

PRIVACY POLICY FOR SECURITY CAMERA SURVEILLANCE AND ACCESS CONTROL

1. Introduction – Purpose of the Policy

During its operations, **RUAG Ammotec Magyarországi Zrt.** (Registered seat: H-3332 Sirok, Belső gyártelep 1002/35; “**RUAG HU**” or “**we**”), performs activities related to the use, manufacturing, storage and transportation of explosive and/or flammable materials at its registered seat (“**Registered Seat**”) located at H-3332 Sirok, Belső gyártelep 1002/35. Pursuant to Act CLIX of 1997 on Armed Security Guard, Nature Guard and Rural Guard Services (“**Act on Armed Security Guard Services**”), RUAG HU is required to guard the facilities and operations at its Registered Seat using an armed security guard service. The guarding method is a combination of security tools and security guard services.

During its operation and the performance of its guarding obligation, RUAG HU uses an access control system (“**Access Control System**”) and an electronic surveillance system (“**Security Camera System**”), which involve processing of personal data. Access Control System means the process whereby the armed security guards stop persons entering the premises of the Registered Seat, verify and record the data specified in this security camera surveillance and access control privacy policy (“**Policy**”), and escort them to their destination within the premises.

The aim of this Policy is to present how RUAG HU ensures the protection of the personal data of data subjects in the context of data processing related to the operation of the Security Camera System.

This Policy has been developed taking the provisions of, among others, the General Data Protection Regulation of the European Union (“**GDPR**”), Act CXII of 2011 on Informational Self-Determination and Freedom of Information (“**Privacy Act**”), Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (“**Security Services Act**”) and the Act on Armed Security Guard Services, as well as the applicable recommendations of and information provided by the Hungarian National Authority for Data Protection and Freedom of Information into account.

The terms used in this Policy are used in the meaning assigned to them in Article 4 of the GDPR.

2. Scope of the Policy

The scope of this Policy covers all **employees** of RUAG HU (“**Employees**”) as well as all private individuals performing activities at RUAG HU **under a legal relationship for employment or under a contract for services or an agency agreement** (e.g. temporary workers, students, etc.).

The scope of the Policy also covers RUAG HU’s **suppliers** and **other business partners, visitors** and **all private individuals that enter or intend to gain entry** to the premises of RUAG HU’s Registered Seat. Persons covered the scope of the Policy who are not employees of RUAG HU are referred to as “**Other Data Subjects**”.

3. The controller, the operator of the Access Control System and the Security Camera System and their contact details

The Access Control System and the Security Camera System are operated by RUAG HU as controller. The contact details of RUAG HU are as follows:

Name: RUAG Ammotec Magyarországi Zrt.
Registered Seat: H-3332 Sirok, Belső gyártelep 1002/35
Company registration number: 10-10-020197
Telephone: +36 36 561 303
Fax: +36 36 561 027
Website: www.ruag.com
Email address: sirok.ammotec@ruag.com

The Access Control System and the Security Camera System are operated by the armed security guard service established by RUAG HU in compliance with legal requirements and employed under an employment relationship (Section 1 (1) c) of the Act on Armed Security Guard Services). Pursuant to the Act on Armed Security Guard Services, in the context of capturing video camera footage, the **armed security guard service** is qualified a controller (Section 9/A (1) of the Act on Armed Security Guard Services).

Pursuant to Article 37 of the GDPR, RUAG HU is not required to designate a data protection officer.

4. Purpose of the use of the Security Camera System and the Access Control System

4.1 *The purpose of the use of the Security Camera System is as follows:*

- to fulfil the obligations related to armed security guard service, including the protection of the site of the facility, the guarding of hazardous materials, the prevention of contingency events, the mitigation of the consequences thereof, assistance in the related investigations, the detection of breaches, the catching of perpetrators in the act and the prevention of breaches;
- to protect other valuable assets, goods, raw materials and valuables owned and held by RUAG HU, to prevent any breaches relating thereto, and to furnish evidence in any related official proceedings;
- to protect human life, physical integrity and personal freedom;
- to investigate potential acts or omissions affecting the assets of RUAG HU, as employer, in the course of work performed by employees and, if necessary, instituting relevant disciplinary actions and legal consequences;
- to ensure safety at work and to prevent workplace accidents and instituting relevant disciplinary actions and legal consequences in the case of breach of rules regarding safety at work;
- to protect business secrets (especially to protect technology).

4.2 *The purpose of the use of the Access Control System is as follows:*

- to fulfil the obligations related to armed security guard service, including the protection of the site of the facility, the guarding of hazardous materials, the prevention of contingency events, the mitigation of the consequences thereof, assistance in the related investigations, the detection of breaches, the catching of perpetrators in the act and the prevention of breaches;
- to protect other valuable assets, goods, raw materials and valuables owned and held by RUAG HU, to prevent any breaches relating thereto, and to furnish evidence in any related official proceedings;
- to protect human life, physical integrity and personal freedom;
- to identify persons entering the premises of the Registered Seat, and to manage their entry and exit.

5. Method of the use of the Security Camera System and the Access Control System

The Security Camera System and the Access Control System are used in manner respecting human dignity, purely for the purposes specified in Section 4, and processing is not aimed at monitoring the conduct and habits of RUAG HU's Employees or other Data Subjects or influencing their behaviour.

The location and fields of view of the cameras were determined in a manner ensuring that the cameras are pointed at areas covered by the purposes of the various cameras as detailed below, and surveillance is carried out only to the extent needed for such purpose. The locations, fields of view and the purpose of the placement of cameras as well as the method of surveillance are detailed in the table below.

The Security Camera System provides surveillance of the following areas:

Camera number	Purpose of the placement of the given camera (the letters indicate the purpose of the use as listed in Clause 5 above)	Location (which building, room, etc.)	Subject of surveillance (which area and object is the camera pointed at)	Method of surveillance (direct or recorded surveillance)
28.	A, B, C, D, E	external reception desk	entrance gate	fixed
27.	A, B, C, D, E	external reception desk	forecourt of the barrier	fixed
6.	A, B, C, D, E	South- west part of Building No. 25 external	barrier – Building No. 34	fixed
7.	A, B, C, D, E	South- west part of Building No. 25 external	driveway	fixed
8.	A, B, C, D, E	South- east part of Building No. 25 external	waste storage facility	fixed

9.	A, B, C, D, E	South- east part of Building No. 25 external	back door of the scheduled preventive maintenance - corridor	fixed
21.	A, B, C, D, E	East part of Building No. 25 internal	built storage internal part	fixed
10.	A, B, D	North- west part of Building No. 25 external	icycle storage	fixed
5.	A, B, C, D, E	Building No. 25 internal	corridor of the scheduled preventive maintenance – automatic machine	fixed
11.	A, B, C, D, E	North part of Building No. 25 external	towards the gate, main entrance of the building and the fence line	fixed
4.	A, B, C, D, E	Office entrance of the Building No. 34	corridor of the offices leading to the plant	fixed
39.	A, B, C, D, E	North- west part of Building No. 34 external	storage No.6	fixed
40.	A, B, C, D, E	North- west part of Building No. 34 external	plant Nr. 13	fixed
38.	A, B, C, D, E	North- west part of Building No. 34 external	storage No. 12	fixed
45.	A, B, C, D, E, F	North- east part of Building No. 34 internal	middle of the internal plant	fixed
46.	A, B, C, D, E, F	South- east part of Building No. 34 internal	middle of the internal plant	fixed
94.	A, B, C, D, E, F	South part of Building No. 34 internal	middle of the internal plant	fixed
24.	A, B, C, D, E, F	North part of Building No. 34 internal	middle of the internal plant	fixed
95.	A, B, C, D, E, F	Cops part of Building No.34	middle of the plant	fixed

25.	A, B, C, D, E, F	North part of Building No. 34 internal	middle of the central plant	fixed
23.	A, B, C, D, E, F	South part of Building No. 34 internal	middle of the central plant	fixed
26.	A, B, C, D, E, F	South-east part of Building No. 34 internal	middle of the central plant	fixed
43.	A, B, C, D, E, F	North-west part of Building No. 34 internal	middle of the central plant	fixed
99.	A, B, C, D, E	East part of Building No.8	towards the building	fixed
98.	A, B, C, D, E	South part of Building No.8	towards the building	fixed
86.	A, B, C, D, E	North-east part of Building No.12	towards the east entrance of the storage facility	fixed
88.	A, B, C, D, E	North part of Building No.12	Building No. 13	fixed
87.	A, B, C, D, E	North part of Building No.12	front ramp of Building No. 12	fixed
83.	A, B, C, D, E	West part of Building No.12	front ramp of Building No. 12	fixed
84.	A, B, C, D, E	West part of Building No.12	entrance of the storage for made-up articles	fixed
85.	A, B, D	South part of Building No.12	back of the building	fixed
97.	A, B, C, D, E	Fence of the storage Building No. 8/A	entrance of the Building No. 8/A	fixed
18.	A, B, C, D, E	Water storage column	North-east entrance of Building No.7	fixed
17.	A, B, C, D, E	North part of Building No.7 external	towards Building No.26	fixed
16.	A, B, C, D, E	North part of Building No.7 external	towards Building No.26	fixed
15.	A, B, C, D, E	North part of Building No.7 external	towards Building No.26	fixed

22.	A, B, C, D, E	West part of Building No.7 external	damper storage	fixed
93.	A, B, D	South part of Building No.7 external	back of the building	fixed
20.	A, B, D	South part of Building No.7 external	back of the building	fixed
19.	A, B, D	South part of Building No.7 external	back of the building	fixed
61.	A, B, C, D, E, F	Building No. 7 traditional filling facility	Swiss filling tool	fixed
60.	A, B, C, D, E, F	Building No. 7 Swiss filling facility	Swiss filling tool	fixed
62.	A, B, C, D, E, F	Building No. 7 fore room of the filling facility	filling tool for animal shooting	fixed
59.	A, B, C, D, E, F	Building No. 7 filling facility for animal shooting	row for animal shooting	fixed
89.	A, B, E	fore room of the packaging facility	middle of the facility	fixed
92.	A, B, D, E, F	rearmost part of the packaging facility	middle of the facility	fixed
90.	A, B, C, D, E, F	packaging facility	filling machines	fixed
57.	A, B, C, D, E, F	middle of the filling facility	corridor of the filling machines	fixed
91.	A, B, C, D, E, F	middle of the filling facility	rotor filler	fixed
56.	A, B, C, D, E, F	End of the filling facility – exit	corridor of the rotor filler	fixed
53.	A, B, C, D, E, F	damper facility-internal	towards the machines	fixed
54.	A, B, C, D, E, F	damper facility- central	towards the machines	fixed
55.	A, B, C, D, E, F	damper facility- first part	towards the machines	fixed

58.	A, B, C, D, E, F	Swiss damper facility	towards the machine	fixed
76.	A, B, D	North-east part of Building No.26/A external	side of the building	fixed
75.	A, B, D	North part of Building No.26/A external	side and offset of the building	fixed
74.	A, B, D	North-west part of Building No.26/A external	behind the building	fixed
79.	A, B, C, D, E	West part of Building No.26/A external	emergency exit	fixed
78.	A, B, C, D, E	South-west part of Building No.26/A external	parking lot - lock	fixed
77.	A, B, C, D, E	East part of Building No.26/A external	parking lot - lock	fixed
63.	A, B, C, D, E	End of the internal corridor of Building No.26/A	towards the entrance	fixed
64.	A, B, C, D, E	In front of the wath-post in Building No.26/A	metal control gate	fixed
65.	A, B, D, F	Building No.26/A internal	Assembling inner area	fixed
66.	A, B, C, D, E	Raw material storage in Building No.26/A	the lock	fixed
67.	A, B, C, D, E	Lock facility in Building No.26/A	towards the door	fixed
47.	A, B, C, D, E	Lock facility in Building No.26/A	Territory of the lock	fixed

48.	A, B, C, D, E, F	Lock facility in Building No.26/A	territory of the table for takeover	fixed
68.	A, B, C, D, E	26/A ép. Készárú raktár storage for made-up articles in Building No.26/A	storage for made-up articles	fixed
69.	A, B, D, F	Building No.26/A internal	Assembling inner area	fixed
70.	A, B, D, F	Building No.26/A internal	towards the storage for made-up articles	fixed
71.	A, B, D	Building No.26/A internal	towards the entrance of the storage	fixed
52.	A, B, C, D, E	above the storage for gas containers	south and west side of Building No. 26/A	fixed
72.	A, B, C, D, E	Preparation facility	Inner area, doors	fixed
80.	A, B, C, D, E	Assembling facility	Assembling inner area, doors	fixed
81.	A, B, C, D, E	shooting facility	fore room for fire-bay	fixed
82.	A, B, C, D, E	shooting facility	fore room for fire-bay	fixed
73.	A, B, C, D, E	Corridor of the shooting range	Corridor	fixed
33.	A, B, D	external entrance of the building for ballistics	fore room of the entrance	fixed
34.	A, B, C, D, E	North part of the building for ballistics external	staircase next to the building	fixed
31.	A, B, C, D, E	North-west part of the building for ballistics external	Yard gate	fixed
29.	A, B, C, D, E	South-west part of the building for ballistics external	firing range - exit	fixed

32.	A, B, D	South part of the building for ballistics external	rearmost part of the building	fixed
30.	A, B, D	Building for ballistics corridor on the floor	corridor on the floor	fixed

Cameras for building No. 10:

Camera number	Purpose of the placement of the given camera (the letters indicate the purpose of the use as listed in Clause 5 above)	Location (which building, room, etc.)	Subject of surveillance (which area and object is the camera pointed at)	Method of surveillance (direct or recorded surveillance)
1.	A, B, C, D, E	North-east side of the press shop, indoor space	Towards the passage way door	fixed
2.	A, B, C, D, E	Press shop, indoor space, above the entrance	Entrance door-batter	fixed
3.	A, B, C, D, E	East side of the press shop, indoor space	Indoor space, towards the entrance	fixed
4.	A, B, C, D, E	West side of the press shop, indoor space	towards the working machineries	fixed

The cameras operate continuously, with the exception of the camera for Building No. 10, which is equipped with a motion sensor. Turning off or blocking the cameras or hindering recording by any means is prohibited.

The angle of the camera no. 48 is set in a way that no employees are recorded or they are recorded in an unidentifiable way only.

6. Information displayed regarding the use of the Security Camera System

RUAG HU has displayed warning signs at the gate/concierge service providing entry to the premises of the Registered Seat and at Building 10 showing that there is an electronic surveillance system on the premises.

This Policy is also displayed at the same locations.

7. Categories and sources of personal data obtained from the Security Camera System and processed during the operation of the Access Control System

7.1 *The following personal data may be processed during the operation of the Security Camera System:*

Face and image of Employees and Other Data Subjects, as well as video recordings obtained from the Security Camera System.

7.2 *The following personal data may be processed during the operation of the Access Control System:*

- name of persons entering;
- place and date of birth;
- time of entry and exit;
- registration plate number and model of vehicle used;
- number of personal document showed for the purpose of identification;
- if the above document was not issued by a Hungarian authority, the name of the country of issue;
- purpose of the visit;
- the target area visited;
- type of authorisation for entry (permanent/daily).

8. Purpose of use of the footage from the Security Camera System and the personal data processed during the operation of the Access Control System

Footage from the Security Camera System and the personal data processed during the operation of the Access Control System may only be used for the purpose of identifying or investigating events corresponding to the specific purpose of processing as specified in Section 4 above (e.g. breaches), or for the enforcement of related claims.

9. Legal basis for data processing

The legal basis for data processing in the case of both Employees and Other Data Subjects is the legitimate interest of RUAG HU (Article 6 (1) f) of the GDPR). RUAG HU has a **legitimate interest** in protecting the physical integrity of buildings, assets, materials and persons, protecting information and business secrets, and in detecting and preventing breaches. RUAG HU has supported this legitimate interest, as a legal basis, with a legitimate interest balancing test.

10. Who has access to footage from the Security Camera System and the personal data processed during the operation of the Access Control System?

10.1 *Footage from the Security Camera System* may be accessed by the following persons, for the purposes and with the frequency specified below:

(a) Within RUAG HU:

Division/department staff (position within RUAG HU)	Specific purpose of viewing footages	Frequency of viewing footages
Managing Director, senior executive of the relevant function, HR Manager	Investigation of the suspected breach or criminal offence, or any other unlawful acts or omissions Investigation of workplace accidents	on an ad-hoc basis
Authorised IT staff member	On-site repair/maintenance of the Security Camera System	on an ad-hoc basis
members of the armed security guard service	Investigation of the suspected breach or criminal offence, or any other unlawful acts or omissions, prevention of breach or criminal offence, or any other unlawful acts or omissions	on an ad-hoc basis

(b) Outside of RUAG HU:

Persons authorised to view footages (insert position)	Specific purpose of viewing footages	Frequency of viewing footages
RUAG Ammotec GmbH (90765 Fürth, Kronacher Straße 63, Germany) IT Department	Maintenance of the server of the Security Camera System	on an ad-hoc basis

Repairing the Security Camera System is the responsibility of “Falcon 90” Biztonságtechnikai Szerelő és Szolgáltató Bt. However, the company has no access to footages, including personal data, during the performance of their responsibilities.

10.2 The following persons may access *personal data processed during the operation of the Access Control System*:

Division/department staff (position within RUAG HU)	The personal data they have access to	Operations they perform
members of the armed security guard service	All data specified in Section 7.2	Comprehensive processing
Managing Director, HR Manager	All data specified in Section 7.2	Access, storage, transfer, use

11. Transmission of footage from the Security Camera System and the Access Control System

Footages from the Security Camera System and the personal data processed during the operation of the Access Control System may be transmitted/made available to the following further categories of recipients:

- As required by law, footages may be transmitted to the persons, bodies, courts or authorities specified in this document, in compliance with their statutory obligations. Furthermore, footages may also be transmitted or made available upon request by the courts or the authorities.
- Footages may be transmitted to third parties, bodies, courts or authorities if required for the enforcement of the rights, ownership or security of RUAG HU or the RUAG Group, their employees or their members.

12. Duration, place and method of the storage of footages from the Security Camera System and personal data processed during the operation of the Access Control System

12.1 Footage from the Security Camera System is stored electronically, on a separate server. Any footage not used will be erased after 60 days from recording, in line with Section 9/A (3) b) of the Act on Armed Security Guard Services.

In the event of use of the personal data by RUAG HU, footages will be erased no later than within 10 business days of the final completion of the claims enforcement procedure for which they were used. If no claims are enforced in relation to the use of personal data, personal data are erased no later than within 10 business days from the end of the limitation period of the legal claim providing grounds for the use thereof.

If the footages are not used by RUAG HU, but a person as specified in Section 9/A (4) of the Act on Armed Security Guard Services (whose rights or legitimate interest are affected by the footage), or a court, the prosecutor's office, an authority or a body makes a request within 60 days from the date of recording to RUAG HU not to destroy said footages, RUAG HU will erase such footages after 30 days from the submission of such request if the footages have not been used. Use means that the person concerned or the court or the authority requests the release of the footages pursuant to the

provisions of the Act on Armed Security Guard Services. If the footages are used within 30 days of the submission of the blocking request, they will be promptly erased.

- 12.2 Personal data processed during the operation of the Access Control System can be stored electronically or in hard copy format, depending on the number of the persons entering the Registered Seat at the same time. Any such personal data not used will be erased on the 31st days from recording, in line with Section 9/B (6) of the Act on Armed Security Guard Services.

In the event of use of the personal data by RUAG HU, they will be erased no later than within 10 business days from the final closure of the claims enforcement procedure for which they were used. If no claims are enforced in relation to the use of personal data, personal data are erased no later than within 10 business days from the end of the limitation period of the legal claim providing grounds for the use thereof.

If the personal data are not used by RUAG HU, but a person as specified in Section 9/B (4) of the Act on Armed Security Guard Services (whose rights or legitimate interest are affected by the footage) or a court, the prosecutor's office, an authority or a body makes a request within 30 days from the date of recording to RUAG HU not to erase said personal data, RUAG HU will erase such personal data on the 31st days of the submission of such request, if they have not been used. Use means that the person concerned or the court or the authority requests the release of the footages pursuant to the provisions of the Act on Armed Security Guard Services. If the personal data are used after submission of the blocking request, the footages will be promptly erased.

13. Data security measures relating to the footages and the personal data processed during the operation of the Access Control System

The data from the Security Camera System may only be accessed by persons granted authorisation under this Policy, and after the expiration of the storage period, unused data from the Security Camera System will be automatically erased (overwritten).

Personal data processed during the operation of the Access Control System may only be processed by persons granted authorisation under this Policy. The documents in paper format are stored separately.

The personal data are stored in a protected computer network which is protected by armed security guard service.

14. Transfer of personal data to third countries

No data transfer takes place to third country recipients in relation to the use of the Security Camera System or the personal data processed during the operation of the Access Control System.

15. Automated decision-making, including profiling

No decision based solely on automated processing will be made in relation to personal data processed during the use of the Security Camera System or the operation of the Access Control System.

16. Consequences of failure to provide data

The legal basis for data processing related to the operation of the Security Camera System and the Access Control System is the legitimate interest of RUAG HU. If the Data Subject objects to processing, RUAG HU – in the event the objection is raised by an employee – will not be in a position to establish an employment relationship or maintain the existing employment relationship given that said Employee will not be able to enter the premises of the Registered Seat and thus will not be able to perform their work-related obligations, and RUAG HU cannot make an exemption concerning its legitimate interest in property protection. If Other Data Subjects object to processing, RUAG HU will not be in a position to allow them entry to the premises of the Registered Seat and RUAG HU cannot make an exemption concerning its legitimate interest in property protection.

Rights of Employees and Other Data Subjects

They may request from RUAG HU

- a) **access to their personal data** (Article 15 of the GDPR). In this regard, they are entitled to obtain information as to whether or not personal data concerning them are being processed, and, where that is the case, access the personal data (including obtaining copies) and information relevant from a data protection perspective (e.g. categories of recipients, duration of storage, safeguards relating to international data transfers, etc.);
 - b) **rectification of their personal data** (Article 16 of the GDPR); In this regard, they are entitled to request rectification of incorrect data or the completion of incomplete data;
 - c) to request **erasure of their personal data** (Article 17 of the GDPR);
 - d) to request **restriction of processing** (Article 18 of the GDPR);
 - e) to request – within 60 days of the making of the footages, or in the case of personal data processed during the operation of the Access Control System within 30 days of recording – that the controller not destroy or erase the data. In order to submit such a request, the Data Subject must furnish proof of their legitimate interest in the retention of the footages. In the absence of any use within 30 days of the submission of such request, the footage containing personal data will be promptly destroyed.
- The Employees and Other Data Subjects are entitled **to object to processing** that is based on the legitimate interest of RUAG HU. However, it should be noted that in the event of such objection, RUAG HU will not be in a position to establish an employment relationship or maintain the existing employment relationship or allow Other Data Subjects entry to the premises of the Registered Seat.
 - The request for the exercise of the above rights may be submitted to RUAG HU using the contact details specified in Section 3 above. RUAG HU will comply with the request within the shortest time possible, but within 25 days at the latest, and notifies the relevant data subject of the measures taken or the reasons for the rejection of the request.
 - **Right to lodge complaints:** Data subjects have the right to lodge complaints with the Hungarian National Authority for Data Protection and Freedom of Information (H-1125 Budapest, Szilágyi Erzsébet fasor 22/C; website: www.naih.hu; email: ugyfel-szolgalat@naih.hu; phone: + 36 1 391 1400). Before lodging a complaint to an authority, you are recommended to submit such complaint to RUAG HU to enable us to investigate your request first.

- **Judicial remedy:** In the event of an infringement of their rights, the data subject is entitled to seek judicial remedy against RUAG HU. Ruling in the matter falls under the jurisdiction of the regional court. Actions may be brought, at the data subject's option, before the competent regional court where the data subject is living or residing.

17. CLOSING PROVISIONS

This Policy enters into force on 1st of May 2020. RUAG HU is entitled to unilaterally amend this Policy upon providing information on such amendments to Employees and Other Data Subjects and, furthermore, to repeal this Policy at any time.