

**BORSODCHEM ZRT.'S PRIVACY NOTICE  
FOR REPRESENTATIVES OF OUR BUSINESS PARTNERS AND OTHER EXTERNAL PARTIES**

**Dear Partner,**

The lawful processing of data of all partners, respectively personal data of natural persons representing our partners is of high priority for BorsodChem Zrt. The purpose of this document is to provide you with information on details of processing of your personal data at BorsodChem Zrt.

If you are the legal or official representative of a legal entity entering into contractual relationship with BorsodChem Zrt., please ensure that all employees of the legal entity represented by you, who enter into any relationship with our company based on the relevant contract are duly informed about the content of the current privacy notice. If the legal entity, which you represent involves subcontractors or any other contributors into the fulfilment of the relevant contract, inform your subcontractor about the availability of this privacy notice.

In our Company, the processing of personal data is governed by European Parliament and Council Regulation 2016/679 ("General Data Protection Regulation", "GDPR"), on "the protection of natural persons regarding the processing of personal data and on the free movement of such data", as well as according to Act CXII of 2011 of Hungary on "Information autonomy and freedom of information".

**The data controller and its contact information**

BorsodChem Zrt

Address: 3700 Kazincbarcika, Bolyai tér 1.

Telephone: +36-48-511-211

Fax: +36-48-511-511

E-mail: bc@borsodchem.eu

infosec@borsodchem.eu (in data protection and data processing issues)

**The purpose of data processing**

BorsodChem Zrt. can process your personal data for several purposes, depending on what kind of relationship you or the legal entity represented by you establish with our company. The purpose of processing of your personal data can be as follows:

- a) Planning and setting up a business relationship, in the form such as communication, business meeting, or questionnaire survey.
- b) Accepting or submitting quotations, business offers, signing a contract.
- c) Taking steps for the fulfilment of the contracts, executing and documenting workflows and financial processes, such as transaction of ordering, delivering and receiving products and services, providing product support services, issuing Performance Certificates and arranging financial obligations.
- d) Evaluating and developing a business relationship, for example, as a customer or supplier satisfaction survey.
- e) Organization and arrangement of entry into the premises of BorsodChem Zrt, for example in the form of preparation of an entry card.
- f) Establishing safe conditions for staying and working in the territory of our company from the point of view of property-, labour- and health protection. For example, providing safety training, familiarizing you with our applicable regulations, checking your qualifications for your work, checking your health fitness for work, recording phone calls made towards our dispatcher centre.
- g) Maintaining and controlling safe conditions and circumstances for working and staying in the territory of our company in terms of property-, labour- and health protection. In addition, investigation and penalizing breaching our related safety, ethics and other regulations, by chance violations of rules of

law. For example, in form of on-site inspection of work, the operation of a camera system, measurement of the speed of vehicles, breath test of alcohol, drawing protocols and occasional audits.

- h) Recruitment, selection of potential workforce, for example in the form of processing of CVs, motivational letters received for job advertisements, executing job interviews and related tests.
- i) Provision of training and internship opportunities for third parties.
- j) Organizing, conducting, documenting special events, for example in the form of partner meetings, press conferences, competitions, applications, and related photos, records.
- k) Operation of our own whistleblowing (ethics) line, communicating with the notifying persons and investigating the notifications. Conducting occasional internal investigations.
- l) Compliance with legal obligations and official data services.
- m) Management and settlement of disputes, litigations.

### **The legal basis for data processing**

To achieve the above data processing purposes, it is necessary to perform processing of personal data. In particular, the fulfilment of the agreements with our business partners and the creation and maintenance of safe conditions of work in our territory cannot be achieved without processing personal data.

The legal bases for the processing of personal data are primarily Articles 6 (1) (c) or (f) of the General Data Protection Regulation (fulfilment of a legal obligation or legitimate interest). For the typical related data processing purposes see above: b.), c.), e.), f.) g.) k.), l.), m.).

In some cases, personal data is processed based on Article 6 (1) (a) of the General Data Protection Regulation (consent). For the typical related data processing purposes see above: d.), h.), j.).

In some cases, the legal basis for data processing is Article 6 (1) (b) of the General Data Protection Regulation (processing is necessary for the performance of a contract). For the typical related data processing purposes see above: i.).

### **The scope of processed data**

In order to achieve the above-described data processing purposes, BorsodChem Zrt. typically, may process the following personal data:

- Contact details such as name, position, telephone number (line and mobile), email address, fax and postal address.
- Data and information resulting from business or other cooperation such as signatures, business needs, standpoint, business transaction data, unique identifiers (e.g. chambers identification number.).
- Data required for the fulfilment of contracts, settlements, and issuance of Performance Certificates, such as identification data concerning the employees of contracted partners and their subcontractors, qualifications and education information, as well as data on entries and exits to our company's premises.
- Financial data required to carry out financial transactions, such as: tax identification number (for private persons), bank account number.
- Data required to create an entry card, for personal identity verification, such as name, birth date, nationality, country of residence, employer, personal identity document number, mother's name, address, photo. The scope of processed data depends on purpose of your arrival and length of your stay.
- Information required for the supervision and coordination of lawful and safe work, such as information regarding the prescribed safety training and exams, the validity of medical fitness certificate, professional licences, documents evidencing professional qualifications, date and time data of your entry and exit of our company, the camera records, result of breath and blood alcohol test and the telephone calls received by the dispatcher's centre.
- Data related to the investigation of various casual events (e.g. accident, violation of our regulations) if you or any of the legal entities you represent may be involved in such events.

- Data of Curriculum Vitae, motivational letters, job interviews and related tests.
- Certificates, documents supporting school education and professional qualifications.
- Photographs and video-records made at our events, the competitive design and art works submitted for competitions and applications.
- Publicly available business information, such as free information available in company information and media sources.

### **Receivers of Personal Data**

Your personal data is primarily processed by BorsodChem Zrt. and its authorized employees. Due to legal obligations - occasionally - your personal data may be disclosed to the authorities.

Depending on the contract, the entry and exit data of the employees of the respective contractual partner and its subcontractors may be transmitted to certain contractual partners on the basis of a data transfer agreement. If you decide to take the possibility of a blood alcohol test following the breath alcohol test executed by our employees, we will involve Medi-Prevent Kft. (3700 Kazincbarcika, Akácfa u. 43., company registry number 05-09-004276) into the execution of the blood test and the management of the related sensitive data. See also transferring data to a third country.

### **Transferring data to a third country**

BorsodChem Zrt will transfer the following personal data to the third country (China) outside the Member States of the European Union, to its owner, for Wanhua Chemical Group, Ltd.:

- the data of the business representatives specified in the contracts signed with our Company,

The transfer of the data is done in compliance with the general data protection clause of Article 46 (2) (c) of the General Data Protection Regulation.

The Company provides the protection of your personal information with network, infrastructure and application-level protection (such as firewalls, antivirus programs, storage encryption mechanisms) and other process solutions (policies, authorization systems) and physical protection (e.g. lockable rooms).

### **Data retention time**

Unless explicitly stated otherwise at the time of the acquisition or recording of personal data (e.g. within a consent you have accepted), personal data will only be processed until the data processing purpose for which we have obtained and processed the data is fulfilled.

In some cases, data processing is subject to legal obligations (e.g. labour, tax, social insurance and accounting rules of law). In such cases, the processing of personal data takes place within the deadline set by rules of law.

In addition, in case of any disputes, litigation, where personal data is required as evidence, the personal data involved in the case will be processed until the disputes are closed.

### **Your (as concerned person) rights**

You, as a natural person involved in the processing of personal data, have several rights relating to the processing of your personal data, based on the provisions of the General Data Protection Regulation and the Information Act. Your data protection rights, remedies and limitations are detailed in the Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the General Data Protection Regulation. The current Privacy Notice provides you with brief information about your rights.

**Right to information**

If the Company processes personal data about you, the Company is obliged to provide you with information among others about the most important features, conditions, your data processing rights and remedies. This Privacy Notice is specifically intended to enforce your right to information.

**Right to access**

You are entitled to receive feedback from the Company as to whether your personal data is being processed and, if such processing is in progress, you have right to access to personal data and data processing information, unless otherwise provided by law does not makes it possible. At your request, the Company will provide you with a copy of the personal data that is the subject to data processing, for which the Company may charge a reasonable fee.

**Right to rectification**

You have the right to request that our company makes rectification of inaccurate personal data concerning you. You may also be entitled to request the completion of your incomplete personal data.

**Right to erasure**

You are entitled, at your request, to erase your personal data without undue delay and the Company is obliged to erase your personal data without undue delay, subject to certain conditions. Such a condition may be, for example, where personal data is no longer needed for the purpose for which they are processed or if you withdraw the consent of the data processing and there is no other legal basis for data processing. The above does not apply, for example, if further processing of personal data is required by rules of law.

**Right to restrict data processing**

You are entitled to restrict your data processing at your request, for example, if you dispute the accuracy of your personal data or if you believe that data processing is illegal and you are opposed to the deletion of the data and instead ask to restrict the use of them. If data processing is restricted, such personal data may only be handled with your consent except for storage, or otherwise processed in a case determined by the General Data Protection Regulation.

**The right to data portability**

You are entitled to receive personal information provided by you to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the Company. You can basically exercise this right if the legal basis for the data is the consent and when the data is processed in an automated way.

**Right to object**

You are entitled, at any time, to object on grounds relating to your particular situation, at any time to the processing of personal data concerning to you, arising from the legitimate interest of the Company. In this case, the Company may not process the personal data unless the Company demonstrates that the processing of data is justified by legitimate reasons of enforceability that prevail over your interests, rights and freedoms, or for the purpose of submitting, enforcing, or protecting legal claims related.

**Withdrawal of consent**

In the event that your personal data is processed based on your consent, you may at any time have the right to withdraw your consent to the processing of personal data. Upon withdrawal of the consent, our Company shall discontinue the processing of the personal data concerned. Until the moment when consent was withdrawn, the data concerned was lawfully processed. Withdrawal of consent to data processing may result in that our Company being unable to accomplish the purpose of data processing for which your personal data have been processed with your consent.

**Automated decision making and profiling**

At BorsodChem Zrt. during the processing of personal data, there is no automated decision making or profiling.

**Right to lodge a complaint**

You can get information on how is processed your personal data via the following contacts:

BorsodChem Zrt., Information security announcement line: infosec@borsodchem.eu  
+36-30-785-6117  
3700 Kazincbarcika, Bolyai tér 1., please  
indicate on the envelope: Data Protection  
and Data Security

You have the right to turn to a Court or file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) in case of any violation of your rights related to the processing of personal data. Contact details of the Authority: Address: 1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, Pf.: 9., telephone: +36 (1) 391-1400, E-mail address: ugyfelszolgalat@naih.hu.

Effective from 04 December 2025

BorsodChem Zrt.