

Privacy Notice (“Notice”)

- on data processing in relation to COVID-19 epidemic -

Effective from 27.03.2020 until withdrawn

Last update: 06.08.2020.

Purpose of data processing	Legal basis of data processing	Scope of processed data	Data retention period, access rights, recipients of data transfers
<p>1. Processing statements necessary to enter the territory of Egis (hereinafter the “statement”).</p> <p>Given the spread of COVID-19 epidemic - hereinafter the “virus” or “coronavirus” - it is the purpose of Egis to ensure a healthy and safe work environment for its employees and take the necessary measures to protect against the virus.</p> <p>To this end, Egis requests persons entering its territory to make a statement prior to entry on possible coronavirus infection and, if necessary, refuses entry.</p>	<p>1. Egis as Employer is obliged to ensure the conditions of a safe work environment for its employees and contract partners working at its registered seat, branches and sites (hereinafter the “sites”) in order to comply with the following legal obligations.</p> <p>These legal obligations: The legal obligation under Act XCIII of 1993 on occupational safety and health and Act I of 2012 on the labour code (the “Labour Code”). Pursuant to Section 51 (4) of the Labor Code, Egis as employer ensures the requirements for non-hazardous and safe working conditions.</p> <p>Accordingly, the legal basis of data processing is that data processing is necessary for compliance with a legal obligation to which the controller is subject (Article 6(1) (c) of the GDPR).</p> <p>2. Furthermore it is a legitimate interest of Egis under Article 6(1) (f) of the GDPR to take the</p>	<p>Scope of data subjects: Persons entering the territory of Egis (<i>excluding employees of Egis, employees placed to Egis by agencies, pupils and students involved in the provision of services to Egis under a contract concluded with a school association, and persons employed under a student contract, as well as natural persons engaged by Egis - the relevant internal data processing notice – Privacy Policy - of Egis applies to these persons</i>).</p> <p>Scope of processed data: Name, address (for one-off identification) and YES / NO answer to exposure to the circumstances set out in the statement <u>in effect from time to time</u> (on the basis of which possibility of coronavirus infection can be inferred).</p> <p>The content of the statement may be continuously updated in view of the epidemiological situation, so the exact</p>	<p>Data retention period: Egis will not keep the statement; it will be destroyed immediately after examination.</p> <p>Egis shall keep the data only if possibility of infection can be inferred from them, until the competent authorities confirm the end of the new type of coronavirus epidemic or the risk of infection with the new type of coronavirus. (Criteria for determining the date: as long as the risk of infection may persist and Egis as employer must continue to take the necessary and proportionate measures to protect the health of employees).</p> <p>In each case Egis will consider whether further data retention is justified in the event that the data is necessary for Egis in legal proceedings. For example, you refuse to make a statement or your possible infection can be established from the statement. In this case the data retention period: 5 years in civil law matters (limitation period set out in Section 6:22 (1) of the Civil Code), or in the case of enforcement of a claim, the</p>

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	<p>necessary measures to protect the health of employees and maintain business continuity (e.g. by making sure that only non-infected persons enter its territory).</p> <p>In the current epidemiological situation, it is also extremely important to ensure the continuity of pharmaceutical production and to protect the health of colleagues who play a key role in this.</p> <p>3. In respect of health data - <i>as this data constitute special categories of personal data ('sensitive data') under the provisions of the GDPR and can therefore be processed on special legal basis</i> - the legal basis of data processing is Article 9(2) (b) of the GDPR, carrying out the obligations in the field of employment (ensuring a healthy and safe work environment for its employees, see Section 51 (4) of Act I of 2012 on the Labour Code), which can be achieved by restricting access of persons who may be infected with the virus to its sites.</p>	<p>scope of data is not listed in this Notice.</p> <p>The fact of being subject to any further action that may be taken on the basis of the above (e.g. refusal of entry, possible civil consequences - if refusal of your entry affects the service provided to the Egis).</p>	<p>final and conclusive termination of the proceedings.</p> <p>Persons authorised to access: The above data is accessed within the Egis by the staff of the Security Department General, who decide on the basis of the content of the statement whether the relevant individual may enter the territory of Egis. The refusal of entry and the reason for it will be notified to your host department, which may, as necessary, notify your employer or the company employing you - e.g. replacement must be provided.</p> <p>A copy of the report taken on the exposure to the risk of COVID-19 infection will be handed over to you and forwarded to your host department by the staff of the Security Service (for further action, such as arranging a replacement in the case of external service providers).</p> <p>If an action is taken (e.g. due to a refusal to provide data), the competent staff of the host department and the Legal Division may also have access to the data related to the action.</p> <p>In the operation of the security service, in the completion, collection and forwarding of pre-entry statements and reports, Egis is assisted by Future Security Zrt. (1148 Budapest, Fogarasi út 5., mail@future-</p>

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			<p>security.hu) as data processor (security service).</p> <p>The management of Egis is also entitled to access the data (without access to personal data) and the records kept on it, as well as the findings that can be deduced from them (e.g. how many persons may be infected) in order to be able to initiate further action.</p> <p>Egis may, if necessary, inform the epidemiological or other relevant authority or the healthcare institution acting in relation to the coronavirus that it processes data for the purpose specified in this Notice.</p> <p>At the request of the epidemiological or other authority or the healthcare institution or staff acting in relation to the coronavirus Egis may then provide personal health data to the authority or healthcare institution.</p>
<p>2. Data processing in relation to measurement of body temperature in the course of entry to the territory of Egis.</p> <p>Given the spread of COVID-19 epidemic - hereinafter the “virus” or “coronavirus” - it is the purpose of Egis to ensure a healthy and safe work environment for its employees and</p>	<p>The legal basis of processing of personal data other than health data: Article 6(1) (f) of the GDPR – legitimate interest of Egis.</p> <p>The primary interest of Egis is to provide a non-hazardous work environment and safe working conditions for its employees and external partners providing services at its sites.</p>	<p>Scope of data subjects: Persons entering the territory of Egis (<i>excluding employees of Egis, employees placed to Egis by agencies, pupils and students involved in the provision of services to Egis under a contract concluded with a school association, and persons employed under a student contract, as well as natural persons engaged by Egis -</i></p>	<p>Data retention period: Egis shall keep the data only if possibility of infection can be inferred from them, until the competent authorities confirm the end of the new type of coronavirus epidemic or the risk of infection with the new type of coronavirus. (Criteria for determining the date: as long as the risk of infection may persist and Egis as employer must continue to take the necessary and</p>

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<p>take the necessary measures to protect against the virus.</p> <p>To this end, Egis orders that the body temperature of persons entering its territory be taken prior to entry so that it can be established whether they may be infected with the coronavirus or not. Only a person whose body temperature, measured by an infrared, digital, contactless forehead thermometer, is below 37.5 °C, may enter the registered seat and sites of Egis. Body temperature measurements are performed by the staff of the Security Service with an infrared, digital, contactless forehead thermometer before entry through revolving gates or passing through barrier gates.</p> <p>The Security Service will immediately inform you orally about the result of the body temperature measurement.</p> <p>If your body temperature is below 37.5 °C, you can enter the territory of Egis, no measurement documentation will be made.</p> <p>If your body temperature is 37.5 °C or above, the staff of the Security Service takes two control measurements. If the result of</p>	<p>In the current epidemiological situation, it is extremely important to ensure the continuity of pharmaceutical production and to protect the health of colleagues who play a key role in this. Egis therefore has a legitimate interest in checking persons entering its headquarters, sites and branches prior to entry for possible infection with the coronavirus. The purpose is (i) to prevent colleagues working at Egis sites or providing continuous services from being infected and (ii) to ensure business continuity.</p> <p>In respect of health data - as deductions can be made to your health condition from the body temperature measurement - the legal basis of data processing is Article 9(2) (b) of the GDPR, carrying out the obligations in the field of employment (ensuring a healthy and safe work environment for its employees, see Section 51 (4) of Act I of 2012 on the Labour Code), which can be achieved by restricting access of persons who may be infected with the virus to its registered seat, sites or branches.</p>	<p><i>the relevant internal data processing notice - Privacy Policy - of Egis applies to these persons).</i></p> <p>The data recorded in the report on possible infection revealed in the course of the measurement of body temperature (i.e. the fact of body temperature above the value determined by Egis or the fact of refusal to have body temperature measured) (data necessary to establish or to identify the above facts).</p> <p>In the case of relevant individuals not affected by the above, no report will be issued, no data will be recorded.</p> <p>The fact of being subject to any further action taken on the basis of the above (e.g. refusal of entry, possible civil consequences - if refusal of your entry affects the service provided to the Egis).</p>	<p>proportionate measures to protect the health of employees).</p> <p>In each case Egis will consider whether further data retention is justified in the event that the data is necessary for Egis in legal proceedings. For example, you refuse to have your body temperature taken or your exposure can be established from the measurement of body temperature. In this case the data retention period: 5 years in civil law matters (limitation period set out in Section 6:22 (1) of the Civil Code), or in the case of enforcement of a claim, the final and conclusive termination of the proceedings.</p> <p>Persons authorised to access:</p> <p>The above data is accessed within the Egis by the staff of the Security Division, who decide on the basis of the body temperature measurement whether the relevant individual may enter the territory of Egis. The refusal of entry and the reason for it will be notified to your host department, which may, as necessary, notify your employer or the company employing you - e.g. replacement must be provided.</p> <p>If your body temperature is 37.5 °C or above after the control measurements, the staff of the Security Service will issue a report, a copy of which will be handed</p>

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<p>repeated measurements is 37.5 °C or higher, you will not be permitted to enter the territory of Egis.</p> <p>The prohibition to enter applies to one business day, so you may enter Egis territory on the next business day if you comply with the provisions of this Notice, unless otherwise advised by a physician or instructed by the management.</p>			<p>over to you, and the staff of the Security Service will keep it for later proof for the action.</p> <p>If an action is taken (e.g. due to a refusal to have body temperature taken or to provide data), the competent staff of the host department and the Legal Division may also have access to the data related to the action.</p> <p>In the measurement of body temperature and completion, collection and forwarding of reports, Egis is assisted by Future Security Zrt. (1148 Budapest, Fogarasi út 5., mail@future-security.hu) as data processor (security service).</p> <p>The management of Egis is also entitled to access the data (without access to personal data) and the records kept on it, as well as the findings that can be deduced from them (e.g. how many persons may be infected) in order to be able to initiate further action.</p> <p>Egis may, if necessary, inform the epidemiological or other relevant authority or the healthcare institution acting in relation to the coronavirus that it processes data for the purpose specified in this Notice. At the request of the epidemiological or other authority or the healthcare institution or staff acting in relation to the coronavirus Egis may then</p>

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			provide personal health data to the authority or healthcare institution.
<p>3. Screening of employees of external partners who provide continuous services at Egis sites - who are more likely to be exposed to infection - (if certain indicators are present) with tests suitable for the detection of coronavirus.</p> <p>A detailed testing protocol (the “Protocol”) can be found at Egis gate-keepers and at the testing site on paper.</p>	<p>Egis is under the legal obligation to provide its employees with non-hazardous and safe work requirements and intends to provide this to the persons employed by its service partners in its territory.</p> <p>1. In order for Egis to be able to meet this obligation, it has a legitimate interest in introducing measures to protect the health of employees and those employed by its service providers (such as the application of the tests set out in this purpose where appropriate).</p> <p>The legal basis for this data processing is provided by Article 6(1) (f) of the GDPR, the enforcement of legitimate interest of Egis, which includes:</p> <p>(i) The primary interest of Egis is to establish the conditions for conducting tests necessary to promote a non-hazardous work environment and safe working conditions and to protect the health of exposed workers and outsiders, to seek to prevent infections and to be able identify persons potentially affected by infection and can pull them out of the community as soon as possible.</p>	<p>Name, address of the relevant individual, type of test, sample suitable for the test (for blood sample serology, upper respiratory sample for RT-PCR), date of sample submission, test result (positive or negative) and any additional data recorded in the protocol.</p> <p>Egis sets out the scope of additional measures taken in relation to data processing. For example, recording if a relevant individual indicates that he/she has coronavirus symptoms; recording precautions taken in relation to the person suspected of being infected (e.g. refusal of entry, isolation, being sent home, contact detection, disinfecting cleaning); monitoring of test results and the condition of the relevant individual; in the case of a positive test, transmitting the data to the competent health authority.</p> <p>Egis does not process medical history data or medical records; this is why we ask the relevant individual to inform us only of the facts recorded in the protocol.</p>	<p>Persons authorised to access:</p> <p>We will inform your Egis contact person (for work organization purposes) and your employer about the fact that you are being tested and about the test result. The contacts of the relevant individual may also become learn about your possible infection (without becoming aware of any further information).</p> <p>Without the knowledge of personal data, the management of Egis is also entitled to learn how many people have been infected in Egis / what measures have been taken in order to be able to propose taking further measures / mitigating existing ones.</p> <p>Egis retains the data until, on the basis of the rulings of the competent authorities, Egis considers that the coronavirus epidemic or the risk of infection with the coronavirus no longer justifies the retention of the data. This date may not necessarily be identical to the cessation of the official emergency, as nevertheless the risk of infection may persist and Egis as employer must continue to take the necessary and proportionate measures to protect the health of employees.</p>

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	<p>(ii) In the current epidemiological situation, it is extremely important to ensure business continuity and the continuity of pharmaceutical production and to protect the health of colleagues and employees of service partners who play a key role in this.</p> <p>2. In respect of health data the legal basis for data processing is Article 9(2) (b) GDPR, carrying out the obligations in the field of employment.</p> <p>Egis is constantly monitoring regulatory environment and adapts its measures to it.</p>		<p>In each case Egis will consider whether further data retention is justified in the event that the data is necessary for Egis in legal proceedings. For example if the relevant individual disputes the lawfulness of the measures taken based on the data. In this case the data retention period: 5 years in civil law matters (limitation period set out in Section 6:22 (1) of the Civil Code), or in the case of enforcement of a claim, the final and conclusive termination of the proceedings.</p> <p>Further data controller: Egis will transfer the personal data to PentaCore Lab Healthcare Service Korlátolt Felelőségű Társaság (1094 Budapest, Bokréta utca 5.) for the evaluation of the test. PentaCore Lab acts as an independent data controller in accordance with its own data processing terms and conditions; Egis does not have the right to instruct and control in this regard.</p> <p>Data processing partner: Occupational healthcare provider (occupational physician) used by Egis in connection with the performance of examinations: SWISS MEDICAL SERVICES Egészségügyi Szolgáltató Korlátolt Felelőségű Társaság (1092 Budapest, Kinizsi u. 22. fszt. 4., contacts: dr. András Kirschner, Managing Senior Physician,</p>

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			<p>dr.kirschner@swissclinic.hu; dr. Gertrúd Emmer, Site Managing Physician. emmer.gertrud@swissclinic.hu.)</p> <p>In the course of certain activities, the occupational healthcare provider acts as a data processor according to the instructions of Egis, Egis ensures, for example, that a testing environment is set up. However, the occupational healthcare provider may in certain cases act as an independent data controller, in accordance with the professional rules applicable to it. In the course of testing it processes the following personal data: social security number, name, gender, date of birth, mother's maiden name, postal code, home/city, home address, telephone number, email address, PentaCore Lab patient consent and privacy statement status, complaint, its circumstances, contact definition, test result.</p> <p>The test result is forwarded by the PentaCore Lab to the occupational healthcare, which will then act in accordance with the applicable professional rules.</p> <p>Data transfer: In the event of a positive test, PentaCore Lab will inform the Public Health Centre, who may request additional information.</p>

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<p>4. In order to screen for coronavirus infection, special measures taken against persons providing services to Egis (e.g. service engineers) who are non-Hungarian citizens and who come from abroad before entering the territory of Egis.</p> <p>In addition to the measures set out in this Notice, from non-Hungarian nationals arriving from abroad Egis requests a document (in English or Hungarian) issued over the past 5 days, 48 hours apart that contains the results of 2 negative coronavirus tests, to prove that the relevant individual did not contract the coronavirus. Without this proof, the relevant individual cannot enter the territory of Egis!</p> <p>Egis only welcomes foreign partners in urgent cases, e.g. to conduct a quality assurance audit, or if a machine essential for the manufacture of a drug breaks down and warranty repairs can only be performed by an engineer of the foreign partner.</p> <p>Egis gives its partners prior notice of the measure.</p>	<p>1. Egis as Employer is obliged to ensure the conditions of a safe work environment for its persons working at its sites in order to comply with the following legal obligations. These legal obligations: The legal obligation under Act XCIII of 1993 on occupational safety and health and Act I of 2012 on the labour code (the “Labour Code”). Pursuant to Section 51 (4) of the Labor Code, Egis as employer ensures the requirements for non-hazardous and safe working conditions. Accordingly, the legal basis of data processing is that data processing is necessary for compliance with a legal obligation to which the controller is subject (Article 6(1) (c) of the GDPR).</p> <p>2. Furthermore it is a legitimate interest of Egis under Article 6(1) (f) of the GDPR to take the necessary measures to protect the health of employees and maintain business continuity (e.g. by making sure that only non-infected persons enter its territory).</p> <p>Egis must keep in mind that there are still (sometimes in a high) number of registered new cases abroad, so the possible infection of non-Hungarian</p>	<p>The scope of data on the document containing the results of negative coronavirus tests of the relevant individual, which can be both personal and health data.</p> <p>Please do not forward a positive test result to Egis. If such data or any data beyond this scope is received by Egis, it will be deleted immediately and will not be processed by Egis.</p>	<p>The contact person of the foreign partner within Egis is entitled to view the certificate and does not transfer or make the data available to other persons. Egis processes the data only for the time of viewing (checking) and does not transfer the data. Documents received electronically will also be deleted after checking.</p> <p>We ask our partners to keep the certificate presented in case it is necessary for any epidemiological data provision.</p>

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	<p>citizens from abroad may pose a risk to the health of those working in Egis.</p> <p>3. In respect of health data - as this data constitute special data under the provisions of the GDPR and can therefore be processed on special legal basis - the legal basis of data processing is Article 9(2) (b) of the GDPR, carrying out the obligations in the field of employment (ensuring a healthy and safe work environment for its employees, see Section 51 (4) of Act I of 2012 on the Labour Code), which can be achieved by restricting access of persons who may be infected with the virus to its sites.</p> <p>Measures of Egis are in line with Government Decree 341/2020 (VII. 12.) promulgated by the Government of Hungary on travel restrictions during the period of epidemiological preparedness.</p>		
<p>5. In order to screen for coronavirus infection, the imposition of a reporting obligation on non-Hungarian citizens arriving from abroad who provide services in the Egis territory for more than 3 days, if they experience symptoms of coronavirus infection.</p>	<p>1. Egis as Employer is obliged to ensure the conditions of a safe work environment for the persons working at its registered seat, branches and sites (hereinafter the “sites”) in order to comply with the following legal obligations. These legal obligations: The legal obligation under Act</p>	<p>The name and the symptoms reported by the relevant individual, his/her contact (host) person at Egis.</p> <p>Egis can only conclude coronavirus infection based on the occupational health physician’s medical opinion.</p>	<p>The Egis contact (host) person of the affected, in case of involvement (possible infection), other organizational units (only limited to purpose, where possible without personal data) e.g. conducting contact research, evacuating and disinfecting a building.</p> <p>In the event of an occupational medical</p>

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<p>For possible symptoms, please view the Hungarian protocol or the following site in English: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/question-and-answers-hub/q-a-detail/q-a-coronaviruses#:~:text=symptoms</p> <p>This clause has been expressly adopted for non-Hungarian citizens arriving from abroad. With this information, Egis is trying to make up for any incomplete knowledge about the virus and its symptoms.</p> <p>If the relevant individual has symptoms, Egis may deny entry.</p>	<p>XCIII of 1993 on occupational safety and health and Act I of 2012 on the labour code (the “Labour Code”). Pursuant to Section 51 (4) of the Labor Code, Egis as employer ensures the requirements for non-hazardous and safe working conditions.</p> <p>Accordingly the legal basis of data processing is that data processing is necessary for compliance with a legal obligation to which the controller is subject (Article 6(1) (c) of the GDPR).</p> <p>2. Furthermore it is a legitimate interest of Egis under Article 6(1) (f) of the GDPR to take the necessary measures to protect the health of employees and maintain business continuity (e.g. by segregating the persons noticing symptoms as soon as possible and disinfection).</p> <p>Egis must be aware of that there are still (sometimes in a high) number of registered new cases abroad, so the possible infection of non-Hungarian citizens from abroad may pose a risk to the health of those working in Egis.</p> <p>In the current epidemiological situation, it is also extremely important to ensure the continuity</p>	<p>In the event of the possibility of infection, Egis will consider isolation and may also conduct contact search, and request information from the relevant individual to that effect.</p>	<p>examination, the occupational health physician will act in accordance with his/her own professional rules, informing Egis of the possibility of infection, so that Egis can take the necessary measures (isolation, contact research, etc.).</p> <p>Egis will inform its foreign partner if the relevant individual cannot provide the contracted service (only indicating this fact and without transferring any further personal data).</p>

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	<p>of pharmaceutical production and to protect the health of the persons who play a key role in this.</p> <p>3. In respect of health data - <i>as this data constitute special data under the provisions of the GDPR and can therefore be processed on special legal basis</i> - the legal basis of data processing is Article 9(2) (b) of the GDPR, carrying out the obligations in the field of employment (ensuring a healthy and safe work environment for its employees, see Section 51 (4) of Act I of 2012 on the Labour Code), which can be achieved by obliging non-Hungarian citizens arriving from abroad who provide services at the sites of Egis to report.</p>		

We would like to inform you that the content of this Notice may be amended or supplemented in view of changes in the epidemiological situation.

The version of this Notice may change from time to time, you can request the prior versions at gdpr@egis.hu.

For further information on your data protection rights, please visit <https://hu.egis.health/gdpr>. Egis expressly draws your attention to your right to object to data processing specified in this Notice at any time. If you object to the processing of your personal data, Egis will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. If you exercise your right to object to the data processing, Egis will examine whether the objection is well-founded. If it is not substantiated, Egis will not be able to grant you entry until you make the required statement and your body temperature does not exceed the limit.

If you have any questions related to data processing, please feel free to contact us at gdpr@egis.hu.