

PRIVACY POLICY
IN CONNECTION WITH THE GENERAL PRIVACY POLICY FOR EMPLOYEES OF MVM
COMPANY GROUP BEING IN EFFECT AT GRAPE SOLUTIONS ZRT.
ON DATA PROCESSING REALIZED DURING THE SUPERVISION OF FITNESS FOR WORK

THE PERSONAL DATA PROCESSED UNDER THIS REGULATION

purpose of processing:	The purpose of the supervision is to check the employee's fitness for work in compliance with the current provisions of the Labour Code (Act I of 2012), the Act on work protection (Act XCIII of 1993) and other prevailing rules of law in order to ensure safe working conditions, protection of the life and health of the employee and others, plus the enforcement of other rules pertaining to work performance defined by law and internal regulations.
legal grounds of data processing:	The legal grounds of data processing in connection with the Employer's supervision are subsections (1) of Section 11. § of the Labour Code, subsection (7) point b) of Section 54. § and subsection (1) of Section 60. § of the Act on work protection, plus the legitimate interest of Employer as per the GDPR.
term of processing:	Until the time the rights and obligations arising from the supervision of the employee's fitness for work condition may be enforced the Employer reserves the personal data required for exercising such right. Accordingly all special category data recorded during the supervision the Employer shall erase after the Employer made the necessary measures based on the result of the supervision and only the fact and result of the supervision shall be archived until the end of the term open for enforcement of rights.
list if data and categories:	<ul style="list-style-type: none"> • Name of the Employee; • reason of supervision; • result of supervision (fact and extent of influence by alcohol); • other symptoms precepted during the supervision; • result of the possibly performed blood alcohol level test; • measures made in connection with the supervision.
sources:	personal data recorded by Employer during the supervisions

The recording of the above personal data are in harmony with subsection (1) of Section 11. § of the Labour Code, subsection (7) point b) of Section 54. § and subsection (1) of Section 60. § of the Act on work protection shall take place during the Employer's supervision to establish the employee's is fit to work condition. Should the subject employee deny the provision of the above personal data, in other words deny Employer' right to perform the supervision which the Employer is entitled to under law, thus hindering the supervision thereby, then the Employee may apply the legal consequences defined by the Labour Code in respect of the employee.

The legal grounds of the data processing is legitimate interest, the presentation of the legitimate interest is presented in Chapter XI of the MVM Company Group Data processing and Data Protection Handbook being in effect at Data Controller and in the prevailing Balancing Test which shall be available at the data protection officer of the Data Controller.

AUTOMATED DECISION MAKING OR PROFILING

Does the Data Controller apply these?	Information on the logic applied	What are the effects and consequences with respect to the Data Subject
No	Not relevant	Not relevant

RECIPIENT IF ANY

Name of recipients	Purpose of disclosure
Not relevant	Not relevant

WHO CAN ACCESS YOUR PERSONAL DATA?

The Supervision may only be performed by the persons authorized by the internal regulation, or in the lack of such rules the employees of the security department, thus only these persons, plus the persons exercising employer's rights in respect of the subject Employee can access the personal data recorded possibly in connection with the Supervision.

DATA SECURITY MEASURES

Data Controller stores the personal data provided by the data subject at the registered seat or registered premises of the Data Controller. Data Controller use the assistance of the data processors listed under **Recipient** for the processing of the personal data of the data subject.

All other provisions are the same as the provisions included in the Privacy Policy handed over at the time of commencing the employment/appointment, plus the provisions of the KIE-16 MVM Company Group personal data processing and data protection guideline.

TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

Name of third country or international organization	Adequacy resolutions of the EU Commission, in the lack of such resolution appropriate safeguards	Binding corporate rules (if relevant)	Derogations pertaining to specific situations (if relevant)
Not relevant	Not relevant	Not relevant	Not relevant

YOUR RIGHTS

Your rights are the same as defined in the Privacy Policy handed over at the time of commencing the employment/appointment, plus the provisions of the KIE-16 MVM Company Group personal data processing and data protection guideline.

The data subject's right to legal remedy before court, complaint addressed to the supervisory authority

Your rights are the same as defined in the Privacy Policy handed over at the time of commencing the employment/appointment, plus the provisions of the KIE-16 MVM Company Group personal data processing and data protection guideline.

DATA CONTROLLER AND DATA PROTECTION OFFICER

Please see in the Privacy Policy handed over at the time of commencing the employment/appointment, plus the provisions of the KIE-16 MVM Company Group personal data processing and data protection guideline.