



## **Privacy notice on the personal data processed by the Vasas Hungarian Metalworkers' Federation about its members**

The purpose of the following information document is to provide you, as a trade union member, with all relevant information about the processing of your personal data by the Vasas Hungarian Metalworkers' Federation (hereinafter referred to as the "trade union").

### **Special data we process about you**

The processing of your data is subject to 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 (General Data Protection Regulation, hereinafter referred to as: "the GDPR") and to Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv.).

According to Article 9(1) of the GDPR, trade union membership is a special case of data, the processing of which is more limited in scope and subject to more stringent safeguards than other data processing. As the processing of members' data by a trade union is almost always linked to membership as a special category of data, we will ensure the protection of all data processed about you according to the guarantees laid down by the GDPR for the processing of special categories of data.

### **What do we manage and why?**

Out of your personal data

- a) as data related to your trade union membership we manage your name, date of birth, place of birth, mother's name at birth, address of residence or domicile, service address, the fact of your trade union membership, the name of your employer, your employee ID, the date you started working for your employer, your job title, your category of staff (blue or white collar), your status (active or inactive), your union membership card number, information about your union membership fees (amount, payment type and the fact that they are deducted by your employer), the position you hold in the union and the opinions and votes you have volunteered to express at meetings of the union's bodies and other forums run by the union, information about the training you have received from the union and any awards or other acknowledgements you have received, and, if you are a minor, the name, date of birth, place of birth, mother's maiden name and address or place of residence of your legal guardian,
- b) your e-mail address and telephone number as contact details, and
- c) as data relating to the use of services provided to you by the trade union, we process the documents, statements and other information voluntarily provided by you to the trade union in connection with the use of the services provided by the trade union (such as, in particular, representation of you in relation to your employer and legal advice) and, in the case of services subject to tax payment or administrative tax administration obligations, your tax identification number.

The purposes of the data processing are, in relation to the data processed as per point (a) above are to ensure the exercise of your rights as a trade union member and to facilitate and monitor the performance of your obligations as a trade union member, in relation to the data processed as per point (b) above, to communicate with you on trade union matters and, in relation to the data processed as per point (c) above, to provide you with the trade union services you have used.

The legal basis for the processing is

- a) to enforce the trade union's statutory obligation based on substantial public interest with regard to data registered in the register of NGOs or otherwise submitted to the court keeping the register on the basis of a statutory obligation, thus in particular the minutes of general meetings, general meetings of delegates and the register of members, and, in the case of a trade union or its organisational unit with legal personality, the identification data of the representative of the trade union or organisational unit, and the identification data of the trade union's executive officer *[Article 9(2)(g) of GDPR]*,

- b) that in the case of data relating to the operation of the trade union and contact details not covered by point (a), it is done within the framework of the legitimate activities of an NGO with trade union purposes, operating with appropriate guarantees [Article 9(2)(d) of GDPR],
- c) that in the case of data relating to the use of services provided to you by the trade union, it is done based on your explicit declaration of consent in relation to the use of the service [Article 9(2)(a) of GDPR] or, in the case of withdrawal of such consent, where it is necessary for the purposes of the submission, exercise or defence of the trade union's legal claims [Article 9(2)(f) of GDPR].

In the case of data relating to the use of services provided to you by the trade union, the trade union will examine the documents and declarations containing the data when you provide them to it, to determine whether they are necessary for the provision of the service. Documents not necessary for the provision of the service will be returned to you by the trade union without recording the data on them.

In addition to the data listed in this point, the trade union and its member organisations will process personal data about you only on the basis of your explicit consent, given after having read the separate data procession notice.

The trade union will provide some of its services through an independent data controller contracted with it, such as a lawyer or law firm, but will not transfer your personal data to it for this purpose, and you will be informed about the processing of your personal data in relation to the provision of the service by the contracted partner acting as independent data controller.

### **Who has access to your data?**

For all the data recorded, the data controller is the Vasas Hungarian Metalworkers' Federation (headquarters: 1086 Budapest, Magdolna u. 5-7., represented by: Lívia Spieglné dr. Balogh, chair, contact email: [vasasok@vasasok.hu](mailto:vasasok@vasasok.hu). contact telephone number: +36 1-323-5300, contact details of the Data Protection Officer: kovacs.aniko@vasasok.hu)

In the course of this activity, the data controller uses PC63 Számítástechnikai és Szolgáltató Betéti Társaság as data processor (headquarters: 2421 Nagyvenyim, Dózsa György u. 4/1. phone: +36 25-258-034, manager: Gábor Szaniszló, email: [info@pc63.hu](mailto:info@pc63.hu)), which, in connection with the processing of the data, carries out the following activities, without prejudice to the trade union's responsibilities as data controller: the operation of the Organizational Statistics Information System (SZIR) and the additional data processor is MAKASZ (headquarters: 1195 Budapest, Üllői út 283., phone: +36 20-669-8043, managing director: Edit Banai, Data Protection Officer: Szandra Steinle, email: [security@makasz.hu](mailto:security@makasz.hu)), which, in connection with the processing of the data - without prejudice to the responsibility of the trade union as data controller - carries out the following activities: discount card production, Szűcs Network Hungary Kft. (headquarters: 4400 Nyíregyháza, Rákóczi u. 98., represented by: János Szűcs, managing director, email: [info@plasztikgyar.hu](mailto:info@plasztikgyar.hu)), which, in connection with the processing of data - without prejudice to the responsibilities of the trade union as data controller, carries out the following activities: production of membership cards, Generali Biztosító Zrt. (headquarters: 1066 Budapest, Teréz krt. 4244., contact person: Gabriella Koncz, phone: +36 30-346-9799, email: [jogsegelv.koncz@gmail.com](mailto:jogsegelv.koncz@gmail.com)), which, in connection with the processing of the data, carries out the following activities, without prejudice to the responsibilities of the trade union as data controller: legal law related legal assistance service, and SIGNAL DUNA Biztosító Zrt. (headquarters: 1123 Budapest, Alkotás u. 50., represented by: Dénes Csaba CEO, phone: +36 1-458-4200, email: [info@signal.hu](mailto:info@signal.hu)), which, in connection with the processing of data, carries out the following activities, without prejudice to the responsibilities of the trade union as data controller: insurance services.

The trade union will not disclose the processed data in any form to persons outside the organisation without your express prior consent, except for data registered in the register of NGOs and other data that are required by law to be submitted to the court that keeps the register. The data entered in the register of NGOs - i.e., in the case of the trade union or its organisational unit with legal personality, the name of the representative of the trade union or organisational unit, his/her mother's name at birth, the name of the senior official of the trade union and his/her mother's name at birth - are public data by law and can be accessed by anyone from the register of NGOs.

In the event that you have declared that you wish to have your trade union membership fee deducted from your wages by your employer, the trade union may give the employer the declaration containing this fact, your name, place and date of birth, your mother's name, place of your residence or domicile, your employer's name and employee identification number, and, if identified by these data, the employer will inform you of the amount of the deducted membership fee.

### **What organisational and security measures are in place to protect your data?**

Your name, the fact of your trade union membership, the name of your employer and the place where you work may be accessed by any member of the trade union employed by that employer in order to exercise membership rights, and will be provided by the trade union to the member requesting access to this information after verification of his/her identity and membership. In other respects, access to the data processed by the trade union is limited to the trade union's senior officials and its members and employees with responsibilities, and to its employees with data procession responsibilities.

The data processed by the trade union, with the exception of the opinions expressed as a member, the votes cast and the data relating to the payment and deduction of membership fees by the employer, are electronically recorded nationwide in the password-protected and encrypted Organisation Statistics Information System (SZIR), and are not made available by the trade union in other IT systems.

### **How long do we process your data?**

The trade union manages

a) the data relating to trade union membership and contact details for five years after the termination of trade union membership in the case of a former trade union officer, and for six months in the case of other former trade union members,

b) the data relating to your use of the services provided to you by the trade union until the withdrawal of your consent, but not later than five years after the service has been provided.

If, at the expiry of the above deadlines, legal proceedings are pending, whether brought by the trade union or by you or others, in which the processing of the data is still necessary for the establishment, exercise or defence of the trade union's claims, the data will be deleted upon the final conclusion of those proceedings.

### **Can you request the deletion, rectification of your data or restriction of the processing thereof?**

You may request the deletion of your trade union membership data and contact details if you consider that the processing is unlawful, that the processing is no longer necessary for the purposes for which it was carried out or that the data must be deleted pursuant to an EU or a Member State related legal obligation.

You may withdraw your consent to the processing of data relating to the use of the services provided by the trade union at any time and may also request the restriction of the use of such data: in this case, the trade union will delete these data without delay or restrict their use in accordance with your request, unless, given the nature of the service, it cannot be excluded that you may subsequently bring a claim against the trade union in connection with the service. In such a case, we will also ensure the immediate deletion of the data if you waive the right to enforce the claim in writing.

In the event of incorrect data recording or changes to your data, you can of course request the rectification of the data processed.

### **How can you access information about your personal data?**

You can ask the trade union for information about what personal data we process, for what purposes and in what way, and you can also request a copy of the personal data we process. These requests will be honoured free of charge.

Your rights of access and use - precisely to protect your data - can only be granted after prior identification. Therefore, please send your requests, declarations and complaints related to data processing to the trade union by e-mail to tag@vasasok.hu from the e-mail address registered with the trade union, or if this is not possible for any reason, please contact the trade union at the above e-mail address or at +36 1-323-5300. In the latter case, you will need proof of identity to exercise your rights.

You may also file a complaint about the unlawful processing of your personal data or the infringement of your rights related to informational self-determination with the Metropolitan Court of Budapest (1055 Budapest, Markó u. 27., Postal address: 1363 Bp., Pf. 16.) or the competent court of your place of residence, or with the National Authority for Data Protection and Freedom of Information (1135 Budapest, Szilágyi Erzsébet fasor 22c, www.naih.hu).