

EDELMANN HUNGARY DATA MANAGEMENT HANDOUT

Data manager: Edelmann Hungary Packaging Zrt.
Company registration number of the data manager: 20-10-040223
Company seat of the data manager: 21 Fuvar street, Zalaegerszeg 8900
Representative of the data manager: Czirkli György, Chief Executive Officer

Edelmann Hungary Packaging Zrt. is the exclusive owner of all the information that has arisen during its operation. The legitimate economic interest of the Edelmann Hungary Packaging Zrt. is the efficient utilization of its workforce, the adequate protection of its assets and economic interests with proper means, and the control of compliance with laws, internal rules of operation, labor regulations, contracts and agreements. The Company has the right to control these compliances by various means and methods. The Company is obliged and entitled to handle the personal data of the employees in accordance with the provisions of the GDPR.

1. Managing and controlling the computer data, e-mail traffic, and other electronic information

Edelmann Hungary Packaging Zrt. hereby emphasizes to its employees again that the company's e-mail addresses (e-mail address generated by the Company) or the, e-mail addresses used in corporate affairs can only be used for receiving and sending corporate e-mails, and it is strictly forbidden to use them to send and receive private e-mails or to use them for private online registrations. Only the company generated e-mail addresses can be applied for corporate level communications. Edelmann Hungary Packaging Zrt. furthermore draws the attention of its employees that internet use (Internet browsing) is allowed only to the extent that is necessary in the interests of the Company and the company needs, habits and system security shall always be considered during its application. Employees are responsible for any damages that are originated by the improper use of the Internet

Edelmann Hungary Packaging Zrt. repeatedly reminds its employees within the scope of this Code of Conduct that only the Company licensed software programs are allowed to be installed on the computers of the Company, and only the Company or its contracted partners are authorized to install software programs to the computers. Employees are responsible for any damages that are originated by the improper use of the programs installed. Unauthorized programs and data will be deleted, even without prior notification.

Edelmann Hungary Packaging Zrt. has right to control the devices provided by it in order to defend its legitimate economic interests and to control its workflows. In this context, the Company is entitled, whenever the practising employer considers necessary, without prior notice to access (especially directly or indirectly) the applications used on the computers during the work and to control their content and furthermore to control the programs and data stored on the servers, and furthermore the Company is entitled to check the content of the corporate e-mails even with retrospective effect.

These controls can be executed by the Edelmann Hungary Packaging Zrt. as the practising employer, or by its contracted partner with obligation of confidentiality, or by the informatic system administrator of the Company who is entitled to control the computers and the servers, and furthermore the software programs and data stored on the company computers and servers and the corporate e-mail accounts in order to control and maintain the proper

condition and operation of the informatic system and to protect the legitimate economic interests of the Edelmann Hungary Packaging Zrt.

In the absence of an employee, the practising employer may authorize an other employee to use the computer of the absent employee, that may include access to and use of the company e-mail account and / or company e-mail correspondence of the absent employee on behalf of absent worker. In this case the fact of substitution must be revealed in the e-mail correspondences.

2. Control by camcorders installed in the area of the Company

Edelmann Hungary Packaging Zrt. controls the Company's territory by camcorders for personal and property protection. The camcorder recording is activated by movements and image content changes. Records of the camcorders are stored for maximum three days by the recording systems. The new records replace the oldest ones if the storage places are filled, and thus delete the old ones.

3. Obligation of confidentiality of the employees and of the persons working in the area of the Company

Every person working at the area of the Edelmann Hungary Packaging Zrt. are obliged to keep the business secrets that he or she has been aware of during his / her work. Additionally, they are strictly forbidden to disclose any information to an unauthorized person that they have been aware of during their job if those disclosure may have disadvantageous effect to the Edelmann Hungary Packaging Zrt. or to any other person.

All persons working at the area of the Edelmann Hungary Packaging Zrt. must sign a Nondisclosure Agreement in order to protect the data owned by the Company. The signatories confirm by signing the Nondisclosure Agreement that any information that may arise in the course of their work, including business secrets, and any business, commercial or technical information (such as information related to the business partners, contracts, production data, facts, etc.) or intellectual property related information they

- keep confidential,
- do not disclose to any third party,
- do not make any statements about them to any third party (and /or the media) without the written approval of the information owner,
- do not apply them for their own or for other person's use neither in full nor in parts.

The Collective Agreement stipulates what information of the Company is considered to be particularly confidential.

All persons working at the area of the Edelmann Hungary Packaging Zrt. understood that their obligation of confidentiality stays unchanged even if their employment or other legal relationship to work is terminated.

All persons working at the area of the Edelmann Hungary Packaging Zrt. understood that legal consequences specified by the Civil Code, by the Labour Code and by the Collective Agreement can be applied against them in case of breaching the obligation of confidentiality.

4. Handling the personal data of the employees

Edelmann Hungary Packaging Zrt. manages the personal data of its employees in order to comply with its legal obligations arising from the employment relationship and the related legal obligation, in accordance with Act CXII of 2011 on Informational Self-determination and Freedom of Information and with the Regulation (EEC) No 2016/679 of the European Parliament and of the Council (GDPR).

Edelmann Hungary Packaging Zrt. may disclose the personal data of its employees to any third party only in a statutory case or on the basis of the approval of the employee.

Edelmann Hungary Packaging Zrt. hands over the personal data of the employees, that are stored by the department of human resources, to the internal and / or external employee(s) and / or entrepreneur(s) responsible for the bookkeeping / payroll / auditing activities, and to the authorities and bodies to which Edelmann Hungary Packaging Zrt is obliged to report the employment relationship (eg NAV, OEP), to fulfil its employment related obligations. The purpose of the data supply is to fulfil its reporting obligations and to perform its payroll accounting related tasks. Employees get information about the internal and / or external employee(s) and / or contractor(s) / agent(s) entrusted with the respective bookkeeping / payroll / auditing tasks.

Edelmann Hungary Packaging Zrt. furthermore hands over the personal data of its employees to the person / institution responsible for executing the occupational medical examinations in order to make the agent able to carry out the occupational health examination related activities. Employees are informed about the specific person / institution entrusted with executing the occupational health examination.

Edelmann Hungary Packaging Zrt. hands over the personal data of its employees to the employee / authorized person / institution responsible for the respective work safety to enable the employee / authorized person or institution to perform his / her work safety related activities. Employees are informed about the specific employee / person / institution entrusted with the work safety related activities.

Edelmann Hungary Packaging Zrt. hands over certain personal data of the employees to its parent company, the Edelmann GmbH (owner). The parent company operates within the European Union and meets the current EU data protection requirements. This reporting is necessary for the proper identification of the employees and thus for the proper operation of the group.

Edelmann Hungary Packaging Zrt. may use the personal data of its employees for statistical purposes in a non-personally identifiable manner and may submit them to public institutions under statutory or other regulatory requirements without the employees' separate consent.

Zalaegerszeg, 24 May 2018



Czirk György

Chief Executive Officer