

## Data Protection Information

This informative document represents how and what type of data are recorded in case of using the call center, what is the objective of their processing, sharing or transmitting.

### Data Processing Principles

The data processing of Duna-Dráva Cement Kft. (2600. Vác, Kőhidpart dűlő 2. Cg. 13-09-060842) is performed in an objective related manner, in the appropriate extent required for the achievement of the objective and complying with the integrity and legitimacy principles in each phase of the data processing.

### Data Processing Objective

Duna-Dráva Cement Kft. records the calls arriving at the call center (0627-511-750) for the purpose of the exact determination, control, utilization, modification, performance, invoicing of the orders, and in order to execute other quality control, training related and statistical analyses, as well.

The call center clerk at each call tells that he/she is speaking in the name of the Duna-Dráva Cement Kft., that the conversation is recorded, informs on the duration of data storage, and also that further information are available at our web-site.

In each case, a recording is prepared about the calls arriving through the call center. A concerned person can be any specific natural person, identified based on its personal data or identified directly or indirectly, and in this way the range of the concerned people may include:

- employee of a contracted partner (buyer, goods receiver)
- employee of a forwarder sub-contractor
- employee of Duna-Dráva Cement Kft.
- other external natural or legal person

Act no. 112 of 2001 referring to the freedom of information self-determination right and freedom of information (hereinafter referred to as InfoAct) specifies the basic rules relating to the processing of data.

### InfoAct Requirements, Interpretative Provisions:

Acc. to Point 2 of §3: *personal data*: “are data which can be connected to the concerned person – in particular name, ID number, and one or several knowledge being characteristic to its physical, physiological, mental, economic, cultural or social identity – and consequences derivable from the data referring to the concerned person.”

Acc. to Point 9 of §3 the *controller*: „is a natural or legal person, or an organization not having a legal personality, who or which independently or together with others determines the objective of data processing, takes and executes/or makes executed by the data processor the decisions referring to data processing (including the utilized tool, as well);”

Acc. to Point 10 of §3 *data processing*: „is – independently on the applied procedure – any operation or totality of operations executed on the data, in particular their collection, registration, recording, systemization, storage, modification, utilization, query, forwarding, publication, co-ordination or connection, blocking, cancellation and destruction, furthermore the prevention of further processing of

data, preparation of photo, sound or visual records, and recording of physical characteristics (like fingerprint or palm print, DNA sample, iris image);”

### Legal Base of Data Processing

Data processing of Duna- Dráva Cement Kft. (hereinafter referred to as Data Processor) is based on the consent of the concerned persons, and we ask for and process – based on the voluntary consent of the calling person – only such personal data, which are absolutely necessary for the performance of the utilized or requested service. In case of contacting our call center, the conversations are recorded and retained for 5 years.

“In case you do not agree to the recording of the conversation - thus do not wish to resort to the call center –, then you might want to send your order, request, observation or complaint to our Company in writing to the e-mail address [fszervezes@duna-drava.hu](mailto:fszervezes@duna-drava.hu) or the following address: 2600 Vác, Kőhídpart dűlő 2.”

### Description of Data of Concerned Persons

In case of call of an external natural person, his/her sound is recorded, but we do not process, record additional data of the private person. Exclusively the name and contact information of persons acting on behalf of legal entities are recorded.

We process, store the following data of legal persons, companies:

- Company name
- Seat address
- Branch and plant address
- Company registration number
- Tax ID
- Bank account number
- Name, contact information of the administrator

#### Delivery data

- Consignor’s data (name, address, contact information)
- Consignee’s data (name, address, contact information)
- Carrier’s data (name, license plate number)
- Data of product (description, quantity)

In addition to the data transmitted by phone, the Sales Contract, the Freight Contract, data declared during the ORP registration, or information given through the call center are the data resources. (master data of SAP system).

### Data Handling, Data Processing, Data Transmission

The employees of Duna-Dráva Cement Kft. can access the data given to the call center or known based on the above resources based on the user entitlements specified in the internal rules of Duna-Dráva Cement Kft.

Performance of the orders is realized with the assistance of forwarding agents, carrier companies. During the performance of an order, the data are supplied to the assisting organizations (forwarding agents, carrier companies) to the extent being minimally required for the full performance of the

orders. The businesses, to which the data required for the performance of the order are transmitted, are considered as data processors according to the provisions of the InfoAct. During the order, the concerned party becomes aware of them and agrees on transmitting the data to them. At request, information referring to the data processing person is available at our Logistics Department.

The call center staff sees and can access the data related to and required for the performance of the order, and the data added by the contracted buyer's credit line. The data are transmitted by phone, SMS, e-mail or through the own developed programs of Duna-Dráva Cement Kft.

Data transmission abroad is executed in case for the performance of the order a foreign contractor is involved (e.g. a foreign carrier company). SAP data are stored on servers located in Germany and owned by Heidelberg Cement AG, but the audio materials are saved to a server located in Hungary (Vác).

#### Listening of Recordings:

A range of employees of Duna-Dráva Cement Kft. - as specified in the internal rules - is entitled to listen the recordings (appointed persons, certain workers of the IT and Logistics departments).

Listening of the recordings is also necessary for quality assurance and training purposes, external training company is also entitled to such listening exclusively through Duna-Dráva Cement Kft. and under conditions specified in other contracts.

At the request of the interested persons, we ensure the availability of the recording's copy including what was said both by the concerned person and the clerk.

#### Data Safety

According to the provisions of InfoAct, the data manager, and in his/her scope of activity the data processor, as well, is obliged to take care of the data safety, furthermore must take those technical and organizational actions and develop those procedure rules, which are required for the enforcement of the InfoAct provisions and of the rules of additional data and secrecy protection regulations.

For the protection of the data – particularly against the unauthorized access, modification, transmission, publication, cancellation or destruction, and the unintentional destruction and damage, and becoming inaccessible due to change of applied technics - Duna-Dráva Cement Kft. introduced significant technical and organizational measures.

Data transmission is performed through the internal network of Heidelberg Cement Group. The internal network is operated by the British Telecom. The points - where it is possible to connect to this internal network - are protected by standard network protection tools. It is protected by Cisco firewalls against external intrusion, or the internal company resources can be accessed by the establishment of a VPN (Virtual Private Network) connection.

#### Rights of Concerned Persons and their Enforcement:

According to the provision of InfoAct, the concerned person can request:

- a) information referring to handling of his/her personal data,
- b) correction of his/her personal data, and
- c) cancellation or blocking his/her personal data, except for the obligatory data processing.

At the request of the concerned person, Duna-Dráva Cement Kft. provides information on the concerned person's data handled by it, or processed by it or by the data processing organization

authorized by it under its commission, on the resources of them, the purpose of data processing, its legal basis, duration, name and address of the data processor and its activity relating to the data processing, on the circumstances of data protection incident, its effects and the measures taken for their elimination, furthermore – in case of transmitting personal data of the concerned person – on the legal base and addressee of the data transmission.

#### Objection against Personal Data Processing

According to the provision of InfoAct, the concerned person can protest against the processing of his/her personal data,

- a) in case the processing and transmission of the personal data is necessary exclusively for the performance of the data processor's legal obligation, or for the enforcement of the data recipient's or third party's justifiable interest, except the case of obligatory data processing;
- b) in case the utilization or transmission of the personal data is performed for the purpose of direct marketing, public opinion research or scientific research, and
- c) in other cases specified by the Act.

Duna-Dráva Cement Kft. examines the objection within the possible shortest period of time from the date of its submission, but maximum within 15 days, takes decision referring to its substantiation, and informs the applicant in writing on its decision.

If Duna-Dráva Cement Kft. establishes the substantiation of the concerned person's objection, it terminates the data processing – including further data collection and transmission, as well – and blocks the data, and informs on the objection and the measures taken on the basis of that all those parties, to which earlier the data concerned by the objection were transmitted, and which are obliged to take actions in the interest of the enforcement of the objection right.

#### Correction, Cancellation of Data

At the request of the concerned persons, Duna-Dráva Cement Kft. corrects in its records their data according to the conditions included in the InfoAct.

Regarding the correction, modification of the recorded (contractual) master data, our customers, goods recipients can contact the competent area representative, while our carrier partners can contact the Logistics Department.

In case you called Duna-Dráva Cement Kft. for other purpose – e.g. request for information – and you do not want Duna-Dráva Cement Kft. to retain the recording for five years, please, send your written request to delete the recording to the attention of our Logistics Department at the following address: 2600 Vác, Kőhidpart dűlő 2.

In case of any question, comment, complaint we await your letter at the following e-mail address: [logisztika@duna-drava.hu](mailto:logisztika@duna-drava.hu) .

In case of needing legal remedy, the concerned persons can contact the National Data Protection and Information Freedom Authority (1125 Budapest, Szilágyi Erzsébet fasor 22/c.) and court, as well.

Vác, 1<sup>st</sup> June 2016.

Duna-Dráva Cement Kft.