	<p>Name and email address of the recipient of the newsletter.</p>	<p>Maintaining and strengthening the social relations of Paks II. Ltd.</p>	<p>The data processing is based on the prior consent of the data subject (the recipient of the newsletter), with the possibility to unsubscribe in all newsletters.</p>	<p>The Company will delete the data if the data subject requests it (withdraws his/her consent) and there is no other legal basis for the processing.</p>	<p>third parties (newsletter recipients)</p>
<p>Events - managing participants' data</p> <p>Paks II Ltd. processes the data of the persons registering for the event organised by it and participating in the event. The purpose of the data processing is to ensure access to the event, to perform the tasks necessary for the organisation of the event (e.g. transfer administration, catering coordination), to inform the data subject before and after the event about the given and possibly further events, events related to Paks II.</p>	<p>Name of the data subject, name of the organisation delegating the data subject, telephone number of the data subject, e-mail address. In case of a visit to a nuclear power plant, in addition to the above, place and date of birth, mother's name, identification card number. We also register</p>	<p>-Identifying the data subject, contacting and maintaining contact with the data subject; -Organising and running events; -Registering and contacting people attending events; -Promoting the events of</p>	<p>The legal basis for the processing is the consent of the data subject, or if this cannot be obtained due to the nature of the event or the way it is organised (time limit, technical constraints), the data subject will be informed of the processing at the event and will consent to it by attending the event.</p>	<p>Paks II Ltd. will delete the data if the data subject requests it (withdraws his/her consent) and there is no other legal basis for the processing. In the absence of such consent, Paks II Ltd. shall also delete the data if the purpose of the processing ceases to exist, in particular if no future events take place to which the data</p>	<p>employees and third parties (participants)</p>

	the names, telephone numbers and e-mail addresses of the partners involved in the organisation of the event. For example: hotel contact persons, catering and other services partners.	Paks II Ltd., preparing information materials.		subject is invited or about which the data subject is informed.	
Events - making recordings Paks II Ltd. shall take photographs, video and audio recordings at certain events organised by Paks II Ltd. or involving Paks II Ltd. (in particular: press conferences, conferences, external parliamentary committee meetings, public forums, job fairs, academic or scientific lectures given by employees of Paks II Ltd.). The fact that the recording is taking place will be indicated in the on-site information and information material for the event in question and will be made in a public and visible manner. The purpose of the recording is never intended to represent an individual (unless the data subject gives his or her express prior consent), but always to present the event. The controller is entitled to publish the recordings on its online and offline communication platforms. The data subject may object to the creation and publication of the recordings. The reason for the inclusion is that the activities of Paks II Ltd. are considered to be of outstanding national economic importance. Taking into account that the establishment and operation of Paks II will determine the energy, budgetary and financial situation of Hungary for decades, it is important to ensure that these records are accessible and researchable.	The video and audio recordings and photographs made.	-Promoting the events of Paks II Ltd., preparing information materials; -Documenting the activities of Paks II Ltd.	The legal basis for data processing is the legitimate interest of Paks II. Ltd. as the data controller (archiving, documentation, future research, verification of contractual performance, presentation and promotion of the event), and the consent of the data subject, which he or she gives by participating in the event with the knowledge of the recording.	Paks II Ltd. shall store the records for 2 (two) years, after which the justification for further storage shall be reviewed every two years.	employees and third parties (participants)
Records managed for media relations purposes In its relations with the media, Paks II Ltd. maintains local, regional and national media contacts with representatives of the media. In the course of these contacts, the names and contact details of the heads and editors of the individual media are stored and updated, and targeted information is forwarded to them or press enquiries are received from them. It is in the exercise of these activities that, precisely because of the nature of the contacts and the press, inquiries are received without a legal relationship.	Name, position, name of the media delegating the data subject, telephone number and e-mail address of the data subject.	Ensuring contacts with the media.	The legal basis for data processing is the enforcement of the legitimate interest of Paks II. Ltd. as the data controller (maintenance of press relations).	The Company will delete the data if the data subject requests it (withdraws his/her consent) and there is no other legal basis for the processing. In the absence of such consent, the Company will also delete the data if the purpose of the processing ceases to exist, in particular if no further events to which the data subject's invitation is justified take place.	third parties (media representatives)
Records managed for social networking purposes In its relations with society, Paks II Ltd. maintains local, regional and national contacts with representatives of organisations and institutions. In the course of these contacts, the names and contact details of the individual leaders and representatives are stored and updated, and information is forwarded to them or requests are received from them.	Names, titles, postal addresses, telephone numbers and e-mail addresses of the data subjects.	Ensuring liaison with the various social organisations.	The legal basis for data processing is the enforcement of the legitimate interest of Paks II. Ltd. as the data controller (maintenance of social relations).	The Company will delete the data if the data subject requests it (withdraws his/her consent) and there is no other legal basis for the processing. The Company will also delete the data if the purpose of the processing ceases to exist.	third parties
Information from opinion polls Paks II Ltd. will periodically commission public opinion surveys and may also conduct focus group surveys. During the surveys (main and control research) a final report in Hungarian and English and a presentation in Hungarian and English will be prepared, while in the case of focus group research, this will be supplemented by a transcript of the interviews and a video or audio recording of the interviews. The consent of the participants will be obtained by the contractor organising the public opinion research and the audio recordings will be forwarded to Paks II.	Audio and video recordings of the focus group research participants' discussions.	Finding out public opinions on Paks II Ltd.	The legal basis for data processing is the legitimate interest of Paks II Ltd. as the data controller (to learn about public opinions about Paks II Ltd.).	The audio and video recordings will be deleted after the transcript has been checked, but no later than 30 days after the receipt of the recordings.	third parties
Intranet publication The intranet data content may also be accessed by external persons within certain limits regulated by the Company, in particular: - employees of the ministry of the minister without portfolio (PTNM) responsible for the design, construction and commissioning of the two new units of the Paks nuclear power plant; - employees of PIP Nonprofit Ltd.	name, work contact details - telephone number and email address), location, job title, department; photograph	To ensure compliance with the Company's role as a state-owned company, to facilitate proper communication and information flow between the Company Founder and the companies under the ownership of the Company	The legal basis for data processing is the legitimate interest of the Company, as it is necessary for the continuous and efficient work that the employees of the organisations with close economic and ownership relations with the Company can get access to the professional	The individual telephone directory data are stored in the system until the employee's employment is terminated, after which they are deleted. Paks II Ltd. will store the other (photographic) records for 2	employees, closed external access points (PTNM, PIP)

<p>Such data content involving personal data includes in particular:</p> <ul style="list-style-type: none"> - the company telephone directory (name, work contact details - telephone number and email address), location, position, department) - news and content on the intranet (for example, with a photo of the employee) <p>However, the content of the intranet is never public and is only accessible to a limited circle of people regulated by the Directorate of Media and Communication.</p>		Founder.	information of the Company and can maintain effective contact with the employees of the Company in any form.	(two) years, after which the justification for further storage will be reviewed every two years.	
<p>Data processing in relation to your Company Facebook profile</p> <p>Facebook users can join the Company's Facebook profile as followers on a voluntary basis. The Society produces its own internal statistics on the social interest in its appearances. The Company does not process any data on the acceptance of the appearances, the reactions and counter-reactions of its readers and Facebook users, and does not create a separate database of followers of the Company's Facebook page.</p>	The Company has access to the Facebook names of its followers through its Facebook system.	Finding out public opinions on Paks II Ltd.	The legal basis for processing is the data subject's consent by joining the Facebook page.	Facebook's system automatically deletes the data if the data subject unsubscribes or deletes their Facebook profile.	third parties (followers of the Company's Facebook page)
<p>Representation</p> <p>Paks II Ltd. carries out gift-giving activities for representational and business purposes, handles personal gifts in the case of representation and keeps records of the gifts received. The Company keeps records of the name and position of the person making the gift, the name and position of the partner making the gift and the name of the company, as well as the name, item number and cost price of the representative gift item chosen.</p>	Name, serial number, position, department of the donor; Name, company name, position of the person to be donated; Name, item number, price of the representative gift. On transfer of the transfer: name of the transferee. serial number. name of the transferor	Maintaining and promoting the business relations of Paks II Ltd.	The legal basis for data processing is provided by Act CXVII of 1995 on Personal Income Tax (Personal Income Tax Act), as the Company is required to keep a record of the fact of the gift and the related data.	The retention period is 15 years under the Tax Act.	third parties (business partners) employee (donor and recipient, transferor)
<p>Data processing for business-related catering, accounting of business gifts</p> <p>When accounting for business hospitality or business gifts, the name of the company or individual who received the hospitality must be indicated.</p>	Name, serial number, position, department of the donor; Name, company name, position of the person to be donated; Name, item number, price of the representative gift. On transfer of the transfer: name of the transferee. serial number. name of the transferor	Maintaining and promoting the business relations of Paks II Ltd.	The legal basis for data processing is provided by Act CXVII of 1995 on Personal Income Tax (Personal Income Tax Act), as the Company is required to keep a record of the fact of the gift and the related data.	The retention period is 15 years under the Tax Act.	third parties (business partners) employee (donor and recipient, transferor)
<p>Organising and running campaigns</p> <p>As part of the operation of the internal communication system, Paks II Ltd. conducts several internal campaigns to encourage employees to represent the Company and participate in events such as the Danube crossing, children's drawing competition, photo competition, other sports competitions. During these processes, we record personal data of employees (and, if they have given their express consent in a separate declaration, of their relatives - both adults and minors). We publish the names of the participants, photos, video and audio recordings of the campaign in the Company's own publications, calendars, website, intranet pages, bulletins and other communication platforms. As this activity goes beyond the nature of the employment relationship between the Company and its employee, the consent of the employee or his/her relative, or in the case of a minor, the person having parental authority, is required in all cases for the processing of data in this context.</p>	Names, contact details, photo, video and audio recordings of the data subjects involved.	Increasing employee engagement, building community.	The legal basis for data processing is the consent of the employee or a relative, or the application for participation.	Two years from the date of taking the photograph, video or audio recording, with the Employer reviewing the need to retain the data after the two years have elapsed.	employees, external parties
<p>Corporate social responsibility programmes</p> <p>Paks II Ltd. organises several charity programmes to strengthen the Company's role in social responsibility. Employees are also involved in these programmes. The names of the participants, photos, video and audio recordings taken during the programme will be published in the Company's own publications, calendars, website,</p>	Name and contact details of the participating employee, name and contact details of the contact person of the external partner, photo, video and audio recordings.	Maintaining and strengthening the social relations of Paks II Ltd.	The legal basis for data processing is the consent of the employee or a relative, or the application for participation.	Two years from the date of taking the photograph, video or audio recording, with the Employer reviewing the need to retain the data after the two years have elapsed.	employees, external parties

intranet pages, bulletins and other communication platforms, subject to their explicit consent in a separate statement.					
<p>Contents of the bulletin boards at the premises of Paks II.</p> <p>Paks II Ltd. is responsible for updating the content of the bulletins on the company's sites. Where appropriate, content, such as advertisements, is posted at the request of employees or other external natural persons.</p>	Name and contact details of the employee or third party concerned.	Increasing employee engagement, building community.	The legal basis for data processing is the consent of the employee or a relative or third party, or the application for participation.	The Company will delete the data if the data subject requests it (withdraws his/her consent) and there is no other legal basis for the processing. Failing this, the Company shall also delete the data if the purpose of the processing has ceased, but the data shall in any event be deleted no later than 90 days after the date of the disclosure.	employees, external parties
<p>Data processing in relation to the „Atmosphere” company periodical</p> <p>The use for communication purposes of images in the Company's magazine „Atmosphere” and photographs taken to illustrate the article or provided by the data subject on the Company's own communication platforms or on other communication platforms operated and managed by a contractor, i.e. the Company's online platforms, including the internal intranet site, or on any advertising and communication platforms.</p>	The image of the data subject (employee or third party), certain personal data provided by him or her (in particular: marital status, professional history, leisure activities).	Maintaining the social relations of Paks II Ltd. and strengthening the community.	The legal basis for the processing is the data subject's consent pursuant to Article 6 (1) (a) of the GDPR, subject to Section 2:48 of Act V of 2013 on the Civil Code.	Paks II Ltd. shall store the records for 2 (two) years, after which the justification for further storage shall be reviewed every two years.	Employees, third parties
<p>Data processing related to contacts for contracts</p> <p>If Paks II. Ltd. concludes a contract with another party (parties), the contract or other documents related to the contract and generated in the course of the performance of the contract shall contain the data of the representative or contact person of the other party, as well as the data of persons acting in the interests of the other party, who are involved in the performance of the contract. The data are processed by Paks II. Ltd. in the course of the performance of the contract for the purpose of the performance of the contract.</p>	Data included in the contract, depending on the contract: name, contact details, title of the data subject, role in the performance of the contract.	-Identifying the data subject, contacting and maintaining contact with the data subject; -Preparation, conclusion and performance of contracts concluded or planned to be concluded by Paks II; -Exercising rights and obligations arising from a legal relationship.	The legal basis for the processing is the legitimate interest of Paks II. Ltd. as the data controller (maintaining contact during the performance of the contract).	The data will be processed by Paks II. Ltd. in the contract for as long as a claim can be made on the basis of the contract (five years after the termination of the contract), subject to the provisions of the Civil Code. 6:22 of the Civil Code, according to which civil law claims expire after five years.	employees and third parties (contractors)
<p>Data processing of assets owned (or otherwise managed under a legal relationship) by Paks II Ltd.</p> <p>In the fixed asset register, assets transferred to third parties are also assigned to the responsible user Paks II Ltd. The responsible user has a transfer declaration, which may include personal data of an individual third party.</p>	The name of the person concerned (the user of the device), the name of the device and the details of its transfer.	-Ensuring the operation of Paks II Ltd; - Maintaining the security of persons, property and operations; -Fulfilling obligations imposed by law.	The legal basis for data processing is the provision of law (legislation on reporting, accounting, inventory), the enforcement of the legitimate interest of Paks II. Ltd. as data controller (protection of assets).	The data will be processed by Paks II Ltd. for a period of five years.	third parties
<p>Travel arrangements and related administration</p> <p>In order to organise foreign travel related to the implementation of the Paks II project and to process visa and invitation passport applications and administration, it is necessary to temporarily process the data contained in the passport of the person concerned or a copy of the passport, in accordance with the aliens' regulations of the country of destination.</p> <p>The travel department of Paks II. Ltd. transfers the necessary personal data to the service providers (airlines, accommodation providers, insurers) in order to process bookings (airline tickets, accommodation, travel insurance). Since the list of these services varies from one country and destination to another and is constantly changing, it is not possible to provide a complete list of these services, but the travel agency can provide up-to-date information at any time.</p> <p>The Travel Management software is used to organise your trip.</p> <p>Information on HIV testing requirements</p> <p>According to the internal legislation of the Russian Federation, the long-stay visa requirement is an HIV test.</p> <p>Taking into account that the test contains data on health status, it is considered as a</p>	Passport details Copy of your passport (if necessary, depending on the requirements of the country of destination) Registered address and telephone number Name, place of employment, job title Authorisation for visa application	Providing travel abroad for employees and external partners involved in travel arrangements for work purposes.	The legal basis for the processing is the consent of the data subject and the regularity of the accounting related to the postings, in accordance with the provisions of Act CXVII of 1995 on personal income tax.	In the case of employees, the retention period of the data is three years after the termination of the employment relationship, with regard to Section 286 (1) of the Labour Code. In the case of external partners, one year after the last trip, if the existing contractual relationship (fixed-term contract, unexpired framework contract, obtaining permits, conducting audits) suggests that further travel may be necessary. Otherwise, the data will be deleted after the trip.	employees, external partners

<p>special category of personal data and its processing is only possible pursuant to Article 9(2)(a) of the GDPR if the data subject gives his or her explicit consent to the processing for a specific purpose.</p> <p>The details of the test are not known to the employer as data controller, no information is collected and it is not linked to a profile.</p> <p>Failure to take the test will not result in any disadvantage other than the impossibility of applying for a long term visa, nor will it have any legal consequences in the context of the employment relationship.</p> <p>Article 49 of the GDPR provides for the possibility to transfer personal data to a third country, in this case the Russian Federation, in the absence of an adequacy decision pursuant to Article 45(3) or appropriate safeguards pursuant to Article 46, including binding corporate rules, if the data subject has given his or her explicit consent after having been informed of the potential risks of the transfer due to the absence of an adequacy decision and appropriate safeguards.</p> <p>The risk involved in the present transfer is that the Company has no control over the data processing processes of the state administration, authorities of the Russian Federation and cannot directly ensure or enforce an adequate remedy and/or data protection authority procedure in the Russian Federation.</p> <p>In view of the above, the data subject gives his/her consent to the Company's processing of data in connection with the HIV test by giving his/her authorization to the travel agency, which expressly refers to this privacy policy.</p> <p>In the absence of such consent, the long-stay visa may be processed under the data subject's own initiative.</p>					
<p>Data management in the nuclear supplier audit process</p> <p>The Company, as a nuclear licensee, shall develop and operate a qualification system for the selection of suppliers and their suitability in accordance with the applicable legislation, in particular the Atomic Energy Act and the NSZO. The Company shall verify the suitability of suppliers for its own activities to maintain the capacity of the Paks NPP or for the suppliers it wishes to engage under the EPC contract by the EPC contractor it has contracted. The nuclear qualification process will assess the ability to meet the requirements on a contract by contract basis.</p>	<p>Possible sources of data: audit evidence checklist audit plan audit report deviation sheet attendance sheet correspondence</p> <p>Scope and list of data processed: Name of person working for the company to be certified Passports E-mail address of the person working for the company to be certified School education ID of the document certifying your education Professional experience Certificate Job title, responsibilities in the audited company Minutes Instructions Documents to be supplied Job description Employment contract</p>	<p>Article 6 GDPR - Lawfulness of processing The processing of personal data is lawful only if and to the extent that at least one of the following conditions is met: (c) processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p>Government Decree No 118/2011 (11.VII.) - on the nuclear safety requirements of nuclear installations and the related activities of the authorities § 30 (1) The licensee may involve suppliers in activities concerning nuclear safety in accordance with the requirements of Annexes 2 to 10. In this case, the licensee shall be responsible for maintaining nuclear safety. The licensee of the nuclear installation shall develop and operate a qualification system in accordance with Annexes 2 and 9 to verify the suitability of the suppliers it intends to engage.</p>	<p>Conducting procedures to assess the contractual obligations and the ability of the suppliers (whether the supplier is the Company or the EPC Contractor) to be involved in the capacity maintenance of the Paks NPP to meet the requirements of the NSC.</p>	<p>The data will be processed by Paks II for the duration of the relationship with the supplier.</p>	<p>persons involved in the nuclear qualification procedure or employees of the companies involved</p>
<p>The cleaning of 7030 Paks, topographical nr.. 8803/17., building No. 1124.</p> <p>The purpose of the data processing is to provide the employees of ATOMIX Ltd.</p>	<p>name, address, employer's name, photograph processed by the Company</p>	<p>for the employees of ATOMIX Ltd. employed as cleaners at the 7030 Paks, topographical nr.</p>	<p>the legitimate interest of the controller pursuant to Article 6(1)(f) of the GDPR: the organisation of</p>	<p>the data will be stored by the Company only for as long as the employee is working in the</p>	<p>employees of third parties (ATOMIX Ltd.) employed in the same job</p>

employed as cleaners at the 7030 Paks, hrsz. 8803/17., Barrack building No. 1124, by providing the key card for this purpose.		8803/17., building No. 1124, by providing the key management module and the key card for this purpose	work; the maintenance of the safety of persons and property	Barracks building or until the key card is revoked, after which the data will be immediately and irretrievably deleted	
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V. OTHER INFORMATION RELATING TO DATA PROCESSING

5.1. Data transmission

Paks II. Ltd. will only transfer personal data to third parties if the data subject has given his or her unambiguous consent - knowing the scope of the data transferred and the recipient of the data transfer - or if the transfer is authorised by law. The transfer is mandatory if it is made on the basis of a lawful request by the police, public authority or law enforcement authority in accordance with the applicable law. In addition, the following legislation provides for an obligation to transfer data:

- Act LXXX of 1997 on persons entitled to social security benefits and private pensions and on the coverage of these services (data to be provided to the social security administration bodies, tax authorities, for the purpose of social security registration);
- Act LXXXI of 1997 on Social Security Pension Benefits (providing information to the pension insurance administration for the purpose of recording the length of service, earnings and other data required for pension entitlement and pension determination);
- Act XCIII of 1993 on Occupational Safety and Health (data reporting to the Occupational Safety and Health Authority, reporting of accidents at work, registration of workers exposed to carcinogens, registration of serious accidents at work);
- Act CL of 2017 on the Rules of Taxation (providing information to the tax authority on the payment of taxable amounts, the assessment of tax or the issuance of a certificate entitling to tax relief).

5.2. Data processing

Paks II. Ltd. is entitled to use a data processor for the performance of its activities. The processors do not take independent decisions, they act on behalf of Paks II Ltd. in the course of data processing on the basis of a written contract with Paks II Ltd. and in accordance with the terms of the contract and the instructions of Paks II Ltd. Paks II Ltd. shall monitor the work of the data processors. Processors shall only be entitled to use an additional processor with the consent of Paks II Ltd. Paks II Ltd. shall use it as a data processor:

Nemzeti Üzleti Szolgáltató Zártkörűen Működő Részvénytársaság (7030 Paks, Gagarin utca 1.), the purpose of data processing: payroll, personnel administration.

MVM Paks Nuclear Power Plant Limited Liability Company (7030 Paks, parcel no. 8803/17.), the purpose of the data processing: maintaining the security of persons, property and plants (management of data from access control and camera systems).

MVM OVIT Országos Villamostávleíték Zártkörűen Működő Részvénytársaság (1158 Budapest, Körvasútsor u 105-106.), the purpose of the data processing: maintaining personal, property and operational security, access control and camera system data management).

CIVIL Security Service Limited Liability Company (1149 Budapest, Angol utca 77.), the purpose of the data processing: maintaining the security of persons, property and business (management of data from access control and camera systems).

MVM BSZK Security Service Center Limited Liability Company (1117 Budapest, Budafoki út 54.), the purpose of data processing: maintaining personal, property and operational security (management of data from access control and camera systems).

Jánosik & Partners Industrial, Service and Maintenance Limited Liability Company (1047 Budapest, Attila utca 34.), the purpose of the processing is: maintaining the security of persons, property and business (management of data from access control and camera systems).

SZENTINEL Ltd. (1138 Budapest, Váci út 152-156.), the purpose of data processing: maintaining personal, property and operational security (management of data from access control and camera systems).

GPSmart Ltd. (1213 Budapest, Juharos u. 29.), the purpose of the data processing is the positioning of vehicles managed by the company (management of GPS modules).

5.3 Data security, access to data

Paks II. Ltd. shall ensure the security of the data, take the technical and organisational measures and establish the procedural rules that ensure the implementation of the data security requirement. Paks II Ltd. shall keep records of the data it processes in accordance with the applicable legislation, ensuring that the data may only be accessed by employees and other persons acting in the interests of Paks II Ltd. who need to know it in order to perform their job or duties, and that only data necessary for the performance of the person's job may be accessed. Confidentiality is a professional obligation for all employees.

Paks II. Ltd. shall ensure, in particular, within the scope of its IT security tasks:

- Measures to protect against unauthorised access, including protection of software and hardware devices and physical protection (access protection, network protection);
- Measures to ensure the possibility of recovery of data files, including regular backups and separate secure management of copies (mirroring, backup);
- To protect data against viruses (virus protection);
- The physical protection of the data files and the devices carrying them, including protection against fire, water, lightning and other natural hazards, and the recoverability of damage caused by such events (archiving, fire protection).

Paks II Ltd. shall take the necessary measures to protect the paper records, in particular with regard to physical security and fire protection.

Employees, agents and other persons acting in the interest of Paks II Ltd. shall keep safe and secure all data media containing personal data that they use or have in their possession, regardless of the way in which the data is recorded.

5.4. Duration of data processing

Paks II Ltd. will ensure that the duration of the processing of personal data does not exceed what is necessary and lawful by establishing and maintaining rules on erasure. Data will be erased in the following cases:

- a. The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.** If the purpose for which the data were processed has ceased to exist and the processing of the data is no longer required by law, Paks II Ltd. If the legal relationship between the data subject and Paks II Ltd. is terminated, the purpose of the processing is the enforcement of claims arising from the legal relationship. Taking into account that claims arising from the employment relationship expire after three years, the data shall be deleted three years after the termination of the legal relationship.
- b. The data subject withdraws his or her consent.** If the data subject withdraws his or her consent or requests the deletion of the data, Paks II Ltd shall in each case examine whether the processing is required by law. If so, Paks II Ltd shall refuse the erasure request. If the processing of the data is not mandatory, but Paks II Ltd. has a legal basis for it and the processing is necessary for the establishment, exercise or defence of legal claims, Paks II Ltd. will examine whether the data can be deleted. If the processing of the data is not required by law, if Paks II. Ltd. has no legal basis for processing the data other than consent, or if the processing of the data is not justified despite the legal basis, Paks II. Ltd. shall delete the data at the request of the data subject. If Paks II Ltd. refuses a request for erasure, it shall in any case inform the data subject thereof, indicating precisely the legal basis for refusing the request for erasure and the legal remedies available.
- c. The data subject objects to the processing.** Where the processing is based on the legitimate interests of the controller, the data subject may object to the processing. In such a case, Paks II Ltd shall erase the data unless it can be demonstrated that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.
- d. There is evidence that the processing of the data is unlawful.** If the processing of the data is unlawful, Paks II Ltd will delete it in any case as soon as the fact of unlawful processing becomes apparent.
- e. The deletion of the data is necessary to comply with a legal obligation or has been ordered by a court or the National Authority for Data Protection and Freedom of Information.** If the deletion is required by law or ordered by a court or an authority and the order is final, Paks II Ltd. shall delete the data.
- f. The time limit for storing the data, set by law or in the consent, has expired.** If the period of data processing is provided for by law, Paks II Ltd. will delete the data after the expiry of the period provided for by law.

In the event of deletion, Paks II Ltd. will render the data unidentifiable. If required by law, Paks II Ltd. shall destroy the data carrier containing the personal data.

5.5. Handling data breaches

A data breach is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. Paks II Ltd. shall immediately notify the National Authority for Data Protection and Freedom of Information of the data protection incident, unless the data protection incident is unlikely to pose a risk to the rights and freedoms of data subjects. Paks II Ltd. shall keep a record of the data protection incidents, together with the measures related to the incident. If the incident is serious (i.e. likely to result in a high risk to the rights and freedoms of the data subject), Paks II Ltd will inform the data subject of the data breach without undue delay.

VI. RIGHTS OF DATA SUBJECTS AND THEIR ENFORCEMENT

6.1. Rights of data subjects

Information (access). The data subject has the right to be informed about the processing of his or her data. Paks II Ltd. informs the data subject about the data processing at the time of data collection, and this Notice is available to the data subject at any time. The data subject may request full information on the processing of his/her data at any time during the processing. The data subject may request Paks II Ltd to provide him/her with a copy of the data.

Correction. The data subject may request Paks II. Ltd. to correct inaccurate data relating to him/her, or to complete incomplete data.

Cancellation, withdrawal of consent. The data subject may at any time withdraw his or her consent to the processing of his or her data and request the deletion of his or her data. Paks II. Ltd. shall refuse erasure only if the processing is based on law or if the processing is necessary for the establishment, exercise or defence of legal claims.

Limitation. The data subject has the right to request restriction of processing in the following cases:

- (a) the data subject contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- (c) the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to the processing; in this case, the restriction shall apply for the period until it is established whether the legitimate grounds of the controller override those of the data subject.

If the processing is restricted, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the European Union or of a Member State.

Protest. Where the processing is based on the legitimate interests of Paks II Ltd or a third party, the data subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation. In such a case, the controller may no longer process the personal data, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such purposes.

Data portability. The data subject shall have the right to receive personal data concerning him or her in a structured, commonly used, machine-readable format and the right to transmit such data to another controller, provided that the processing is carried out by automated means. The data subject shall have the right to request, where technically feasible, the direct transfer of personal data to another controller.

6.2. Safeguarding the rights of the data subject, processing of the data subject's requests

Paks II. Ltd. shall inform the data subject about the processing of the data at the same time as the contact is made. The information or direct access to the information on the processing of the data can be found on the forms on which the data subject provides his/her data and the data subject can also access this detailed Information Notice, the fact and availability of which Paks II Ltd. draws the data subject's attention to.

The data subject may submit a request to exercise his/her rights to Paks II. Ltd. by any means (verbal, written). Paks II Ltd. shall examine the request without delay, decide on the execution of the request and take the necessary measures. Paks II Ltd shall inform the person concerned of the measures taken within one month. The information shall in any case include the action taken by Paks II Ltd. or the information requested by the data subject. If Paks II Ltd. refuses to comply with the request (does not take the measures necessary to comply with the request), the information shall include the legal basis for the refusal, the reasons for the refusal and the legal remedies available to the data subject.

Paks II. Ltd. shall not make the execution of the application conditional on the payment of any fee or reimbursement of costs.

If, due to the circumstances or the manner in which the request was submitted, it is not certain that the request originates from the person concerned, Paks II Ltd. may request the applicant to prove his/her eligibility or to present the request in such a way that eligibility can be clearly established.

Paks II. Ltd. will inform any recipient of the rectification, erasure or restriction of processing to whom or with which the personal data have been disclosed, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject, at his or her request, of these recipients.

6.3. Remedies

In the event of a breach of his/her rights, the data subject may request Paks II Ltd. to cease the unlawful processing, to review the processing and the rejection of the data subject's request. Paks II Ltd shall in any case investigate the data subject's complaint in this regard and inform the data subject of the outcome.

The data subject may contact the Data Protection Officer of Paks II. Ltd., Abel Kaszian, kasziana@paks2.hu

The data subject may also lodge a complaint directly with the National Authority for Data Protection and Freedom of Information (registered office: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9.; telephone: +36-30-683-5969; +36-30-549-6838; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

The data subject has the right to take legal action if his or her rights are infringed. Upon request, Paks II. Ltd. shall inform the data subject in detail about the court having jurisdiction and competence to hear the case and about the possibility of bringing legal proceedings.