



**Information Notice on the Processing of Personal Data of  
Business Partners, Professional Partners, Contracting Parties  
and related third party Data Subjects**

**In effect from: 2 May 2022**

**1. DATA CONTROLLERS**

**Colas Alterra Építőipari Zártkörűen Működő Részvénytársaság**

Registered seat: H-1113 Budapest, Bocskai út 73.

Mailing address: H-1113 Budapest, Bocskai út 73.

E-mail address: [alterra@colas.hu](mailto:alterra@colas.hu)

Telephone number: +36 1 883 1000

Fax number: +36 1 883 1010

Website: [www.colas.hu](http://www.colas.hu)

**Colas Északkő Bányászati Korlátolt Felelősségű Társaság**

Registered seat: H-3915 Tarcál, Malom utca 10.

Mailing address: H-3915 Tarcál, Malom utca 10.

E-mail address: [eszakko@colas.hu](mailto:eszakko@colas.hu)

Telephone number: +36 1 883 1200

Fax number: +36 36 47 380 236

Website: [www.colas.hu](http://www.colas.hu)

**Colas Hungária Építőipari Zártkörűen Működő Részvénytársaság**

Registered seat: H-1113 Budapest, Bocskai út 73.

Mailing address: H-1113 Budapest, Bocskai út 73.

E-mail address: [hungaria@colas.hu](mailto:hungaria@colas.hu)

Telephone number: +36 1 883 1000

Fax number: +36 1 883 1010

Website: [www.colas.hu](http://www.colas.hu)

**Colas Közlekedésépítő Zártkörűen Működő Részvénytársaság**

Registered seat: H-1113 Budapest, Bocskai út 73.

Mailing address: H-1113 Budapest, Bocskai út 73.

E-mail address: [kozlekedesepito@colas.hu](mailto:kozlekedesepito@colas.hu)

Telephone number: +36 1 883 1000

Fax number: +36 1 883 1010

Website: [www.colas.hu](http://www.colas.hu)

### **Colas Út Építőipari Zártkörűen Működő Részvénytársaság**

Registered seat: H-1113 Budapest, Bocskai út 73.

Mailing address: H-1113 Budapest, Bocskai út 73.

E-mail address: [ut@colas.hu](mailto:ut@colas.hu)

Telephone number: +36 1 883 1000

Fax number: +36 1 883 1010

Website: [www.colas.hu](http://www.colas.hu)

### **Debreceni Magas, Mély és Útépítő Zártkörűen Működő Részvénytársaság**

Registered seat: H-1113 Budapest, Bocskai út 73.

Mailing address: H-1113 Budapest, Bocskai út 73.

Telephone number: +36 1 883 1000

Fax number: +36 1 883 1010

Website: [www.colas.hu](http://www.colas.hu)

### **EGÚT Egri Útépítő Zártkörűen Működő Részvénytársaság**

Registered seat: H-1113 Budapest, Bocskai út 73.

Mailing address: H-1113 Budapest, Bocskai út 73.

Telephone number: +36 1 883 1000

Fax number: +36 1 883 1010

Website: [www.colas.hu](http://www.colas.hu)

The Data Controllers are hereinafter collectively referred to as: **“Hungarian Colas Group”/ „Data Controller”**.

## **SECTION I**

### **2. PURPOSE OF THE INFORMATION NOTICE**

With regard to data processing activities conducted by the Hungarian Colas Group, the conformity of this Information Notice with other internal policies must be ensured for the sake of protecting natural persons' fundamental rights and freedoms. Furthermore, the processing of personal data must be in line with the relevant legal framework.

The purpose of this Information Notice is to provide

- parties entering into contracts with the Data Controller (private individuals, entrepreneurs, natural person partners, clients);
- contact persons specified in contracts signed with the Data Controller;
- employees of contracted partners working at the sites of the Data Controller;
- persons taking part in visits to job sites and mining sites

(hereinafter collectively referred to as: **“Data Subject”**) with adequately detailed, accurate and transparent information through the [www.colas.hu](http://www.colas.hu) website on the personal data collected by the Data

Controller, the purpose and context of data collection, data use and data processing, as well as the rights of the Data Subject regarding the data processing.

### **3. LAWS SERVING AS THE BASIS OF DATA PROCESSING**

Laws applicable to data processing activities as per this Information Notice are particularly the following:

- 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 (hereinafter referred to as: “**General Data Protection Regulation**”/ “**GDPR**”)
- Act CXII of 2011 (Hungary) on the Right of Informational Self-Determination and on Freedom of Information

### **4. DEFINITIONS**

**Personal data** means any information relating to an identified or identifiable natural person (*data subject*); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The definitions of further terms used in this Information Notice are included in Article 4 of the General Data Protection Regulation.

### **5. SCOPE OF THE INFORMATION NOTICE**

Section II of this Information Notice specifies the personal data of contracting parties (private individuals, entrepreneurs, natural person partners, clients) and of their employees processed by the Hungarian Colas Group as Data Controller, as well as the purpose of data processing, the legal basis for the processing and the duration of the processing.

### **6. GENERAL PRINCIPLES APPLICABLE TO DATA PROCESSING**

Data processing activities specified in this Information Notice are conducted by the Hungarian Colas Group in accordance with the following principles, including the definition of measures required for the application of those principles in order to ensure that personal data are:

- a) processed lawfully, fairly and on an adequate legal basis (lawfulness, fairness and transparency),
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes,
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation),
- d) accurate and, where necessary, kept up to date; if possible, inaccurate personal data must be erased or rectified without delay (accuracy),

- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for statistical purposes with appropriate technical and organisational measures in place (storage limitation),
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised processing, accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality),
- g) processed in a way that enables the controller to be responsible for compliance with the above principles, and be able to demonstrate compliance.

The Hungarian Colas Group does not use automated decision-making and profiling in connection with Data Subjects.

## **7. ACCESS TO PERSONAL DATA, TRANSFER OF PERSONAL DATA, ENGAGING A DATA PROCESSOR**

### **7.1 Access to data and the transfer of data**

Based on the relevant authorisations, the employees of the Hungarian Colas Group have access to personal data provided by the Data Subject to facilitate the fulfilment of their tasks.

7.2. If required, the personal data of Data Subjects are transferred in line with the relevant legal regulations and in a retraceable manner.

## **8. DATA SECURITY MEASURES**

The Data Controller undertakes the obligation of ensuring the safety of data. Furthermore, the Data Controller shall take technical and organisational measures and adopt operational rules that guarantee the protection of recorded, stored and processed data. The Data Controller shall prevent the destruction, unauthorised use and unauthorised alteration of the data.

The Data Controller shall prevent unauthorised persons from accessing, disclosing, transferring, altering or erasing the data. The processed data may only be accessed by the Data Controller, its employees, and the Data Processor engaged by the Data Controller. The Data Controller shall not hand over any data to third persons lacking authorisation to access the data.

**The Data Controller shall make all efforts to prevent any intentional or accidental damage to the data or destruction of the data. The Data Controller shall require its employees participating in data processing activities to comply with the above obligations.**

## **9. MANAGEMENT AND NOTIFICATION OF PERSONAL DATA BREACHES**

Personal data breach means any event leading to the unlawful processing or controlling – particularly accidental or unlawful access, alteration, disclosure, destruction, loss or damage – of the data processed, transferred or stored by the Data Controller.

The Data Controller shall report the personal data breach to the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter referred to as: NAIH) without undue delay, not later than 72 hours after having become aware of it, unless the Data Controller is able to demonstrate that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where such notifications cannot be achieved within 72 hours, the reasons for the delay should accompany the notification and information may be provided in phases without undue further delay. The notification sent to NAIH shall at least include the following information:

- nature of the personal data breach, including the categories and number of data subjects concerned and the categories and number of personal data records concerned
- name and contact information of the data controller;
- the likely consequences of the personal data breach;
- measures taken or proposed to be taken to address and mitigate the personal data breach.

When the personal data breach is likely to result in a high risk, the Data Controller shall communicate the personal data breach to the data subjects through the website not later than 72 hours after having become aware of it. Such communication shall at least include the information specified in this clause.

In order to ensure the monitoring of the related measures and the information of the data subjects concerned, the Data Controller shall maintain a record of personal data breaches. The record shall include the following pieces of information:

- the scope of personal data concerned;
- the scope and number of data subjects concerned;
- date of the personal data breach;
- context and effects of the personal data breach;
- measures taken to mitigate the personal data breach.

Information included in the records shall be retained by the Data Controller for 5 years from becoming aware of the personal data breach.

## **10. RIGHTS OF THE DATA SUBJECT CONCERNING DATA PROCESSING**

### **10.1. The right to be informed**

Through the contact information specified in Clause 1 hereabove, the data subject has the right to request information from the Data Controller in writing on

- the personal data processed,
- the legal basis of data processing,
- the purposes of the processing,
- the sources of personal data,
- the duration of data processing,
- who were provided access to personal data, which pieces of personal data were they provided access to, the time and legal basis of access, as well as the recipients of any data transferred.

Through the contact information provided by the data subject, the Hungarian Colas Group will reply to information requests within the shortest time possible, but within a maximum of 1 month.

#### **10.2. Right to rectification**

Through the contact information specified in Clause 1 hereabove, data subjects have the right to request the Hungarian Colas Group to alter their personal information (for example: altering their e-mail addresses at any time). The Hungarian Colas Group will fulfil rectification requests within the shortest time possible, but within a maximum of 1 month, subsequently notifying the data subjects through the contact information provided by them.

#### **10.3. Right to erasure**

Through the contact information specified in Clause 1 hereabove, data subjects have the right to request the erasure of their personal data processed by the Hungarian Colas Group. Such requests may be submitted in writing at any time.

Please note that the Hungarian Colas Group may not be able to erase personal data due to obligations existing pursuant to relevant law. In such cases, the request for erasure will be rejected pursuant to the legal regulations in effect. In case there is no legal obstacle to erasing the personal data, the Hungarian Colas Group shall approve the request for erasure, and your personal data will be permanently erased within 30 days from receiving the request, on which you will receive a notice.

#### **10.4. Right to restriction of processing**

Through the contact information specified in Clause 1 hereabove, data subjects have the right to request the restriction of processing from the Hungarian Colas Group in writing. The restriction shall be maintained until the specified reasons make that necessary.

For instance, data subjects might request the restriction of processing if – in their opinion – the processing was unlawful, but the personal data should be retained for purposes of the authority proceedings or judicial proceedings initiated by the given data subject. In this case, the Hungarian Colas Group shall store the personal data (and/or the documents containing the personal data) until the inquiry by the given authority or court, and shall subsequently erase the data.

#### **10.5. Right to object**

Through the contact information specified in Clause 1 hereabove, data subjects have the right to object to the processing of their personal data by the Data Controller in case they consider that the Hungarian Colas Group would transfer or use their personal data without prior approval for purposes other than defined in this Information Notice. For instance, data subjects may object to processing if the Hungarian Colas Group would use their personal data for direct marketing purposes without their prior approval. Data Subjects may object to processing even if the data processing is required for enforcing the legitimate interests of the Hungarian Colas Group, with the exception of data processing based on authorisations prescribed by law.

## **11. ENFORCEMENT OF RIGHTS PERTAINING TO DATA PROCESSING**

### **11.1. Complaints submitted to the data protection officer**

In case you wish to submit a complaint in connection with the processing of your personal data, please contact the data protection officer of the Hungarian Colas Group:

Dr. Margit RÉVÉSZ - HR & communication director

E-mail address: [adatvedelem@colas.hu](mailto:adatvedelem@colas.hu)

Telephone number: +36 1 883 10 00

Mailing address: H-1113 Budapest, Bocskai út 73.

### **11.2. Initiation of judicial proceedings**

In case data subjects consider that their rights were infringed in connection with the processing of their personal data, they are entitled to initiate civil proceedings against the Hungarian Colas Group. Regional courts have jurisdiction in such civil proceedings – therefore, the proceeding can be initiated at the regional court corresponding to the data subject's permanent or temporary place of residence. The court shall handle such cases under expedited proceedings. In case the court confirms the infringement, the given data subject shall be entitled to damages and compensation, and the court may instruct the Hungarian Colas Group to enable the data subject to exercise the rights in question. Information on the regional court corresponding to the data subject's permanent or temporary place of residence is available on the <https://birosag.hu/birosag-kereso> website.

### **11.3. Complaints submitted to the supervisory authority**

In case you are on the opinion that you have been subject to any wrongdoing in connection with the processing of your personal data, you may submit your complaint to the Hungarian **National Authority for Data Protection and Freedom of Information** through any of the following contacts:

E-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Telephone number: +36 1 391 1400

Mailing address: H-1363 Budapest, Pf.: 9.

Website: [www.naih.hu](http://www.naih.hu)

## SECTION II

### **PERSONAL DATA OF BUSINESS PARTNERS, PROFESSIONAL PARTNERS, CONTRACTING PARTIES AND RELATED THIRD PARTY DATA SUBJECTS PROCESSED BY THE HUNGARIAN COLAS GROUP, THE PURPOSE OF DATA PROCESSING, THE LEGAL BASIS FOR THE PROCESSING, AND THE DURATION OF THE PROCESSING**

#### **1. PROCESSING THE DATA OF CONTRACTING PARTIES (PRIVATE INDIVIDUALS, ENTREPRENEURS, NATURAL PERSON PARTNERS, CLIENTS)**

The Hungarian Colas Group processes private individuals', entrepreneurs', natural person partners', and clients' data specified in contract agreements. The purpose of this data processing is the fulfilment of contractual obligations.

**The scope of processed data:** name, place of birth, date of birth, mother's name, residential address, tax number, bank account number, telephone number, e-mail address.

**The purpose of data processing:** contracting, performance of contracts, obligation of retaining accounting documents, enforcement of claims.

**The legal basis for data processing:** Performance of contracts as per Point (b), Paragraph 1, Article 6 of the GDPR, and compliance with legal obligations as per Point (c), Paragraph 1, Article 6 of the GDPR.

**The duration of data processing:** Data are processed within the time frame of contractual relations, including the period when claims regarding the contract can be enforced. However, the period of data processing is limited to 8 years from the last communication (e.g. correspondence via mail, date of incoming or outgoing documents) pertaining to the given contract. In case of accounting documents, data are retained for a period of 8 years pursuant to Section 169 of Act C of 2000 (Hungary) on Accounting.

#### **2. DATA PROCESSING PERTAINING TO CONTACT PERSONS SPECIFIED IN CONTRACTS**

The Hungarian Colas Group processes the data of natural persons specified as contract persons by its contracted partners.

**The scope of processed data:** name; workplace; position; e-mail address; telephone number.

The aforementioned personal data are acquired by the Hungarian Colas Group directly from the contract person (natural person) or from the contracted partner of the Hungarian Colas Group.

**The purpose of data processing:** keeping contact with contracted partners, ensuring communication, and facilitating the performance of the contract.



**The legal basis for data processing:** Legitimate interests as per Point (f), Paragraph 1, Article 6 of the GDPR.

Legitimate interests of the Data Controller: smoother communication with contracted partners and facilitating the performance of contracts. In accordance with data protection regulations, the Hungarian Colas Group has carried out the assessment of the legitimate interests designated as the legal basis for processing the data in question. The assessment confirmed that the processing of contact persons' data by the Hungarian Colas Group is in the interest of both the Hungarian Colas Group and its contracted partners, considering that the lack of this data processing would render the performance of the contract, communication regarding business relations, and the performance of works impossible or unreasonably difficult. At the same time, contact persons (as Data Subjects) can reasonably expect the processing of their data, as the provision of their names and contact information is a general requirement in their positions. Data processing does not affect the Data Subjects' private life, and the Data Subjects do not have any interests, fundamental rights or freedoms that would overwrite the data processing.

**The duration of data processing:** In case of data not specified in the contract, the Hungarian Colas Group will process the data as long as necessary for performing the given contract, but for a maximum of 5 years from the expiry of the contract. In case the data constitute a part of the contract, the duration of data processing is 8 years from the expiry of the contract.

### 3. HEALTH AND SAFETY INSPECTION OF JOB SITES

The Hungarian Colas Group carries out inspections on job sites on a regular basis. For this purpose, it processes the data of persons employed on job sites.

**The scope of processed data:** name, place of birth, date of birth, position, breathalyser test results.

**The purpose of data processing:** Ensuring a work environment that is safe, free of health hazards, and complies with the stipulations of Act XCIII of 1993 (Hungary) on Occupational Health and Safety (hereinafter referred to as: OHS Act).

**The legal basis for data processing:** Compliance with legal obligations as per Point (c), Paragraph 1, Article 6 of the GDPR, compliance with Paragraph (7), Section 53 of the OHS Act.

**The duration of data processing:** Personal data provided in connection with the health and safety inspections of job sites are processed by the Hungarian Colas Group for 10 years from the handover of the given project to the client.

### 4. ENSURING THE LAWFUL EMPLOYMENT OF PERSONS WORKING ON JOB SITES

In order to ensure the lawful employment of natural persons (not employed by the Hungarian Colas Group) engaged in works on certain job sites, the Hungarian Colas Group requires contracted partners to submit the documents entitled "Alvállalkozóra vonatkozó alapadatok" ("Basic information on

subcontractors”) and “Nyilatkozat a legális foglalkoztatásról” (“Statement on lawful employment”) when signing the contract. This serves to ensure that all persons entering the job site are employed lawfully by the given contracted partner.

**The scope of processed data:** name, place of birth, date of birth.

**The purpose of data processing:** Lawful employment in compliance with Act I of 2012 (Hungary) on the Labour Code (hereinafter referred to as: Labour Code), and ensuring a work environment that is safe, free of health hazards, and complies with the stipulations of the OHS Act.

**The legal basis for data processing:** Compliance with legal obligations as per Point (c), Paragraph 1, Article 6 of the GDPR, and compliance with the OHS Act and the Labour Code.

**The duration of data processing:** Personal data collected in connection with persons performing works on job sites are processed by the Hungarian Colas Group for 10 years from the handover of the given project to the client.

## 5. HEALTH AND SAFETY TRAININGS

The Hungarian Colas Group arranges health and safety trainings for the employees of contracted partners performing works on its job sites. In relation to this, the Hungarian Colas Group processes the data of contracted partners’ employees as described below.

**The scope of processed data:** name, position, signature, name of employer (company).

**The purpose of data processing:** documentation of health and safety trainings, ensuring processes stipulated in the OHS Act.

**The legal basis for data processing:** Compliance with legal obligations as per Point (c), Paragraph 1, Article 6 of the GDPR, compliance with Paragraph (1), Section 55 of the OHS Act.

**The duration of data processing:** With regard to the documentation of health and safety trainings, the personal data of employees are processed by the Hungarian Colas Group for 10 years from the given training session.

**Transfer of data:** Data processed for the purpose of documenting health and safety trainings may be transferred by the Hungarian Colas Group to the regional labour safety authority in order to comply with legal obligations.

## 6. PHOTOGRAPHS AND VIDEO RECORDINGS TAKEN AT JOB SITES

In order to fulfil contractual obligations, document the infringement of health and safety rules on the job site (and to transfer the recordings to the contracted partners having committed the infringement),

for use as references, or for the purposes of marketing activities, the Hungarian Colas Group may take photographs and video recordings that might feature employees of its contracted partners.

**The scope of processed data:** photographs and video recordings.

**The purpose of data processing:** Verification and documentation of the progress of works as a contractual obligation; documenting that performance is in accordance with contractual requirements; compilation of documentations required for the enforcement of warranty claims, defect liability claims or other types of claims; security, documentation of the infringement of health and safety rules as a legal obligation; presentation of the recordings as references or disclosure for marketing purposes.

**The legal basis for data processing:** The consent of the data subject as per Point (a), Paragraph 1, Article 6 of the GDPR and Paragraph (1), Section 2:28 of Act V of 2013 (Hungary) on the Civil Code. The consent is acquired from the data subject by the contracted partner of the Hungarian Colas Group.

**The duration of data processing:** Personal data are processed until the purpose of data processing is achieved, and/or the withdrawal of the data subject's consent.

**Transfer of data:** Personal data related to photographs and video recordings taken on the job site are transferred by the Hungarian Colas Group to its French parent company or its relevant client. The legal basis of data transfer is the legitimate interest of Colas, regarding which the Hungarian Colas Group has carried out the corresponding assessment of the legitimate interests.

## 7. COMPENSATION CASES

In case a private individual submits a claim due to (potential or actual) injury related to performing works, the Hungarian Colas Group processes the personal data of the Data Subject as described below.

**The scope of processed data:** name, place of birth, date of birth, mother's name, number of identification card, residential address, social security number, bank account number, nature of the injury, data of the medical discharge summary, information on medication taken by the data subject.

**The purpose of data processing:** Management of compensation cases.

**The legal basis for data processing:** The legitimate interest of the Hungarian Colas Group, regarding which the corresponding assessment of the legitimate interests has been carried out.

**The duration of data processing:** In case of personal data pertaining to compensation cases, the duration of processing is 10 years from the announcement of the claim.

**Transfer of data:** Personal data pertaining to compensation cases may be transferred by the Hungarian Colas Group to its contracted insurance company. The legal basis of data transfer is a legitimate interest as per Point (f), Paragraph 1, Article 6 of the GDPR, regarding which the Data Controller has carried out the assessment of legitimate interests.

## 8. VISITS TO JOB SITES AND MINING SITES

**The scope of processed data:** name, position, date of birth, signature.

**The purpose of data processing:** Verification of the training received by visitor natural persons prior to the site visit. The personal data of employees supervising site visits and cooperating in site visits are processed in order to adequately document checks in connection with site visits.

**The legal basis for data processing:** The consent of the data subject as per Point (a), Paragraph 1, Article 6 of the GDPR.

**The duration of data processing:** Personal data in connection with site visits are processed by the Hungarian Colas Group until the withdrawal of consent, or the expiry date of claims related to mining site visits.

## 9. ACCESS CONTROL OF VISITORS

The Data Controller maintains records of visitors, guests and business partners arriving to employees at its registered seat (H-1113 Budapest, Bocskai út 73).

**The scope of processed data:** visitor's name, start and end of visit, name of the person hosting the visitor, visitor card number, visitor's signature.

**The purpose of data processing:** security, safety of people inside the building, business secrets, documentation of potential breaches of law.

**The legal basis for data processing:** A legitimate interest as per Point (f), Paragraph 1, Article 6 of the GDPR. The Data Controller has carried out the assessment of legitimate interests in order to comply with the referenced clause of the GDPR.

**The duration of data processing:** 3 calendar months from the exit of the visitor.

## 10. OPERATION OF AN ELECTRONIC SURVEILLANCE (CAMERA) SYSTEM

Please note that an electronic surveillance (camera) system is in operation at the registered seat of the Data Controller (H-1113 Budapest, Bocskai út 73). The corresponding data processing Information Notice is available at the reception desk of the building.