

Complying with the **special local requirements** of the Hungarian National Authority for Data Protection and Freedom of Information on the obligation to inform on data processing, **RUAG AMMOTEC MAGYARORSZÁGI ZRT** (hereinafter "RUAG HU" or "us") hereby provides you with the this local privacy notice ("**Local Privacy Notice**").

This Local Privacy Notice applies to any processing of personal data in connection with all our business activities in all our business areas. Please note that separate company-wide and local privacy notices may apply, for example for employees, applicants and participants at trade fairs, job fairs and similar events. These policies are available at [www.ruag.com/privacy](http://www.ruag.com/privacy).

**This Local Privacy Notice supplements the RUAG Privacy Notice** <https://www.ruag.com/en/privacy>, which also applies to the processing of your personal data, unless otherwise specified in this Local Privacy Notice.

## 1 Who we are - Name and contact details of the local controller

RUAG HU is the controller of your personal data. Contact details of RUAG HU are the following:

**RUAG AMMOTEC MAGYARORSZÁGI ZRT.** (3332 Sirok, Belső gyártelep 1002/35. hrsz. Pf: 9, Telefon: +36 36 561-300; E-mail: [sirok@ruag.com](mailto:sirok@ruag.com))

## 2 Which personal data do we process and for what purpose?

- **Visiting websites, using apps:** Our website is operated by RUAG Corporate Services AG. For the data processing activity regarding the website and apps only the RUAG Privacy Notice applies.
- **Visiting our premises:** When you enter our premises, we may also process your following data: name, name of your company, colleague visited by us, date of your arrival and your departure, ID-number, signature, license plate of your car, work safety tools provided by us, number of your visitor's card, log in data of your card. We may use this data in order to identify you and to ensure safety at our premises.

*Regarding the video recording and access control a separate privacy notice applies which you can find at <https://www.ruag.com/en/privacy>.*

- **Business partners:** We may process your data set forth in Section 3 of the RUAG Privacy Notice in order to enter into or fulfil a contract with your company, and to communicate with your company. In such cases, we obtain your data either from you or from your company.

We process personal data on the following grounds:

- **Communication:** In the case you are contacting us as a private person, the legal basis for processing your personal data may take the form of a contract or the performance of pre-contractual measures with you (Art. 6 (1) (b) GDPR) or your consent (Art. 6 (1) (a) or Art. 9 (2) (a) GDPR). *Please note that by contacting us with any request you give your consent to the processing of your personal data contained in your request (your name, contact details, content and time of the request), for the purpose of processing your request.*

If we communicate with you as a contact person of your company, the legal basis for processing your personal data is our legitimate interests in contacting your company, communication with your company or entering into a contract with the company or in providing a good service based on a balance of interests (Art. 6 (1) (f) GDPR). In such cases, we obtain your data either from you or from your company.

- **Use of email:** In the case we use your name and email address to communicate with you based on your request or to enter into or fulfil a contract concluded by you or your company, the legal basis for “*Communication*” shall apply (see above).

In the case we use your name and e-mail address to send you alerts, updates, event invitations or marketing communications, the legal basis will be your consent (Art. 6 (1) (a) or Art. 9 (2) (a) GDPR).

- **Visiting premises:** The legal basis for processing your personal data 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.
- **Customer events:** Please see our Local Privacy Notice for Trade Fairs and Similar Events
- **Business partners:** Please the legal basis for “*Communication*” (see above).
- **Administration:** The legal basis for processing your personal data is our legitimate interests (Art. 6 (1) (f) GDPR). Our legitimate interest is to get to know our customers better, to improve products and services and to develop new ones.
- **Corporate transactions:** The legal basis for processing your personal data is our legitimate interests (Art. 6 (1) (f) GDPR) in the sale or purchase of companies, parts of companies or other assets.
- **Job applications:** Please see our Local Privacy Notice for Job Applicants
- **Employment:** Please see our Local Employee Privacy Notice
- **Compliance with legal requirements:** The legal basis for processing your personal data is our legitimate interests (Art. 6 (1) (f) GDPR). Our legitimate interest is to make sure that we do not violate any obligations arising from any internal guidelines or bylaws or any legal requirements and to combat fraud, to prevent and investigate offences, to protect customers, employees and other persons and data.
- **Protection of rights:** The legal basis for processing your personal data is our legitimate interests (Art. 6 (1) (f) GDPR). Our legitimate interest is to enforce and defence legal claims.

### 3 Who do we share your personal information with?

#### 3.1 Internal recipients (recipients within RUAG HU)

In principle, within RUAG HU, persons in following positions will have an access to your personal data:

Data processing activity	Position of the employees within RUAG HU who will have access to the data
<b>Communication</b>	Assistant of the general manager, HR generalist, member of the management, commercial agent, representative for environmental affairs, quality support engineer
<b>Use of email</b>	Assistant of the general manager, HR generalist, commercial agent, colleague responsible for the invoices and for the master files
<b>Visiting premises</b>	Please see our Privacy Policy for Security Camera Surveillance and Access Control
<b>Customer events</b>	Please see our Local Privacy Notice for Trade Fairs and Similar Events
<b>Business partners</b>	Member of the management, assistant of the general manager, commercial agent, technologist, assistant for quality management, quality support engineer, representative for environmental affairs, IT specialist, colleague responsible for the invoices and for the master files, accountant, accounting officer, financial controller, accounting administrator
<b>Administration:</b>	Assistant of the general manager, financial controller, colleague responsible for the invoices and for the master files, assistant for quality management
<b>Corporate transactions</b>	Member of the management, accounting officer, assistant of the general manager
<b>Job applications</b>	Please see our Local Privacy Notice for Job Applicants
<b>Employment</b>	Please see our Local Employee Privacy Notice
<b>Compliance with legal requirements</b>	Member of the management, assistant of the general manager, HR generalist
<b>Protection of rights</b>	Member of the management, assistant of the general manager, HR generalist, accounting officer

#### 3.2 External recipient (outside of RUAG HU)

##### 3.2.1 within the RUAG group

The RUAG companies or divisions may have access to the your personal data related to communication, use of email, business partners, administration, corporate transactions, protection of rights for the purposes indicated in the RUAG Privacy Notice and in the Local Privacy Notice. Furthermore, the following RUAG companies or divisions may have access to the your personal data. The list and contact details of the RUAG companies can be found at [www.ruag.com](http://www.ruag.com).

Data processing activity	RUAG company or division	Capacity (processor, or controller)	Activity performed (in case the recipient acts as processor) or purpose of the processing (in case the recipient acts as controller)
<b>Customer events</b>	Please see our Local Privacy Notice for Trade Fairs and Similar Events		
<b>Job applications</b>	Please see our Local Privacy Notice for Job Applicants		
<b>Employment</b>	Please see our Local Employee Privacy Notice		
<b>Compliance with legal requirements</b>	RUAG Corporate Services AG (Schiltwaldstrasse, 6032 Emmen, Switzerland), compliance officer	Data controller	Ensuring compliance with legal requirements

Furthermore, RUAG Corporate Services AG (Schiltwaldstrasse, 6032 Emmen, Switzerland) renders IT services to us. It acts as data processor in order to provide and operate IT tools, including business e-mail, internet, and may monitor communications and network use in order to secure our IT environment and network infrastructure. The duration of access corresponds to the retention period applicable to RUAG HU.

### 3.2.2 outside the RUAG group

The following companies may have access to the your personal data:

Data processing activity	Name, contact details of the recipient	Capacity (processor, or controller)	Activity performed (in case the recipient acts as processor) or purpose of the processing (in case the recipient acts as controller)
<b>Customer events</b>	Please see our Local Privacy Notice for Trade Fairs and Similar Events		
<b>Business partners</b>	KPMG Hungária Kft. (1134 Budapest, Váci út 3. Tel: 06 1 887 6517)	controller	Carrying out of statutory audit
<b>Job applications</b>	Please see our Local Privacy Notice for Job Applicants		
<b>Employment</b>	Please see our Local Employee Privacy Notice		
<b>Compliance with legal requirements</b>	Noerr & Társai Iroda (1011 Budapest, Fő u. 14-18. Tel: 06 1 22 40 900)	controller	Legal counselling and representation

	Dr. Zsuzsa Horváth (1135 Budapest, Csata u. 11. Tel: 06 20 359 1829)		
<b>Protection of rights</b>	Noerr & Társai Iroda (1011 Budapest, Fő u. 14-18. Tel: 06 1 22 40 900)  Dr. Zsuzsa Horváth (1135 Budapest, Csata u. 11. Tel: 06 20 359 1829)	controller	Legal counselling and representation

Further, in the following cases data might be transferred to third parties:

- based on statutory provisions, in order to comply with our statutory obligations data might be transferred to third persons, organs, court or authority, as indicated in the legal provisions. Personal data might be further forwarded or made accessible based on the request made by a court, authority or governmental organ.
- for attorneys, other third parties, organs, court or authority, if it is necessary for the protection of the rights, property or safety of the employees, shareholders of RUAG HU or RUAG HU group company, or the companies themselves.

#### **4 When do we disclose your personal data to third countries?**

In the case of transfer of personal data to a RUAG company outside of the European Union or the European Economic Area, an intra-group data transfer agreement applies, which has been signed by all companies of the group. It makes sure that companies affected apply the standard contractual clauses adopted by the European Commission. The list and contact details of the RUAG companies can be found at [www.ruag.com](http://www.ruag.com).

#### **5 How long do we retain your personal data?**

In the event the processing is based on your consent, we will delete your personal data if your consent is withdrawn. In the event of any legal disputes we store your data until such have been finally and legally binding concluded. We also store your data to the extent that statutory obligations to do so, in particular accounting law document retention obligations exist.

Furthermore, following retention periods shall apply:

Data processing activity	Retention period
<b>Communication</b>	<p>In the case you are contacting us (as a private person or as a contact person of your company) for the purpose of entering into a contract with us and no contract will be concluded, we delete your personal data within 1 (one) month after you have contacted us. In the case you enter into a contract with us, we store your personal data for evidence purposes for the assertion, exercise or defence of any legal claims for a period of five years commencing at the end of the year in which the contract has been terminated.</p> <p>If you contact us with any other request, we will process your data until 1 (one) year commencing at the end of the year in which your request has been completed.</p>
<b>Use of email</b>	<p>In the case we use your name and email address to communicate with you based on your request or to enter into or fulfil a contract concluded by you or your company, the retention period set forth for “<i>Communication</i>” shall apply (see above).</p> <p>In the case we use your name and e-mail address to send you alerts, updates, event invitations or marketing communications, we will store your personal data until you withdraw your consent.</p>
<b>Visiting premises</b>	<p>Please see our Privacy Policy for Security Camera Surveillance and Access Control. The declaration of confidentiality will be stored until 5 (five) years commencing at the end of the year of signing thereof.</p>
<b>Customer events</b>	<p>Please see our Local Privacy Notice for Trade Fairs and Similar Events</p>
<b>Business partners</b>	<p>Please see the retention period set forth for “<i>Communication</i>”.</p>
<b>Administration:</b>	<p>We may store your personal data for a period of 5 (five) years commencing at the end of the year in which we have obtained your personal data.</p>
<b>Corporate transactions</b>	<p>We may store your personal data for a period of five years commencing at the end of the year in which the corporate transaction has been closed.</p>
<b>Job applications</b>	<p>Please see our Local Privacy Notice for Job Applicants</p>
<b>Employment</b>	<p>Please see our Local Employee Privacy Notice</p>
<b>Compliance with legal requirements</b>	<p>We may store your personal data for a period of 5 (five) years commencing at the end of the year in which our contractual relationship with you or with your company ended.</p>

**6 Rights to complain and right to judicial remedy:**

- **Right to lodge a complaint:** You are entitled to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (HU-1024 Budapest, Szilágyi Erzsébet fasor 22/C; website: [www.naih.hu](http://www.naih.hu); e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); tel: + (36)-1-391-1400). Prior to lodging a complaint with the authority we advise you to submit your request to RUAG HU at first in order to enable us to assess your request first.
- **Right to judicial remedy:** In case of a violation of Your rights You are entitled to bring legal proceedings against RUAG HU before court. The legal proceedings shall fall within the competence of the regional court (in Hungarian: "törvényszék"). The legal proceedings may be brought before the regional court of Your permanent or temporary place of residence.