

## **FORMER EMPLOYEES DATA PROTECTION NOTICE**

Date (effective from) 15<sup>th</sup> October 2021

The protection of your personal data is important to the BNP Paribas Group, which has adopted strong principles in that respect for the entire Group. Concerning its former employees, BNP Paribas ensures compliance with the principle of data processing transparency by setting out the obligations of BNP Paribas and the rights of data subjects regarding the processing of personal data in this Data Protection Notice. If you would like to know more about data protection within the BNP Paribas Group with regard to your personal data, please contact us at the address given under section 8 below.

This Data Protection Notice provides you with detailed information relating to the protection of your personal data by BNP Paribas S.A and/or BNP Paribas, Hungary Branch the latter with seat and registered office at 1062 Budapest, Teréz krt.55-57., registered with the Company Register under Company registration No. 01-17-000437, and/or BNP Paribas Securities Services SA and/or BNP Paribas Securities Services Hungary Branch as employer ('we', 'our', 'us'), the latter with seat and registered office at 1062 Budapest, Teréz krt.55-57., registered with the Company Register under Company registration No. 01-17-000505, as employer ('we', 'our', 'us').

The Data Protection Officer within the BNP Paribas Group is:  
Dr. Csenge Bujdosó  
Email address: [HU.CIB.GDPR@bnpparibas.com](mailto:HU.CIB.GDPR@bnpparibas.com)

This Data Protection Notice is intended for our former employees. For the purposes of this notice 'former employee' shall mean an individual who was, but has ceased to be, our employee, regardless of the type of employment (e.g. open-ended contract or fixed term contract, etc.) and regardless of the grounds for termination of the employment.

We are responsible, as a controller, for the processing of your personal data in relation to our activities. The purpose of this Data Protection Notice is to explain which personal data we process about you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

For other information, please contact to our Data Protection Officer.

### **WHICH PERSONAL DATA DO WE STORE ABOUT YOU?**

Upon termination of your employment with us we will have ceased collecting or processing any new personal data about you. Thus, our data bases and archives may contain only personal data about you that we have already collected during the course of your employment.

After the termination of your employment with us we may retain your personal data about you - in your capacity as former employee - only where this is required under labour, social security and tax law, as well as other applicable laws as the case might be, or where we have prevailing legitimate interest.

In particular we may retain the following types of personal information about you:

- **identification information** (e.g. name, ID card, and passport numbers, nationality, place and date of birth, gender, social insurance number, full name of mother, UID);
- **contact information** (e.g. postal address and e-mail address, phone number);
- **family situation** (e.g. marital status, number of children, family members);
- **tax and debt status** (e.g. tax ID, tax status);
- **education and employment information** (e.g. level of education, CV's, office location, annual appraisal, remuneration);
- **banking data** (e.g. bank account details);
- **work permit, immigration and residence status;**
- **data relating to your interactions with us** (e-mails, interview, notes & feedback);
- **professional travels data, professional expenses;**

- **employment information and records** (e.g. contractual terms and conditions of employment, subsequent amendments, employee status and remuneration, title and functional description, working time, etc.);
- **health data** (child ill, pregnancy, handicapped, sick leave);
- **criminal record** (if obtained)
- **trade union membership** (statutory leave for union activity and/or participation in union meetings and other events);
- **employment termination details.**

More detailed information on our approach to data retention, including retention periods for different categories of personal data, may be found in the BNPP Retention Policy. If you need further details about this please contact our Data Protection Officer.

## 1. WHY DO WE RETAIN YOUR PERSONAL DATA?

### a. To comply with our statutory legal and regulatory obligations

We retain your personal data for the purposes of ensuring our compliance as your former employer with the statutory requirements in the area of labour law, social law and tax law, as well as other applicable laws as the case might be.

### b. To respond to your requests

We use your personal data for the purposes of responding to your requests as your former employer, including:

- provide references with respect to your future employment;
- issuance of certificates (e.g. certificates for paid remuneration, certificates for length of service);
- responding to inquiries you may have with respect to your former employment at BNPP;

### c. To fulfil other legitimate purposes

We may retain your personal data to the extent necessary to fulfil other legitimate purposes which we may have as your former employer, such as:

- for the purpose of legal defence as necessary – to defend our rights in any legal, administrative or court proceedings;
- for the purpose of protecting our interest in case of internal or external investigations of suspected or actual breach of law;
- for the purpose of ensuring compliance with our Group and regulatory obligations: e.g. fraud prevention and prevention of terrorism, anti-money laundering rules, financial regulatory rules as well as mandatory internal or external audits, or requests from the state authorities and other competent bodies.

## 2. ON WHICH BASIS DO WE RETAIN YOUR PERSONAL DATA?

We will retain your personal data on the following legal grounds:

- 1.1. to fulfill our (legal) obligations under Hungarian labour, social security and tax law, as well as other applicable laws as the case might be, according to Article 6 paragraph 1), letter c) of GDPR; and/or
- 1.2. to pursue our legitimate interests according to Article 6 paragraph 1) letter f) of the GDPR, respectively:
  - to protect our interest and rights in event of investigated, suspected or actual violations of law;
  - to protect our interest and right in the event of audits and inspections, as well as any other form of control by competent authorities;
  - to protect our interest in the event of any litigation that may arise in respect of our interactions with you or in respect of your arrangements with us.
- 1.3. your consent where we have requested such for specific processing of personal data

### 3. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In order to fulfil the aforementioned purposes only if it is necessary, we disclose your personal data to:

- BNP Paribas Group entities for the purposes of the legitimate interests pursued by BNP Paribas Group;
- External Service providers which perform services on our behalf;
- Financial or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law;
- Certain regulated professionals such as lawyers, notaries or auditors, insolvency administrators in case of private bankruptcy;
- Garnishes in case of wage garnishments;
- Professional associations and pension schemes;
- Workers' council, shop steward;
- Health insurance companies/funds;
- Police and Governmental Authorities
- Tribunals

### 4. ARE TRANSFERS OF PERSONAL DATA OUTSIDE THE COUNTRY WHERE YOU WORKED OR OUTSIDE THE EEA ALLOWED?

In case of international transfers to a country for which the competent Authority has recognised that it provides an adequate level of data protection, your personal data will be transferred on this basis.

For transfers to a country where the level of personal data protection has not been recognised as adequate by the competent authority, we will implement one of the following safeguards to ensure the protection of your personal data:

- Binding corporate rules (BCR) if applicable within the Group.
- Standard contractual clauses approved by the European Commission for external providers.

To obtain a copy of these safeguards or details on where they are available you can send a written request as set out in Section 9.

### 5. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain your personal information on our systems for the longest of the following periods:

- any retention period that is required by law;
- as long as is necessary for the relevant activity or as long as is set out in any relevant agreement you enter into with us;
- the length of time it is reasonable to keep records to demonstrate compliance with our regulatory or legal obligations; or
- the end of the period in which litigation or investigations might arise in respect of our interactions with you or in respect of your arrangements with us.

The retention period could be shorter or longer when required by legal obligations or with respect to the purpose of the process concerned. In particular, the information listed below shall be retained for the following periods:

- employment contract, orders for change of the position, termination documents, issued certificates by the employer (i.e. for length of service, insurance period, insurance income) – without time limitation;
- payroll documents, other documents which may establish social security benefits and income, pay slips and other documents evidencing the accrual and payment of remuneration important from social security law perspective – without time limitation;
- personal training file and documents relating to employees career management and performance – up to 3 years;

More detailed information on our approach to data retention, including retention periods for different categories of personal data, may be found in the BNPP Retention Policy (to which we will provide separate access data) or if you contact our DPO at [HU.CIB.GDPR@bnpparibas.com](mailto:HU.CIB.GDPR@bnpparibas.com).

### 6. TECHNICAL AND ORGANIZATIONAL MEASURES

We have ensured that appropriate technical and organizational security measures are taken with respect to the retention and processing of personal data, including secure servers, firewalls, and encryption of personal data.

## 7. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with applicable regulations, you have the following rights:

- To **access**: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To **rectify**: where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To **erase**: you can require the deletion of your personal data, to the extent permitted by law.
- To **restrict**: you can request the restriction of the processing of your personal data, within the frames of the law
- To **withdraw your consent**: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- To **data portability**: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.
- To **not to be subject to a decision based solely on automated processing**: to the extent permitted by law, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

- Furthermore, **you have the right to object** to the processing of your personal data at any time to the extent we process your personal data for the purposes of our legitimate interests and/or of direct marketing.

If you wish to exercise the rights listed above, please send a letter or e-mail to the following address:

BNP Paribas, Hungary Branch  
1062 Budapest, Teréz krt. 55-57.  
email: hu.hr.info.gdpr@bnpparibas.com

To support your data access request to your personal data please refer to your unique Identification Number for Former Employees in your request.

Regarding your right to lodge a complaint with the competent supervisory authority we inform you that the competent supervisory authority in Hungary and its availabilities are the following:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság (in English: Hungarian National Authority for Data Protection and Freedom of Information)  
Address: 1055 Budapest, Falk Miksa utca 9-11.  
Postal address: 1361 Budapest, Pf.: 9.;  
Tel. No.: +36 (1) 391-1400;  
Fax: +36 (1) 391-1410;  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu);  
URL: <http://naih.hu>

## 8. HOW CAN YOU KEEP UP WITH CHANGES TO THIS DATA PROTECTION NOTICE?

In a world of constant regulatory and technological changes, we may need to regularly update this Former Employee Data Protection Notice.

We invite you to review the latest version of this Notice online and we will inform you of any material changes through our website or through our other usual communication channels.

## 9. HOW TO CONTACT US?

If you have any questions relating to our use of your personal data under this Former Employee Data Protection Notice or any complaint regarding the way we process your data, please contact your Data Protection Officer at [HU.CIB.GDPR@bnpparibas.com](mailto:HU.CIB.GDPR@bnpparibas.com), who will investigate your query.

If you wish to learn more about cookies and Security, please read our cookies policy link to be added: [https://cib.bnpparibas.com/about/cookies-policy\\_a-38-47.html](https://cib.bnpparibas.com/about/cookies-policy_a-38-47.html)