4.13 Data processing related to contractual partners and tenderers participating in a procurement process (communication, implementation of relevant contract, data processing related to persons involved in performance as well as students supplied by student job centres).

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
1. Processing data of contractual partners' contact persons and persons involved in the performance of the contract for the purpose of fulfilling the contract (implementation on a daily level) and exercising rights related to the contract. This includes, for example, processing the contact persons' postal address and other contact details indicated within the range of data, the instructions given by the contact persons acting on behalf of the parties (for example, in order to make payments), or sending official notifications using contact details and information related to contractual rights and obligations. The SAP system holding records	Depend on whether the contract is concluded with the data subject (e.g. self-employed) or with another organisation: GDPR, Article 6(1)(b) – performance of a contract concluded with the data subject / GDPR, Article 6(1)(f) – the legitimate interest of Egis and the contracting organisation : the fulfilment of contractual obligations, exercising rights, and coordinating the cooperation of the parties. Providing personal data is a contractual requirement; without personal data Egis is unable to enter into and perform the contract.	Name and contact details (e-mail, telephone number, mobile number, fax number) of contact persons of contractual partners and of persons involved in the performance, and communication containing any personal data related to the contract (e.g. communication received from the contact person or any natural person acting on behalf of the partner).	**5 years** from the termination of the contractual relationship (Civil Code, Section 6:22 (1)). **Regarding the fulfilment of tax obligations: 5 years** from the last day of the calendar year in which a tax return, data submission or notification should have been made or, in the absence of this, tax should have been paid (Act XCII of 2003 on the Rules of Taxation, Sections 78 (3) and 202 (1)). **For accounting documents: 8 years** (Act C of 2000 on Accounting, Sections 168 to 169). **Persons entitled to access data at Egis**: the competent business departments according to the contract. **Data processors:**

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
of contracts is operated by companies involved as data processors.			**SAP Hungary Kft.** (1031 Budapest, Záhonyi u. 7.; ralph.van.uden@sap.com). Period of activity: open-ended contract. **EasyCon Kft.** (1138 Budapest, Váci út 135-139. C épület; info@easycon.hu). Period of activity: 30.10.2020. **DXC Technology Magyarország Kft.** (1114 Budapest, Bartók Béla út 43-47.). Period of activity: open-ended framework contract; performance is not continuous.
2. Processing data of contact persons of contractual partners and of persons involved in the performance for compliance purposes related to the contract or any other actions related to the fulfilment of the contract including finding judical remedy necessary for ensuring contractual rights.	The legal ground of data processing is the legitimate interest of Egis (GDPR, Article 6 (1)(f)). **The legitimate interest:** processing compliance issues related to the contract or performing any other actions related to the performance of the contract including finding judical remedy necessary for	Name and contact details (e-mail, telephone number, mobile number, fax number) of contact persons of contractual partners and of persons involved in the performance, and communication containing any personal data related to the contract (e.g. communication received from the contact person	**5 years** from the termination of the contractual relationship (Civil Code, Section 6:22(1)). **Regarding the fulfilment of tax obligations: 5 years** from the last day of the calendar year in which a tax return, data submission or notification should have been made or, in the absence of this, tax should have been paid (Act XCII

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
The SAP system holding records of contracts is operated by companies involved as data processors.	ensuring contractual rights.	or any natural person acting on behalf of the partner).	of 2003 on the Rules of Taxation, Sections 78 (3) and 202 (1)). **For accounting documents: 8 years** (Act C of 2000 on Accounting, Sections 168 to 169). **Persons entitled to access data at Egis**: the competent business departments according to the contract. **Data processors:** **SAP Hungary Kft.** (1031 Budapest, Záhonyi u. 7.; ralph.van.uden@sap.com). Period of activity: open-ended contract. **EasyCon Kft.** (1138 Budapest, Váci út 135-139. C épület; info@easycon.hu). Period of activity: 30.10.2020. **DXC Technology Magyarország Kft.** (1114 Budapest, Bartók Béla út 43-47.). Period of activity: open-ended framework contract; performance

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
			is not continuous.
3. Assessing the professional competence of colleagues intended to be involved or taking part in the performance of organisations which are providing service for Egis in the course of Egis's procurements or of tendering organisations participating in the related procurement process as well as students supplied by student job centres.	GDPR, Article 6(1)(f) – the legitimate interest of Egis. **The legitimate interest:** to ensure transparent operation and verify the secure and corruption-free functioning of the corporate structure. To this end, Egis must be able to subsequently demonstrate its selection criteria applied in the course of procurements for its internal control. The process is regulated by a separate internal procedure: CEO Resolution 25/2017 on the General Rules of Procurement at Egis. Point 4.3.7. j) of the Resolution, for example, provides that Egis may require proof of professional competence for the minimum content elements of the tender. Processing the data is a prerequisite of concluding and	Data processing includes, for example, a personal interview with data subjects in order to ascertain the data subject's competence and professional competence, and reviewing documents supporting professional competence with regard to persons intended to be involved in performance (e.g. certificates, qualifications, professional CVs, entitlement to perform special technical tasks). **Data subjects:** Persons intended to be or currently involved in performance by the contractual partner (including persons participating in tendering and, following selection, any other newly involved person in the course of performing the contract) as well as students supplied by student job centres.	Egis will retain the tender documentation submitted by tenderers in the course of the procurement procedure (including non-winning tenders) also after the procurement procedure has been closed. Period of retention (Civil Code, Section 6:22(1)): for non-winning tenders **5 years** following the conclusion of tendering; for winning tenderers **5 years** following the termination of the contractual relationship established with the chosen partner. The purpose of the retention of data is to enable Egis to satisfactorily verify the legality of the selection criteria in the course of potential internal audit, legal dispute or official request. If the tendering documentation (and the personal data contained in it) is subject to an ongoing legal dispute, official procedure or the enforcement of a warranty/

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
	maintaining the relevant contract.	**Range of personal data:** Personal data disclosed by the data subject (e.g. name, information about qualifications, professional background, professional experience, any personal data given by the data subject in the CV or featured in the document verifying professional competence).	guarantee claim, it will only be erased after the conclusion of the official procedure, legal dispute or the enforcement of the warranty/guarantee claim. **Entitled persons to access data at Egis:** Egis colleagues of business departments performing, requiring or using the given procurement, colleagues of the Legal Department, colleagues of the Internal Audit Department (in the event of the internal audit of the procurement procedure).
4. Inspecting the presence of persons involved in performance by external contractual partners providing service for Egis on Egis premises as well as students supplied by student job centres (and thus contractual performance) with the help of the data recorded by the registered passes provided by Egis.	GDPR, Article 6(1)(f) – the legitimate interest of Egis and the contractual partner. **The legitimate interest of Egis:** to inspect the contractual performance of the contractual partners (e.g. a person acting on behalf of the partner was present at a given time on Egis premises in order to fulfil the task assigned to them, and in view of	**Data subjects:** Persons involved in performance by the contractual partner as well as students supplied by student job centres. The contractual partner as well as the student job centre transfers the list of names of the above persons to Egis and Egis issues passes in their names. In the event of a change in persons, the	**5 years** from the termination of the legal relationship existing with the contractual partner (Civil Code, Section 6:22(1)) except if there is an ongoing official procedure, legal dispute or a warranty/guarantee claim awaiting enforcement, in which case the data will be erased after the conclusion of the official procedure, legal dispute or the enforcement of the warranty/

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
	this inspecting other data related to performance, e.g. number of hours or other period specified in the contract), ensuring administration and issuing/ inspecting certificates of performance. Egis also uses the data recorded by the passes for security purposes. For details in connection with this (purpose, legal grounds, range of data, data retention period, entitled persons to access data, potential data transmissions), see Appendix 4.6 (*Data Processing for safety and security purposes*), section 1. Processing the data is a prerequisite of concluding and maintaining the relevant contract.	contractual partner shall update the list of names. **Data recorded by the entry system:** Data of movements related to each registered pass (date, time and place of entry/exit) as well as the name of the person entering, the name of the department where this person is performing work on Egis premises and the name of the employer company. Using the above data, Egis inspects the number of persons concerned and the duration of work performed by them. Range of data additionally processed by Egis: total number of hours of service provided for Egis in the current month, and any other performance elements specified by the contract that can be expressed as a figure (e.g. actual performance of the service, performance of service complying with the number of hours stipulated by contract).	guarantee claim. **For accounting documents: 8 years** (Act C of 2000 on Accounting, Sections 168 to 169). **Authorised to access at Egis:** designated colleagues of the business department performing the inspection of the service and/or authorised to issue the certificate of performance, Security Department of Egis. **Data transmission:** Egis may transmit data for the purpose and legal grounds indicated in this section to the given contractual partner/student job centre. **Acting as an independent data controller:** **Fürge Diák Piackutató Szolgáltató Iskolaszövetkezet** (9700 Szombathely, Belsikátor 3. 1.em. 2., info@furgediak.hu).

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
5. Processing relating to B2B business relationships, potential business opportunities and contact details in the CRM system The purposes of the processing are to establish, organise, maintain and develop Egis's existing and potential B2B business relationships, facilitate communication between Egis and its existing and potential business partners, and ensure the transparent and efficient monitoring of B2B commercial processes. The processing includes in particular: • maintaining records of the contact persons and representatives of existing and potential business partners and persons participating in business decision-making; • monitoring potential	**Article 6(1)(f) of the GDPR:** the legitimate interests of Egis and, where applicable, the organisation that has or intends to establish a relationship with Egis. **The legitimate interests of Egis:** establishing, organising, maintaining and developing B2B business relationships; ensuring continuity in communications; transparently monitoring business opportunities and sales processes; documenting the background to business communications and decisions; and efficiently planning and using business resources.	**Data subjects:** Contact persons and representatives of Egis's existing and potential business partners and other organisations involved in B2B business relationships. A contact person typically acts on behalf or in the interests of an organisation with which Egis has a business relationship or intends to establish a business relationship. Egis limits the processing to data necessary for the professional relationship and uses the data exclusively in connection with the data subject's position, professional activities or the relevant business relationship. **Categories of personal data:** • the data subject's name, position, job title, details of the organisation represented by the data subject, business contact details and the URL of	**Retention period:** Egis retains personal data processed in the CRM system for the duration of the relevant business relationship and for a **maximum of five years following its closure.** Where there is an existing contractual business relationship, the five-year retention period begins on the date on which the related contractual relationship terminates. If personal data are necessary in connection with an ongoing legal dispute, administrative or regulatory procedure, complaint, compliance investigation, or the establishment, exercise or defence of a legal claim, Egis may retain the data until the relevant procedure or legal claim has been finally concluded. **Persons authorised to access the data within Egis** Within Egis, personal data may be accessed only by employees who

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
business opportunities and expressions of interest, as well as the related business history, proposals, negotiations and follow-up actions; • documenting business communications and the relevant circumstances of personal, telephone, electronic or other interactions with contact persons; • managing and documenting enquiries, proposals, contracts and other business documents relating to the establishment and maintenance of business relationships.		the data subject's publicly available LinkedIn profile. • Information relating to the nature, status and history of a business relationship, expression of interest or opportunity, proposals, negotiations and contracts, and the date, method and business-relevant content of communications. • A rating of the relevance and urgency of a business opportunity, used to support contact management and the management of business opportunities. The rating primarily concerns the existence and priority of the business opportunity rather than an assessment of the personal characteristics of the data subject.	require access for the performance of tasks relating to B2B commercial processes, business relationships, contracts, sales opportunities, system administration, compliance, legal matters or information security. This primarily includes the relevant employees of the B2B Sales Development Department. **Data processors** Egis uses the following data processors in connection with the CRM system: **SFDC Ireland Ltd. (**Registered office: Salesforce Tower Dublin, North Dock, Dublin 1, D01 W2Y3, Ireland E-mail: privacy@salesforce.com) Service: provision of the Salesforce cloud-based customer relationship management system The data are stored in the European Union data centre region of the Salesforce Hyperforce infrastructure.

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
		The following may also be processed in the CRM system: • e-mails sent from the CRM system or transferred from Outlook to the CRM system at the user's discretion, together with their attachments; • notes and comments relating to business communications and Chatter posts made within the CRM system; • proposals, business calculations and forecasts, project and contractual documents, confidentiality agreements and other related business documents; • links providing access to documents stored in SharePoint. The CRM system may also contain free-text fields and Chatter posts. Egis employees	**UC CRM Solutions Zrt.** Address: 1117 Budapest, Dombóvári út 26. E-mail: info@united-consult.hu The data processor assists Egis with the operation and support of the CRM platform.

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
		may record in these fields and posts only professional information that is necessary for managing the relevant business relationship. **Sources of personal data:** Personal data may be obtained: • directly from the data subject, including from an e-mail sent for this purpose or a business card; • from the organisation represented by or employing the data subject, typically from a contract; • from an Egis employee, at a professional event or in the course of establishing a business relationship; or • from publicly available professional sources, particularly a company website or LinkedIn profile.	

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
		Use of LinkedIn Sales Navigator Advanced Plus Egis uses the LinkedIn Sales Navigator Advanced Plus service to identify B2B business relationships, verify the accuracy of contact details, obtain professional information relevant to the business relationship and support communications. Where the service is integrated with the CRM system, contact, company and business activity data may be transferred between the two systems. Such data may include, in particular, data relating to saved persons and companies, changes to professional profile details, InMail activities, notes and tags, and viewing data relating to shared documents. Based on the company and contact data held in the CRM system, LinkedIn may also	

Purpose of processing	Legal grounds of processing	Range of data	Data retention time, rights of access, recipients of data transmissions
		display recommendations and compare such data against its own database. Egis uses only LinkedIn data that are necessary in connection with the data subject's professional activities and the relevant B2B business relationship. Egis does not record in the CRM system private information that is irrelevant to the business relationship. Recording the URL of a LinkedIn profile does not, in itself, constitute a legal basis for sending electronic marketing communications. LinkedIn acts as an independent controller in respect of processing carried out within the framework of its own services.	