



INFORMATION NOTICE

- **ON ENTRY AND EXIT PROCEDURES**
- **ON THE USE OF CAMERAS**
- **ON PACKAGE INSPECTIONS**
- **ON DATA PROCESSING RELATED TO THE WEBSITE AND CONTRACTS**

Effective: from 30.08.2024

RESPECTED AREA CONCERNED!

EWG Group is a full-service logistics company and a leading player in the domestic market. In Hungary, three related companies (East-West Intermodal Logistics Zrt. as the parent company and its two subsidiaries EWG Rail Zrt. and EWG Customs Agency Zrt.) operate under the EWG brand, are affiliated companies and act in close cooperation with each other.

The members of the EWG Group (Data Controllers) are committed to protecting the personal data of persons (collectively: data subjects) who wish to visit the EWG Group or enter into a legal relationship with the EWG Group, and attach great importance to respecting the right of self-determination of data subjects.

The branch office at 1, Terminal Road 4621 Fényeslitke is wholly owned by the parent company East-West Intermodal Logistics Service Provider Limited Liability Company, and therefore it is the data controller for the camera system and the entry and exit. Companies and tenants operating on the premises are considered as data processors. In other cases, our specific contracting Company or, in the case of an e-mail sent to our specific Company, the specific /addressed Company shall be considered the data controller.

Data Controller(s) and contact details

East-West Intermodális Logisztikai Szolgáltató Zártkörűen Működő Részvénytársaság

company abbreviated as East-West Intermodal Logistics Zrt.

head office: 1134 Budapest, Róbert Károly körút 59.

branch office: 4621 Fényeslitke, Terminal road 1.

company registration number: 01-10-049830

Phone number: +36 1/866-3055 .

E-mail address: adatvedelem@eastwestil.com

EWG Rail Zártkörűen Működő Részvénytársaság

abbreviated name of the company: EWG Rail Zrt.

head office: 1134 Budapest, Róbert Károly körút 59.

branch office: 4621 Fényeslitke, Terminal road 1.

company registration number: 01-10-049688

Phone number: +36 1/866-3080

E-mail address: adatvedelem@ewgrail.com

EWG Customs Agency Szolgáltató Zártkörűen Működő Részvénytársaság

company abbreviated name: EWG Customs Agency Zrt.

head office: 1134 Budapest, Róbert Károly körút 59.

branch office: 4621 Fényeslitke, Terminal road 1.

company registration number: 01-10-141551

Phone number: +36 1/866-3070

E-mail address: adatvedelem@ewgcustoms.com

- hereinafter referred to as: the **Data Controller**

Purpose of data processing

1. Entry and exit:

The purpose of the operation of the electronic entry and exit system at the gates is to prevent unauthorised access to the areas, to verify and control the overtime accounts.

2. Scratchy observation:

2.1. Surveillance cameras:

The purpose of the operation of the camera surveillance system is to protect human life and limb and to protect property, in particular to prevent unauthorised access to the monitored areas, theft and other criminal offences.

2.2. Technological cameras:

The purpose of the operation of the technological cameras is to guarantee reliability, i.e. to continuously monitor the operation of the Data Controller in order to ensure the continuous, smooth and safe production of the Data Controller.

3. Package check:

Checking clothing, luggage and bags of persons entering and leaving the branch Personal and property security, crime prevention.

Environmental protection, nature conservation (Logistics activities carried out at a branch - including dangerous goods particularly in view of its wide-ranging nature)

4. Data processing concerning the Website and Contracts:

The former is intended to facilitate the establishment of a contractual relationship, the latter is necessary for the performance of the contract.

Legal basis for processing

The Data Controller processes the personal data you have provided to it in accordance with Article 6(1)(f) of Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC [General Data Protection Regulation] (hereinafter: GDPR), where processing is necessary for the purposes of the legitimate interests pursued by the Data Controller (legitimate interest).

Description of data processing

Description of data processing	Scope of data processed	Purpose of data processing	Legal basis for processing	Source of data	Recipients of data processing
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Camera surveillance	Stakeholders Picture of	Surveillance cameras: The camera the purpose of the operation of a surveillance system is to protect human life and limb, or protection of property, in particular against unauthorised entry into the monitored areas , theft and other prevention and deterrence of crime.	GDPR - Article 6 (1) paragraph point (f): legitimate interest	concerned	data processors using the area
		Technological cameras: The technology cameras the purpose of operating the to guarantee reliability, i.e. the continuous monitoring of the operation of the Data Controller accompanying the and For the continuous, smooth and secure production of the Data Controller.			

Contact requests related to camera recordings	- Name of the applicant concerned in the case of an applicant on the record Portrait and Identity document details - Postal address depending on how the copy of the record was received or e-mail address - A necessary to identify the recording any further, a information provided by the applicant	Handling of data subject requests related to camera footage	Compliance with legal obligation: GDPR Article 12	Contact	
Entry and exit	- name card number - position (if employee) - identity document number where applicable: registration number	The purpose of operating an electronic entry and exit system at the gates is to prevent unauthorised access to the sites preventing, verifying and controlling overtime accounting.	GDPR - Article 6 (1) paragraph point (f): legitimate interest	electronic access control system	data processors using the area

parcel check	- name card number - object to be confiscated - Name , description	Checking clothing, luggage and bags of persons entering and leaving the branch and Personal security, property crime prevention. Environmental protection, nature conservation (including the hazardous nature of the logistics activity at the branch)	GDPR - Article 6 (1) paragraph point (f): legitimate interest	concerned	data processors using the area
Data processing concerning the Website and Contracts	- Name - e-mail addresses, - phone number - the possible mailing address of those who are listed as professional contacts due to their job title	the preparation, conclusion and performance of contracts.	GDPR Article 6(1)(b): contractual obligation	concerned	

Duration of storage of personal data

The data controller stores the recordings from the cameras as follows:

- For Surveillance and Technology cameras, recordings for 5 days
- Footage from cameras installed on warehouse or gateway gates for 30 days, provided no offence is committed. In the event of an offence, the data controller will delete the data after the relevant labour, official or judicial investigation has been legally concluded.

The data controller stores the entry and exit data for 5 years from the date of entry and exit.

The written record of the package check is stored by the data controller until the final conclusion of the relevant labour, official or judicial investigation.

Contracts for 5 years after the contract has been performed.

Tomorrow's e-mails: for the time necessary to achieve the objective.

Recipients of the data processed

As mentioned above, our parent company uses data processors for some of the processing of data in relation to the camera system and entry and exit:

EWG Rail Zártkörűen Működő Részvénytársaság

is the abbreviated name of the company EWG Rail Zrt.

headquarters: 1134 Budapest, Róbert Károly körút 59.

branch: 4621 Fényeslitke, Terminal út 1.

company registration number: 01-10-049688

EWG Customs Agency Szolgáltató Zártkörűen Működő Részvénytársaság

abbreviated name: EWG Customs Agency Zrt. head office: 1134 Budapest,

Róbert Károly körút 59. branch office: 4621 Fényeslitke, Terminál út 1.

company registration number: 01-10-141551

The recipient of data processing is also:

In the case of a criminal offence, the investigating authority or court.

Processors shall act in accordance with the instructions of the Data Controller.

No data is transferred to third countries or international organisations.

In relation to this processing, you have the following rights

Please be informed that you, as the data subject, may request the Controller to access, rectify, erase or restrict the processing of personal data concerning you and object to the processing of such personal data. You may also exercise your right to data portability. Please note that you may request further information about the processing of your personal data by contacting the Data Controller processing your personal data at the contact details set out in the introductory part of this Privacy Notice.

A description of some of your rights:

Your right to information: you may request, through the contact details provided by the Data Controller, information in accordance with the law on which data are processed by the organisation, on what legal basis, for what purpose, from what source and for how long. Your request will be answered promptly, but within 30 days at the latest, by sending information to the contact details you have provided.

Right of access to your personal data: you have the right to receive feedback from the Data Controller as to whether your personal data are being processed and, if such processing is taking place, you have the right to access your personal data and the information required by law. Therefore, on this basis, you have the right to contact the Controller and request information about the processing of your data and access to your data. Upon your request, action shall be taken promptly and within 30 days at the latest and information shall be sent to the contact details you have provided.

Right to rectification of data: if your data changes, you can request the rectification of your data at any time by providing us with the correct data. If your personal data has been changed, we will promptly take action on your request, but within 30 days at the latest, and will send you information to the contact details you have provided.

Right to data erasure: You may request the erasure of your data through the contact details provided by the Data Controller, if a legal ground for erasure exists and is indicated in the request. Upon a lawful request, the Controller will promptly, but within 30 days at the latest, take action to delete the data requested and will send a notification to the contact details provided that the request has been complied with. If the ground for erasure stated in the request is not lawful, the controller shall consider whether it wishes to and will erase the data or continue to process the data during the lawful period of processing until its expiry. The controller shall also inform the data subject of this decision.

Right to restriction of processing: You may request restriction of processing if the processing is unlawful, if the controller no longer needs the data for the purpose of processing, but you wish to use them to pursue a legal claim. Restriction of processing means that the data may only be stored until the restriction is lifted and may only be used for the purpose of submitting a legal claim.

Right to object to processing: you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation. In such a case, the Data Controller will examine individually whether there are legitimate grounds for the processing. The objection shall be examined and a decision shall be taken on its merits within the shortest possible time from the date of the request, but not later than 45 days, and the decision shall be communicated to the contact details provided.

Right to data portability: you may request to receive or transfer your data through the contact details provided by the Data Controller, if a legal ground for the data portability exists and is indicated in the request. Where the right to data portability is mandatory under Article 20 GDPR, the data must be provided as soon as possible and at the latest within 30 days of receipt of the request, in the manner required by law, and the data subject must be informed in the event of a data transfer.

Right to lodge a complaint with a supervisory authority.

(Contact: 1055 Budapest, Falk Miksa utca 9-11., 1363 Budapest, Pf.: 9., +36-1-391-1400, ugyfelszolgalat@naih.hu).

Recourse to the courts: you have the right to take legal action if you consider that the controller or a processor acting on its behalf or under its instructions is processing your personal data in breach of the rules on the processing of personal data.

Data security

The Data Controller shall ensure the security of the data. To this end, it has taken the technical and organisational measures and established the procedural rules necessary to enforce the applicable laws, data protection and confidentiality rules. The Data Controller shall ensure that the data are

protect against unauthorised access, alteration, disclosure, transmission, publication, deletion or destruction, accidental destruction or damage, and inaccessibility due to changes in the technology used. The Data Controller shall (also) ensure the enforcement of data security rules by means of internal rules, instructions and procedures, which are separate in content and form from the Data Processing Rules and this Notice. When defining and applying measures for data security, the Controller shall take into account the state of the art and shall choose among several possible processing solutions the one which ensures a higher level of protection of personal data, unless this would imply a disproportionate level of difficulty.

If you have any questions about the processing of your personal data, please contact one of the email addresses of the Data Controllers.

e-mail address, this Privacy Notice is also available at the registered offices of the Data Controller companies and will be made available electronically upon request.

Remedies

If you believe that the Controller(s) havenot acted in accordance with the law in processing your data, you have the right to lodge a complaint with a supervisory authority or to take legal action in accordance with the applicable law. Please contact the Controller(s) using one of the contact details above before lodging a complaint with the supervisory authority or a court in order to discuss and resolve the problem as soon as possible.

Other provisions

The provisions of these rules should be reviewed annually and, in the event of changes to the law, the rules should be amended accordingly.

The date of entry into force of this Regulation is 30.08.2024.

Issuing a document

Prepared by Dr. Fridman Róbert Law Office



Approved by:

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