

Privacy Notice

for the business partners and suppliers of Ceva-Phylaxia Zrt.

<i>Need for information on data processing</i>	The purpose of this Privacy Notice is to provide you with an overview of the processing of your personal data by Ceva-Phylaxia Zrt. and to inform you of your rights in this regard.		
<i>The controller (joint controllers)</i>	The controller of your personal data is Ceva-Phylaxia Zrt. (1107 Budapest, Szállás Street 5.). In connection with the operation of the IT systems, the whistleblower alert system data is jointly processed between Ceva-Phylaxia Zrt. and CEVA Santé Animale SA (FR-33500 Libourne, de la Ballastiere avenue 10., France, hereinafter "CEVA SA").		
<i>Joint controller agreement</i>	Since Ceva-Phylaxia Zrt. and CEVA SA jointly determine the purposes and means of the processing of the personal data of the data subjects in relation to the above joint processing activities, exercise a significant influence on the determination of the means and means of processing and carry out (at least partially) the above processing operations jointly, they are in a joint controller position with regard to the processing of these personal data. To this end, Ceva-Phylaxia Zrt. and CEVA SA have concluded an agreement on joint processing activities. The purpose of the agreement is to regulate their joint data processing activities as joint controllers in a transparent manner, in particular to define - the data processing activities subject to joint processing, - their respective responsibilities for fulfilling their obligations in relation to the processing, in particular the exercise of data subjects' rights in relation to the processing and the provision of information on the processing, - the rules governing their liability for processing.		
<i>Purpose and legal basis for the processing of Data Subjects' data, duration</i>	The purposes for which your personal data are processed, the data processed, the legal basis for the processing and the duration of the processing are summarised in the table below:		
<i>Purpose of data processing</i>	<i>Data processed</i>	<i>Legal basis for processing</i>	<i>Duration of data processing</i>
meeting the legal requirements for documenting the transport of hazardous waste	the name, telephone number, signature of the data subject, the data recorded on the delivery note	to comply with a legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Art. 5. paragraph (1) and Art. 7. paragraph (7) of the Government Decree No. 225/2015 (VIII. 7.)]	10 years pursuant to Art. 7. paragraph (7) of the Government Decree No. 225/2015 (VIII. 7.)
Permit to Work system; registration of guests entering the site for construction/assembly work	name of person data subject, name of employer, details of work (place, time) access rights, registration number, entries, exits, details of movements on the premises	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	termination of employment + 5-year limitation period
processing of data regarding the documents certifying the qualifications required to carry out certain assembly/construction operations (e.g. welding, fire protection, crane operator's licence).	the name of the data subject and the serial number of the certificate for access to his/her official documents, fire safety certificate, crane operator's certificate	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	termination of the business relationship + 5-year limitation period

			The number of the fire permit of the persons working on the premises is recorded in the fire permit, which is kept for 5 years.
maintenance logs/work logs (e.g. FIREG) and mandatory periodic inspections for the maintenance of fire protection equipment and defibrillators	name of the data subject, identification, details of the intervention carried out, signature of the data subject	to comply with a legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; in connection with the maintenance of fire protection equipment: Art. 202 paragraph (4) point (d), Chapter XX, Annex 18 of the BM Decree No. 54/2014 (XII.5.) ("OTSZ"); in connection with the review of defibrillators and respirators: Art. 27. of the EüM Decree No. 4/2009 (III.17.)]	5 years for fire protection equipment according to Art. 254. of the OTSZ (FIREG system). Regarding defibrillators and respirators: for the lifetime of the product.
alcohol screening for persons carrying out construction/assembly work on site	name (examiner and person examined), date of examination, title, result of examination, examiner's signature	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	only the positive result is retained for the duration of the business relationship
Occupational safety and health training for persons who work on the company's premises but are not employed by the company	name, signature of the data subject	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	5 years after the work has been completed.
The obligation to keep on-site records of the waste disposed of; in the case of a shipment of waste, a receipt issued by the waste producer.	name, address, signature of the recipient, signature of the transferor, details of the delivery note	to comply with a legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Art. 3. paragraph (1) and Art. 4/A. paragraph (1) and Annex 1 of the Government Decree No. 309/2014 (XII. 11.)]	5 years, 10 years in case of hazardous waste, pursuant to Art. 65. paragraph (4) of the Act CLXXXV. of 2012 on Waste

Entrance control (for those with an entrance card) and guest registration (registration of guests entering Ceva premises)	name, employer, department visited, name of host, parking entitlement, card number issued, movement details	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	card data are kept for 3 months; user data are invalidated after the expiry of the authorisation
Guest registration (register of guests entering Ceva's sites), documentation of health and safety, fire protection and environmental information given to visitors to the site, protection of property	The name and telephone number of the data subject, the employer, the license plate number, the name and telephone number of the Ceva contact person, the purpose of the visit, the PTW number, the date of the visit, the time of entry and exit, the site visited, the signature of the data subject, the serial number of the access card made available to the data subject, the statement of the data subject on the acquaintance with the Safety Information and compliance with its contents, where applicable, the specific type of access (goods, hazardous waste), the name of the guard acting.	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	3 months, in case of an incident, the end of the procedure + limitation period
guard duty reports, duty logbook	name of data subject, content of report/event	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	30 days, if action is necessary, until the end of the action/proceedings + limitation period
package presentation, tool list	the parcel of the data subject, the identification of the object similar to the one found on the site, the name of the data subject, his/her employer	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	parcels are screened only, if further action is required, the data will be processed in accordance with the data processing for the guarding report
For the purpose of protecting the property of Ceva or the persons staying at the premises, and to ensure the safety of the premises and its occupants, the inspection of the package if there are reasonable grounds to believe that the data subject is in possession of property resulting from a criminal offence or a regulatory offence, the custody of which is a contractual obligation of the property guard, and the property is not handed over despite a request to do so, and the measure is necessary to prevent or interrupt the offence (Art. 26. paragraph (1) point c) of the Property Protection Act and Art. 28.	the contents of the data subject's package	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	Insight only, if further action is required, the data will be processed in accordance with the data processing for the guarding report.

paragraph (1) of the Act on the Rules of Personal and Property Protection and Private Investigation).			
registration of number plates	name, registration number	Consent pursuant to Art. 6. paragraph (1) point (a) of the GDPR	until the consent is withdrawn, but no later than the date of termination of the right to access
Ensuring regulatory control of compliance with obligations arising from legislation on the resilience of critical organisations.	the identification and contact details of critical natural person suppliers, contractors and their contact persons	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Government Decree No 474/2024 (XII.31.), Annex 2, point 1.18.10.]	Until the critical supplier / representative position is filled.
keeping records of customers/suppliers for accounting purposes and to manage customer and supplier invoices	name, registered office, tax number, bank account number, sole trader number	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Art. 169 of the Accounting Act]	existence of business relationship + 8 years (pursuant to Art. 169. paragraph (2)-(3) of the Act C. of 2000))
waybill/weight list (proof of conclusion of transport contract, proof of completion of transport)	name, signature, transport details	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Art. 15. paragraph (2) of the Act C. of 2000.; Art. 4-5 of the Geneva Convention on the Contract for the International Carriage of Goods by Road, promulgated by Decree-Law No. 3 of 1971.]	8 years (pursuant to Art. 169 paragraph (2)-(3) of the Act C. of 2000. and Art. 22. paragraph (6) of the Government Decree No. 261/2011 (XII.7.))
tracking of delivered products (wholesale distribution)	name of the data subject, details of the product/transaction delivered (date, name of the product, the quantity delivered, name and address of consignee, serial number, accompanying documents of the transaction)	To comply with a legal obligation under Art. 6. paragraph (1) point (c) of the GDPR (Art.50. paragraph (2) point g) and h) of the FVM (Ministry of Agriculture and Rural Development) Decree No.	5 years, but not later than 1 year after the expiry date of the veterinary medicinal product concerned (according to Art. 50. paragraph (2) point (h) of the FVM (Ministry of Agriculture and Rural Development))

		128/2009 (X.6.))	Decree No. 128/2009 (X.6.))
tracking of delivered products (retail distribution)	name of the data subject, details of the product/transaction delivered (date, name of the product, the quantity delivered, name and address of consignee, serial number, accompanying documents of the transaction)	To comply with a legal obligation under Art. 6. paragraph (1) point (c) of the GDPR (Art.69. paragraphs (5). (6) and (8) of the FVM (Ministry of Agriculture and Rural Development) Decree No. 128/2009 (X.6.))	8 years (pursuant to Art. 169 paragraph (2)-(3) of the Act C. of 2000. and Art. 22. paragraph (6) of the Government Decree No. 261/2011 (XII.7.) and considering that Ceva relies on invoices for the purpose of compliance with the obligation)
Tech DB - Worksheet system (WO) Identification of the work performed on the site, the operations carried out, the date of the operation and the person who carried it out.	the name/identifier of the data subject, the operation carried out and its date	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; According to Annex 7. point 10. of the FVM (Ministry of Agriculture and Rural Development) Decree No. 128/2009 GMP Volume 4. point 4.31.]	5 years (according to point 4.11 of the GMP)
making image films/recordings/interviews	A fixed or moving image of the data subject (with or without sound), an audio recording of the data subject, a statement by the data subject.	Consent [Art. 6 paragraph (1) point (a) of the GDPR]	Withdrawal of consent, in case of enforcement, the duration of the procedure
keeping machine logs, maintenance and cleaning logs (Logbooks)	the name/identifier of the data subject, the operation carried out and its date	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; in case of GLP, according to Annex 1, point 10.1. d) of the EMMI (Ministry of Human Resources) Decree No. 42/2014, (point 10.1 of the GLP), in case of GMP, according to point 10. of	For GLP logs: 15 years after the annual archiving (according to Annex 1. point 10.1 of the EMMI (Ministry of Human Resources) Decree No. 42/2014) In case of GMP logbooks: expiry date of the batch concerned + 1 year, but at

		Annex 7. of FVM (Ministry of Agriculture and Rural Development) Decree No. 128/2009, point 4.31 of Chapter 4. of Part 1. of Volume 4. and point 12.4 of Annex 11 of Volume 4 of the GMP]	least 5 years after the issue of the control report (according to Annex 7. point 10. of the FVM (Ministry of Agriculture and Rural Development) Decree No. 128/2009)
Ensuring compliance with the pharmacovigilance system: collection, investigation, evaluation, regulatory reporting and archiving of suspected adverse events and/or reactions to authorised veterinary medicinal products/products.	the name of the data subject(s), contact details (telephone, e-mail or address), details of the adverse event reported, details of the adverse reaction	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Art. 80. paragraph (2) of the FVM (Ministry of Agriculture and Rural Development) Decree No. 128/2009, in the case of any special categories of personal data Art. 9. paragraph (2) point (g) of the GDPR]	The data will be kept for 10 years after the expiry of all marketing authorisations of the product concerned (pursuant to Art. 80. paragraph (2) point e) of the FVM (Ministry of Agriculture and Rural Development) Decree No. 128/2009)
contact with Ceva-Phylaxia's commercial partners, potential partners or persons acting on their behalf	name, contact details (e-mail address, telephone number), title, company represented	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR]	We keep the data recorded in the contract for as long as we keep the contract (statute of limitations or accounting retention period). We keep potential partners for a maximum of 1 year.
I&D project database (submission of individual orders covered by framework agreements between Ceva-Phylaxia and some of its partners, and tracking of the soldering work covered by the order, proof of completion).	name, title, signature	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Art. 15. paragraph (2) of the Act C. of 2000., Part 5. point 5.1 of the GMP]	We keep the recorded data for as long as we keep the framework contract (limitation period or accounting retention period).
Fulfilling customer due diligence obligations pursuant to Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (Pmt.)	name and surname, name and surname at birth, nationality, place and date of birth, mother's name at birth, address or, in the absence of address, place of	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Art 7.	eight years from the termination of the business relationship or

	residence, type and number of identity card, signature on declaration	paragraph (2) of the Pmt.]	the execution of the transaction (pursuant to Paragraph (2) of Art. 56. paragraph (2) of the Pmt.)
fulfilment of the client identification obligation pursuant to Act LXXVIII of 2017 on the Ütv. (Act on the Activities of Lawyers)	the number of the identity card, the number of the residence card, the personal identification number, the name, country and place of birth, nationality, place of residence, date of declaration of residence and place of residence, the portrait on the document, the signature on the document, the status (validity) of the documents. Personal data contained in the register of identified natural persons required by Art. 33 paragraph (1) of the Ütv: natural person identification data, address, nationality, statelessness, refugee, immigrant, settled or EEA national status, type and number of the identification document used for identification, the identifier of the response to the request for data as specified in Art. 32 paragraph (3) of the Ütv., the case identifier of the cases in which the identification of the natural person is mandatory, the data specified in the Act on the Prevention and Combating of Money Laundering and Terrorist Financing	legal obligation [Art. 6 paragraph (1) point (c) of the GDPR; Ütv. 32.§]	8 years after identification (pursuant to Art. 33. paragraph (7) of the Ütv. and Art. 56. paragraph (2) of the Pmt.)
To assert and defend legal claims brought by or against Ceva, to represent Ceva in legal proceedings	the data used to identify the data subject, and data relevant to the claim, procedural data	legitimate interest [Art. 6 paragraph (1) point (f) of the GDPR], in the case of any special categories of personal data, Art. 9 paragraph (2) point (f) of the GDPR]	5 years after the closure of the case (based on the MÜK Regulation No. 16/2018)
Operation of a whistleblower alert system	the personal data of the person making the report, the person whose act or omission gave rise to the report and the person who may have material information on the subject matter of the report which is essential for the investigation of the report.	Fulfilment of the legal obligation under Article 6(1)(c) GDPR (Article 26. § (1) of Act XXV of 2023)	Duration of the investigation, expiry of the limitation period in case of any action

<i>Rights of the Data Subject</i>	Under Regulation (EU) 2016/679 of the European Parliament and of the Council 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 ("GDPR"), You: i) may request access to personal data concerning you, requesting information about the data processed by the controller. The information or a copy of the data processed will be provided free of charge. Additional copies requested by you may be charged a reasonable fee based on the administrative cost, (ii) may request the rectification, erasure or restriction of the processing of personal data concerning you, (iii) may request that the controller informs you about the recipients whom it has informed about the rectification, erasure or restriction of processing, (iv) if the legal basis for processing is your consent, you can withdraw your consent at any time. The controller may also process personal data after the withdrawal of consent for the purposes of complying with legal obligations or pursuing legitimate interests, where such interests are proportionate to the restriction of the right to the protection of personal data, (v) if the legal basis for the processing is your consent, you may exercise your right to data portability: in relation to personal data relating to you which is provided by you to the controller and processed by automated means, you may request to receive such data in a structured, commonly used, machine-readable format or to transmit such data to another controller. You may also request that, where technically possible, your personal data be transmitted directly by the controller to another controller, (vi) where the legal basis for the processing is the legitimate interest of the controller [Art. 6 (1) (f) of the GDPR], exercise the right to object. If the legal basis for the processing is legitimate interest, you may object to the processing of your personal data at any time. You may object free of charge to the controller.
<i>Consequences of failure to provide data</i>	In the case of data processing based on a legal obligation, the consequence of not providing the data is that the Data Controller is unable to comply with the legal obligation. In the case of data processing based on legitimate interests, the consequence of not providing data is that the Data Controller is unable to perform its activities with sufficient efficiency. In the case of data processing based on consent, the provision of personal data is not mandatory, but in the absence of such data, parking on the premises of the controller or appearing in image films/recordings/interviews is not possible.
<i>Recipients of personal data, transfer of personal data</i>	The data controller Ceva-Phylaxia Zrt. transfers your personal data to agents and processors performing the following tasks: (i) Microsoft Corporation (based in Redmond, Washington, United States) data processing activities: information technology services (ii) EFFECTIVE GROUP Zrt. (2083 Solymár, Katona József utca 15.) data processing activities: IT services (iii) QuickBase Inc. (255 State Street Boston, MA 02109) data processing activity: IT service, QuickBase-based systems operation (iv) Denxpert EHS&S software Korlátolt Felelősségű Társaság (1037 Budapest, Seregély Street 6) data processing activity: IT service (v) Iron Mountain Magyarország Kft. (1093 Budapest, Czuczor utca 10. IV. and V.) data processing activities: archiving services (vi) Justice Security Kft. (1131 Budapest, Rokolya Street 1-13, 5th floor) data processing activity: Security services, alcohol testing, package inspection, package presentation, tool list, warehouse inspection (vii) Bárczy és Társa Mérnöki Kereskedelmi és Szolgáltató Kft. (7100 Szekszárd, Hunyadi Street 6/B) data processing activity: Operation of the LOTO system (viii) TOMFIX BT. (7632 Pécs, Szabó Ervin Square 9, 5th floor, 16.) data processing activity: SIS operator (access control system, license plate registration) (ix) ECIP Kft. (1134 Budapest, Váci Road 47/B, Ü-1) data processing activity: Protection of critical system elements (x) Oracle Corporation (2300 Oracle Way Austin, TX 78741, USA) data processing activity: JDE operator

	(xi) Freerun Media Kft. (2000 Szentendre, Barackvirág Street 31) data processing activity: Participation in the creation and public release of image films (xii) ENNOV Group (149 avenue de France 75013 Paris, France) data processing activity: Operation of the C-QMS system (xiii) Merat Kft. (1202 Budapest, Csoma Street 9) data processing activity: Operation of ELLA/ELEMER systems (xiv) C Controls PFS Kft. (2724 Újlengyel, Határ Road 12) data processing activity: Providing technical on-call service (xv) LINDE GÁZ Magyarország Zrt. (9653 Répcelak) data processing activity: Operation of the Sintesy system at the Monor site (xvi) ELSZÖV-Automatika Kft. (1106 Budapest, Kabai Street 1) data processing activity: Operation of the BMS system (xvii) Coupa Software, Inc. (950 Tower Lane, 20th Floor, Foster City, CA 94404, United States) data processing activity: Operation of the C-Buy system (xviii) DocuSign France (9-15, rue Maurice Mallet 92130 Issy-les-Moulineaux – FR) data processing activity: Operation of the DocuSign system
<i>Data transfers to third countries</i>	The controller transfers personal data to the US, to US processors identified in the previous point for the purposes of carrying out the processing activities. In all cases, the legal basis for the processing is the EU-US Data Privacy Framework, and the processors are listed on the Data Privacy Framework List of companies offering appropriate safeguards.
<i>Automated individual decision-making</i>	The data controller does not use automated decision-making procedures based solely on automated processing pursuant to Art. 22. of the GDPR.
<i>Profiling</i>	The data controller does not use profiling in relation to personal data relating to the employee.
<i>Legal remedy</i>	In relation to the legality of data processing, you can contact either the Data Protection Authority in charge: the Commission Nationale de l'Informatique et des Libertés (3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, FRANCE; +33 (0)1 53 73 22 22), or by using the web form https://www.cnil.fr/fr/plaintes, or the Hungarian Data Protection Authority: the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11. 9., 1363 Budapest, website: www.naih.hu, telephone: +36 (1) 391-1400, fax: +36 (1) 391-1410, central e-mail address: ugyfelszolgalat@naih.hu) or, at your option, to the court of your domicile (domestic residence) or of the place of establishment of the controller. We recommend You to contact the data protection officer of the joint controllers, i.e. the Ceva Group, before You contact the National Authority for Data Protection and Freedom of Information or the relevant court.
<i>Data Protection Officer</i>	Contact details of Ceva Group Data Protection Officer: • using the web form: https://www.ceva.com/privacy-policy/#privacy-contact • by e-mail: privacycompliance@ceva.com • by post: the addresses of the Data Controllers indicated above