



dentsu

EMPLOYEE, JOB CANDIDATES AND JOB LEAVERS PRIVACY NOTICE

Last updated: May 2024

Innovating the ways brands are built

WELCOME

This Privacy Notice ('**Notice**') applies to the personal information we collect about Our People worldwide in recruitment, during employment and after they leave us. It explains how dentsu International ('**dentsu**', '**we**') uses your personal information - what information we collect about you (including from third parties), why we collect it, what we do with it and on what basis and how we protect it.

Where we refer to certain legal words or phrases, they're displayed in a **different colour**. You can find further detail of what these mean at the end of this Notice.

We regularly review this Notice and will take reasonable steps to inform you of any changes that we may make. Please read it carefully.

Please note, there may be additional guidance issued in your country of employment. That guidance will take precedence over this Notice.

1 WHO DOES THIS NOTICE AFFECT?

The Notice covers Our People and includes 'you', prospective, present and past employees, contractors, agency staff and people connected to you (such as the person you nominate to contact in an emergency).

Dentsu and its group of organisations use global HR information systems ('**HRIS**') for employment management and recruitment purposes to capture and store personal data of Our People.

2 WHO COLLECTS YOUR DATA?

Your **personal data** is collected by the **dentsu organisation** that you entered into an employment contract or relationship or a contract for services with, have applied for a role with, or used to work for. This dentsu organisation is a **data controller** in relation to the personal data that is collected about you. Your personal data may need to be **processed** by **other dentsu organisations** for their own independent purposes. In which case, these organisations are also data controllers of your personal data.

If you have questions about which dentsu organisation is a data controller in respect of your personal data, please contact your local HR team (job.hungary@dentsu.com) or your data protection officer (privacy.hungary@dentsu.com).

3 WHAT IS NOT INCLUDED?

The Notice is intended to tell you how we use personal information but is not intended to create a contract with you.

This Notice does not apply to the information we hold about companies or other organisations, or to other companies or organisations collecting and using your personal information. You should review their privacy policies before giving them your personal information.

4

HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect the majority of your personal information directly from you, but in some cases we will collect it from third parties.

When you provide personal data about yourself and others

This is personal data that you provide to the local HR Recruitment team or enter directly into our HRIS. You may also provide us with personal data about others e.g. your dependents. We use this information for HR administration and management reasons. Examples include the administration of employment benefits or contacting your next-of-kin in the event of emergency.

To comply with our legal obligations, or where we need this information to fulfil our obligations to you under an employment contract or contract for services, certain data fields in our HRIS are mandatory. Where HRIS fields are voluntary it is your choice if you wish to provide the information requested.

We may collect personal data from other organisations

We may obtain information about you from other organisations. For example, references from your previous employer(s) and background checks where permitted by applicable law.

We sometimes advertise through recruitment agencies or use the services of specialist search organisations. These companies will collect your application information. You may also be asked to complete a work preference questionnaire which is used to assess your suitability for the role you have applied for, the results of which are assessed by our recruiters.

If you are applying to work with us through an agency, please review their privacy notice for details of how they will handle your information.



WHAT KINDS OF PERSONAL DATA DO WE COLLECT AND HOW DO WE USE IT?

The personal data we collect about you depends on your circumstances, your role, the law and whether you are a prospective, current or past employee. Below you can find information about the purposes and types of personal information we process for job candidates, employees and job leavers.

JOB CANDIDATES: APPLYING TO JOIN DENTSU

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUND'S FOR PROCESSING
RECRUITMENT – APPLICATION STAGE	<p>We will use your personal information to assess whether you are suitable for a role with us and put in place arrangements for any interviews and assessments. This applies whether you have made an application directly to us, through an agency or a third party.</p> <p>This will also include contacting you to arrange, conduct, evaluate and feedback on assessments and interviews, and where successful to make you an offer/provide you with a contract of employment.</p> <p>For this purpose, we will collect your contact details and other information to confirm your identity. This includes your name, gender, address, phone number, date of birth, and email address, national insurance number. We will also collect information about your employment history and skills. This includes your CV, resumes, application forms, references, records of qualifications, skills, training and other compliance requirements. This may also include records of when you contact us, emails, webchats and phone conversations.</p>	Legitimate Interest
RECRUITMENT – SHORT LISTING	<p>Our hiring managers will shortlist applications for interview based upon the details uploaded by you to our online application system.</p>	Legitimate Interest
RECRUITMENT - ASSESSMENTS	<p>This involves the assessment of your suitability to do the job you have applied for.</p> <p>We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend a series of interview's – or a combination of these. Information will be generated by you and by us. For example, you may complete a written test or we may take interview notes.</p>	Legitimate Interest

JOB CANDIDATES: APPLYING TO JOIN DENTSU

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
PRE-EMPLOYMENT CHECKS	Carry out pre-employment checks (where permitted by law), including your legal right to work, professional qualifications, criminal record and follow up references provided to us.	Legal Obligation/ Legitimate interest
PRECISION JOB MATCHING	Understand if you have any prior employment history with us and the reasons why you left, check whether you have applied to us before, understand why you have declined a job offer from us if you did so, and see if you would be interested in other roles with us (you can always ask us not to contact you and we will respect your decision).	Legitimate interest
REASONABLE ADJUSTMENTS	<p>Make reasonable adjustments to the recruitment process based on the accessibility requirements you make us aware of or we become aware of.</p> <p>For this purpose we may, subject to the circumstances, collect information about you to help us assess adjustments which need to be made or work restrictions which may apply. This may include your nationality, preferred language, and details of any accessibility requirements.</p>	Legal Obligation/ Legitimate interest
EQUAL OPPORTUNITIES MONITORING	In some countries we may, subject to local laws, ask you to register with us your personal profile. This could include declaring information about your ethnicity, disability, age, religion/belief, gender and sexual orientation. This information is used to comply with equality and diversity requirements and to help us improve our employment practices. Access to this information is strictly limited.	Legal Obligations/ Legitimate Interest in countries where not legally required
TALENT POOL	If you are unsuccessful following assessment for the position you have applied for, we will retain your details in our talent pool for a period of 6 months so that we can contact you should any further suitable vacancies arise. If you would like us to delete this data, please contact us at job.hungary@dentsu.com	Legitimate Interest

Additional information about the ways in which dentsu processes your personal data may be notified to you locally. Unless otherwise stated above we use this information as it is in our legitimate interests as a recruiter to fully understand and assess an applicant's suitability for a role and verify the information provided to us.

EMPLOYEES: WORKING FOR DENTSU

We will use your personal information for the purposes of your **employment contract** with us, to **comply with legal obligations**, or where **we have a legitimate interest** in doing so to manage and protect our business. We will rely on legitimate interest pursued by dentsu where it is not overridden by the interests or fundamental rights and freedoms of Our People. This means we will:

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
CARRY OUT OUR ROLE AS YOUR EMPLOYER	<p>This involves allocating and managing your duties and responsibilities and the business activities to which they relate, enabling communication between staff, assessing your performance, helping change your work pattern when appropriate, arranging business travel, providing you with HR support and case management, and developing your skills (such as training and certifications), as well as assisting you in your career and succession planning.</p> <p>For this purpose, we would process information about your work contract, attendance and performance such as your start date, place(s) of work, performance reviews, development notes and plans, records of your training, HR records such as leave, sickness, grievances and other compliance requirements.</p>	Contract
REMUNERATION & BENEFITS ADMINISTRATION	<p>This involves providing and administering remuneration, pension and life cover benefits, and incentive schemes as well as making appropriate tax and social security deductions and contributions, as well as managing expenses.</p> <p>We will offer you the chance to choose benefits, where you are eligible. This may involve us passing appropriate personal information on to the relevant third party benefit provider so they can contact you, or you may register with them direct. We will also provide the details of any beneficiaries you nominate in case of death or other benefits to the relevant third party.</p>	Contract/ Legal Obligation
REVIEWS & COMPLAINTS HANDLING	<p>This involves managing and operating conduct, performance, capability, absence and grievance related reviews, allegations, complaints, investigations and processes and other informal and formal HR processes e.g. internal job applications, making related management decisions and anything else required under our contract with you.</p>	Contract
HR ADMINISTRATION & MANAGEMENT	<p>This includes maintaining and processing general records necessary for the management of staff and to operate the contract of employment or contract for services between you and the dentsu organisation.</p>	Contract

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	FOUNDATIONS FOR PROCESSING
CONSULTATION WITH WORKFORCE REPRESENTATIVES	This involves consultations or negotiations with representatives of the workforce, for example the relevant works council in your country location.	Legal Obligation
HEALTH & SAFETY SUPPORT AT WORK	<p>Processing information about absence or (where required or permitted by applicable law) medical information regarding physical or mental health or condition in order to: assess eligibility for incapacity or permanent disability related remuneration or benefits; determine fitness for work; facilitate a return to work; make adjustments or accommodations to duties or the workplace; and make management decisions regarding employment or engagement, or continued employment or engagement, or redeployment, and conduct-related processes.</p> <p>This includes providing support in work related injuries, illness, management of your health and safety, providing any accessibility support you may need (including where you make us aware in your health declaration upon joining us and as updated by you when appropriate) and contacting your emergency contact if ever needed. This may include us making a referral to the occupational health service and assisting you with ill health retirement applications.</p>	Legal Obligation
REFERENCE REQUESTS	Responding to reference requests from potential employers where dentsu is named as a referee	Legitimate Interest
EQUAL OPPORTUNITIES MONITORING	In some countries we may, subject to local laws, process information about your ethnicity, disability, age, religion/belief, gender and sexual orientation. This information is used to comply with equality and diversity requirements as an employer and to help us improve our employment practices. Access to this information is strictly limited.	Legal Obligations/ Legitimate Interest in countries where not legally required
COMPLIANCE MONITORING	<p>Monitor and document activity as required to demonstrate legal compliance. This includes conflict of interest records, gifts and hospitality and anti-bribery and corruption reporting and mandatory compliance training.</p> <p>Complying with applicable laws and regulation for example maternity or parental leave legislation, working time and health and safety legislation, taxation rules, worker consultation requirements, other employment laws and regulations to which dentsu is subject.</p>	Legal Obligation/ Legitimate Interest
LAWFUL REQUESTS BY PUBLIC AUTHORITIES	To comply with lawful requests by public authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities (including without limitation data protection, tax and employment), whether within or outside your country.	Legal Obligation

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	GROUNDS FOR PROCESSING
EMPLOYMENT MANAGEMENT IN CASE OF MERGERS OR ACQUISITIONS	Planning, due diligence and implementation in relation to a commercial transaction or service transfer that impacts your relationship with dentsu. For example, mergers and acquisitions or a transfer of your employment under automatic transfer rules.	Legitimate interest
MANAGING RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS	Disclosure of personal data to suppliers may be necessary to enable fulfilment of goods and services to dentsu and/or our clients.	Legitimate interest
CASE MANAGEMENT	Handle requests that you may make to us. It could be to help you participate in activities and programmes as an eligible employee.	Legitimate interest
CELEBRATION OF SPECIAL OCCASIONS	Contact you on special occasions such as your birthday and to recognise 'length of service' milestones working for us (but you can always ask us not to).	Legitimate interest
MANAGE OUR FINANCES	This includes managing forecasting, budget and account management and planning for the future.	Legitimate Interest
PREVENTING & DETECTING CRIME	Information required to prevent and detect unlawful activity including IT and building access rights and security monitoring, use of CCTV, fraud detection and prevention measures.	Legal obligation/ Legitimate Interest
BUSINESS REPORTING & ANALYTICS	Gathering information for business operational and reporting documentation, such as the preparation of annual reports including the use of photographic images, and staff engagement or benchmark questionnaires. Your data, if used, will normally be anonymised so that you would not be personally identified.	Legitimate interest
LEGAL CLAIM MANAGEMENT	Respond to and manage our case in a legal claim made by or against us. Such processing is subject to strict confidentiality provisions. This could include an accident at work.	Legitimate Interest

Please note, however, that this is not an exhaustive list of the purposes for which we process personal data.

LEAVERS: AFTER YOU LEAVE DENTSU

After you end your employment with us we may need to retain your personal information to fulfil certain business obligations for the following purposes:

PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION	PURPOSE IN DETAIL	FOUNDATIONS FOR PROCESSING
CLAIMS & DISPUTES	To deal with claims or disputes involving you or others. This could include an accident at work. We do this because we have a legal obligation to provide the information, or it is in our interests to bring or defend a claim.	Legal Obligation/ Legitimate interest
BUSINESS CONTINUITY	To understand and evidence decision making in your role and maintain knowledge within the business after you leave. We do this because it is in our interests to use this information to help run our business, or it may be to support a legal obligation we have.	Legal Obligation/ Legitimate Interest
EMPLOYEE RETENTION	To understand why you left us. We do this because it is in our interests to use this information to help run our business, or it may be to support a legal obligation we have.	Legal Obligation/ Legitimate Interest
PENSION ADMINISTRATION	To manage and administer your pension and related legal obligations.	Legal Obligation
OBLIGATIONS TO THIRD PARTIES	To comply with our obligations to third parties in connection with your employment, such as tax authorities and professional bodies.	Legal Obligation/ Contract
EQUAL OPPORTUNITIES MONITORING	Where required or permitted by applicable law, running monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under local anti-discrimination laws.	Legal Obligations/ Legitimate Interest in countries where not legally required

6

MONITORING OF WORK COMMUNICATIONS

In accordance with relevant laws, we reserve the right to monitor and scan electronic communications sent using the accounts, network and equipment we provide to you for work purposes. This is to ensure that dentsu IT resources are being used in compliance with the law and in accordance with dentsu policies. You can find more information about using dentsu IT resources in our Acceptable Use Policy on Neon.

We may need to access these communications for a range of reasons. These include complying with legal obligations placed on us to disclose information, to prevent or detect crime, or where we have a legitimate interest in doing so to promote and protect our business.



SHARING YOUR INFORMATION

ACROSS DENTSU

Dentsu is a global organisation. To ensure effective and efficient services and communication throughout the group, your personal data may be shared with other dentsu organisations, for example with our group companies in Japan and the USA.

The following people and teams within dentsu may be granted on a need-to-know basis access to your personal data:

- local, regional and global HR managers and HR team members;
- local, regional and executive management responsible for managing or making decisions in connection with your relationship with dentsu, or when involved in an HR process concerning your relationship with dentsu; system administrators; and
- where necessary for the performance of specific tasks or system maintenance, teams such as the Finance and IT Department and the Global HRIS support team.

Basic personal data, such as your name, location, job title, contact information, any published skills and experience profile, as well as any photo that you upload to the HRIS, may be accessible to other employees to facilitate standard business operations.

OUTSIDE DENTSU

Your personal data may be also shared with organisations outside of dentsu. To help you understand who these organisations are, here is a non-exhaustive list:

- **Third-party suppliers:** Organisations (and their sub-contractors) that provide us with technology solutions and/or support such as the organisations that have been engaged to host, support and otherwise maintain the HRIS. This could also include organisations that provide systems which interconnect with the HRIS. Examples include expenses management software, local payroll and benefits systems. Where we use a third-party service provider we'll make sure we follow the requirements of the law and that your personal information is protected by the appropriate technical and organisational measures.
- **Dentsu's professional advisers:** IT administrators, auditors, consultants, payroll providers, administrators of dentsu's benefits programmes.
- **Insurance providers:** We may also need to share your information with insurance providers in relation to our insurance policies.
- **Clients:** We share your information with our clients where necessary to manage and deliver services to them.
- **Public authorities:** We may will share your information with public authorities to comply with lawful requests (including without limitation to meet national security or law enforcement requirements) or where otherwise required, whether within or outside your country. We only share your personal information in accordance with applicable laws and have strong internal oversight of what we do and take expert advice to inform our approach.



PROTECTING YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have implemented appropriate technical and organisational measures to protect your personal information. These include but are not limited to, physical building controls, device and file encryption and ID verification. Where we transfer your personal information to third-party provider we only do so where we have the appropriate safeguards in place to protect your personal data.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We keep your personal data for as long as it is required in accordance with the purpose(s) for which it was collected. This will usually be the period of your employment or contract with the dentsu organisation plus the length of any applicable statutory limitation period once that employment or contract period has ended. For example, data such as tax and pensions information, may need to be kept for longer. Otherwise we will delete or anonymise it so that you cannot be identified and it can no longer be associated with you.



YOUR RIGHTS

Depending on your country of residence you may have a number of rights in respect of your personal data. Please consult your local data protection authority to find out what rights apply to you. We've detailed some examples below.

ACCESSING YOUR PERSONAL DATA

You may have the right to request a copy of the personal data that dentsu holds about you. If you are a current employee, you can access a copy of your personal data via our HRIS and other intranet-based tools.

KEEPING YOUR PERSONAL DATA CORRECT AND UP-TO-DATE

You have a right to request that any inaccuracies in your personal data are corrected. It is important that the personal information we hold about you is kept accurate and up to date. If you are a current employee, you can update your HR records directly via our HRIS and other intranet-based tools.

ERASURE AND RESTRICTING USE OF PERSONAL DATA

You have the right to request that we erase your personal data where:

- you believe the personal data is no longer necessary for the purposes it was originally collected;
- where you have been asked to provide consent to our processing of your personal data, you may withdraw your consent at any time by contacting your local HR Team. You should note that the withdrawal of consent may prevent us from carrying out certain tasks within the recruitment process.
- we are relying on the legal basis of legitimate interests to process your personal data (unless we can demonstrate compelling legitimate grounds for our processing of your personal data and those grounds override your interests); or
- your personal data has been unlawfully processed, or must be erased for compliance with an applicable legal obligation.

In addition, you may request in certain situations that we restrict our processing of your personal data. This means you can limit the way we use your data. We will still store your restricted personal data, but we will not use it.

DATA PORTABILITY

If you reside at the territory of the European Economic Area, you may request that we provide you with the personal data that we hold on file about you and, where technically feasible, to transmit that data to another organisation. Please note that there are limitations to this under relevant laws.

RIGHT TO OBJECT TO PROCESSING JUSTIFIED ON LEGITIMATE INTEREST GROUNDS

You may object to the way we process your personal data where we process it based on legitimate interest. In which case, we shall no longer process this personal data unless we can demonstrate compelling legitimate grounds to resume, or we need to process the data for the establishment, exercise or defence of legal claims. To find out when we process your personal data based on legitimate interest please refer to section 5 of this Notice.

10

HOW TO CONTACT US AND FURTHER DETAILS

If you'd like any more details, or you have comments or questions about our Notice, write to us at:

Dentsu's Data Protection Officer

- Email: dpo@dentsu.com
- Address: Data Protection Officer, dentsu International, registered office: Regent's Place, 10 Triton Street, London, NW1 3BF.
- Telephone: (+44) (0) 207 070 7700

Data Protection Manager who assists the activities of the Data Protection Officer in Hungary:

- E-mail: privacy.hungary@dentsu.com
- Address: dentsu Hungary Kft. registered office: 1027 Budapest, Kacsá utca 15-23., (corp. reg. no.: 01-09-168441)
- Telephone: (+36 1) 411 22 00

If you want to make a complaint on how we handle your personal information, please contact the Global Data Protection Officer who will investigate the matter and report back to you. If you are not satisfied with our response or believe that we are not using your personal information in line with the law, you also have the right to complain to the data protection authority in the country where you live or work. For Hungary, that's the National Data Protection and Information Security Agency - <https://naih.hu/>.

HOW WILL WE NOTIFY YOU OF CHANGES TO THE NOTICE?

Our Notice might change from time to time. We'll notify you about any changes to the Notice by posting on our website or Neon.

GLOSSARY

WORD OR PHRASE	WHAT DOES IT MEAN?
Dentsu organisation	The specific dentsu entity that entered into an employment contract or relationship or a contract for services with you.
Data Controller	<p>The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.</p> <p>This will be the dentsu organisation that entered into an employment agreement or contract for services with you. It may also include other dentsu organisations that need to process your personal data for their own purposes.</p>
Other dentsu organisations	The parents, affiliates, and/or subsidiaries of the dentsu organisation described above.
Processing (or Processed)	Any operation which is performed on personal data - such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Personal Data	Personal information means information that identifies you as an individual, or is capable of doing so. Any information relating to an identified or identifiable person. An identifiable person is someone who can be identified, directly or indirectly, by reference to details such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

ANNEX TO THE EMPLOYEE, JOB CANDIDATES AND JOB LEAVERS PRIVACY NOTICE

Last Updated 4th July, 2022

Preamble

The present Annex To The Employee, Job Candidates And Job Leavers Privacy Notice (hereinafter: **Annex**) serves as an inseparable attachment to Employee, Job Candidates And Job Leavers Privacy Notice (hereinafter: **Notice**).

The terms used in the present Annex are the same as those used in the Notice.

Dentsu organisations operating in Hungary

Data processing activities that are under the scope of the Notice are handled by the members of the dentsu Hungary as data controllers and as members of the dentsu International in Hungary.

Members of dentsu Hungary are:

Dentsu Hungary Kft.
CARAT Hungary 21. Média Kft.
Dentsu Creative Hungary Zrt.

The seat of the dentsu Hungary members is at 1027 Budapest, Kacsá utca 15-23.

Where reference is made to the HR team in the Notice, in Hungary this means the Hungarian HR team operated within the organisation of Dentsu Hungary Kft. (tel.: +36 (1) 411 2205).

Third person personal data collection

According to point 4 of the Notice, if you provide us personal data of third parties (eg. your relative or employee), before submitting these personal data to Us, we kindly ask you to

1. Inform the data subject whose personal data you intend to hand over to the dentsu organization and tell them for what purpose you need to hand over the personal data and how we process personal data;
2. Make sure that the data subject agrees to share personal data with us or whether the transfer of the personal data has a valid legal basis other than the consent of the data subject.

You do not need third parties' consent described in point 2 to hand over their personal data in case if the personal data you provide of third parties is processed for the purpose of compliance with legal obligation (such as to provide a benefit or allowance).

In case of data processing for certain legal obligations, if you do not provide us with personal data about third parties (primarily in reference to our employees' relatives) or these personal data you have provided was not accurate, you may not be eligible for certain benefits or allowances.

The dentsu organization assumes no responsibility for the appropriate legal basis for obtaining personal data from our employee or contractor relating to third parties. You must warrant that the personal data of the third party will be transferred to the dentsu organization with an appropriate legal basis and appropriate information provided to them on our data processing according to the Notice and this Annex.

Notification before processing personal data

Please note that before we use your personal data for purposes other than those specified in the Notice, we will inform you about this before we begin to process your personal data, if necessary, request your consent for the data processing.

Data Processing for purposes not contained in the Notice

We may also process your personal data based on your prior consent. If you submit your application and referrals as described in the first row of point 5 of the Notice during the recruitment – application stage, this will also imply that you consent to the processing of your personal data as described in the part of the Notice concerning the job seekers.

We may process your personal data based on your prior consent in case of various events, workshops, parties and team building occasions organized by the dentsu organization.

Please note that if your personal data is processed based on your prior consent, you may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of data processing until the point your consent has been withdrawn.

Monitoring of employee communication

Please note that the provisions of dentsu Hungary Group concerning the communication of employees and their monitoring are contained in the dentsu Hungary IT Policy available in the local Intranet site.

Operation of camera system

The dentsu Hungary Group records the entering and the exiting from its office with its camera system operated by the Group itself. Data subjects can find the detailed privacy notice at the reception of the dentsu Hungary Group common head office (1027 Budapest, Kacska u. 15-23.). Prior to entry, information boards will also notify the data subjects to the operation of the camera system in the office.

Employee access card

The dentsu Hungary Group provides access cards to its employees for the entry to and the exit from the office. By the use of these access cards, the dentsu Hungary Group processes the following data for the following purpose and upon the following legal basis and until the below stated period.

Personal data categories	Purpose of data processing	Legal basis of data processing	Period of data processing
Employee name, employee access card's number	Ensuring the entry to and the exit from the office	Processing is necessary for the purposes of the legitimate interests pursued by dentsu Hungary Group (article 6 (1) f) of the GDPR)	30 days after recording the personal data

Sharing your personal data in dentsu international company group

Please note that the dentsu Hungary Group is a member of the international dentsu group. We use a number of software provided by the international company group, so it is conceivable that the members of the international company group can also request data from these systems for statistical, reporting or auditing purposes based on the legitimate interest of the company group. In all cases, these data requests are carried out for the purposes defined by the member of the international company group, communicated to the dentsu Hungary Group in advance and necessary for the proper functioning and development of the organization (on the basis of legitimate interest).

An example of the above data request, as well as the transfer of data to a member of an international group of companies, is the request of salary data from the dentsu Hungary Group for reports related to the salary data of employees.

Data from the Workday system can also be reported for statistical purposes to the international company group for the purpose of organizational development. Such data can be data related to workplace health protection belonging to the special category of personal data. In all cases, the legal basis for handling this data is the requirement of legislation (primarily the Occupational Safety and Health Act).

Sharing your personal data outside of dentsu organisations

Please note that the list of data processors with whom we may share your personal data outside of dentsu can be found in Appendix 1 of this Annex, which contains the names, contact details and the short description of the task they perform. The dentsu Hungary Group keeps Appendix 1 up-to-date, and the modification of Appendix 1 does not require the modification of the Notice or this Annex at the same time.

Sharing your personal data outside of EEA member states

Please note that we will only forward your personal data to non-EEA countries after we have verified that a third-country data controller or data processor meets the requirements of Chapter V of the GDPR. If this can not be established or there is doubt as to the security of the data transfer, we only share your personal data with your expressed consent.

How to exercise your rights in Hungary

You can exercise your rights set in point 9 of the Notice by sending an e-mail or a mail to the dentsu Hungary Group.

Dentsu Hungary Kft. represents the Group, which has the following contact details:

Seat: 1027 Budapest, Kacsá u. 15-23.

Contact person for data protection related issues: Éva Pőcze

Telephone: +36 1 411 2200

E-mail: privacy.hungary@dentsu.com

Data Protection Officer of the dentsu Hungary Group:

Garreth Cameron

E-mail: dpo@dentsu.com

Address: Data Protection Officer, dentsu International, Regent's Place, 10 Triton Street, London, NW1 3BF

Telephone: +44 0 207 070 7700

dentsu organisation shall notify you within one month of receiving your request. In case your request is complex or time consuming to address we may extend the deadline with two additional months. In case of an extension to the deadline we shall notify you - stating the reasons of the extension as well - within one month of the reception of your request. In general the fulfilment of your request is free of charge. If the fulfilment of your request is - considering the repetitiveness of the request - excessive or it is unfounded the dentsu organisation may charge a reasonable fee taking into account the administrative costs of providing the information or communication or the dentsu organisation may refuse to act on your request.

The dentsu organisation shall inform you without delay but not later than within a month if it refuses to act on your request and the reasons of it and also that you can turn with your complaint to the local data protection authority or appeal the decision at court.

In case of your unexpected death your rights may be exercised within five years following your death by a person designated by you by means of an administrative disposition, or by a statement executed before the dentsu organisation in an authentic instrument or private document representing conclusive evidence.

If you did not make a legal statement provided for in the previous paragraph hereof, your close relative provided for in the Civil Code shall be entitled to exercise the rights of rectification or the right of objection and - if data processing had already been found unlawful in your lifetime or if the purpose of data processing ceased upon your death - to exercise the right to erasure or restriction, accrued to you in your lifetime within 5 years after your death. Your rights may be enforced in accordance with this paragraph by the close relative who first exercises such entitlement.

The person exercising your rights according to the above shall evidence your death and the time of death with a death certificate or court ruling, and shall verify his or her identity - and his or her relation in the case provided for in the previous paragraph - by means of an authentic instrument.

Remedy of data processing

You may initiate the official examination of the lawfulness of the dentsu organisation at the National Data Protection and Information Authority (1055 Budapest, Falk Miksa u. 9-11., www.naih.hu, hereinafter: NAIH) if the dentsu organisation prior to the commencement of the data processing did not or not according to the regulations of the GDPR or to the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information informed you on the data processing, or if the dentsu organisation restricted you from exercising your rights or refuse to act on your request. The official examination may also be initiated if – in your opinion – dentsu organistaion or data processor of the dentsu organisation is in violation of data protection regulations.

You may initiate a procedure in front of a court of your residence against the dentsu organisation or its data processor if in your opinion they are processing your personal data in violation of data protection regulations.

Final provisions

The dentsu Hungary Group reserves the right to modify this Annex at any time without the parallel modification of the Notice. We will inform You about any modification of this Annex or the Notice with the publication of the amended Annex or Notice on the Intranet.

Appendix:

No. 1. – List of Data Processors:

https://globalappsportal.sharepoint.com/teams/danhungaryhr/Shared%20Documents/HR/Polices/Munkavallaloi_adattovabbitas.pdf