



PLAZMAPONT

DATA PROCESSING NOTICE

Data processing for donor plasmapheresis

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I. Introduction

This notice relates to the data processing activities of Plazmaszolgálat Korlátolt Felelősségű Társaság (registered office: 2045 Törökbálint, Torbágy utca 15/A, company registration number: 13-09-121293, tax number: 14380817-2-13) regarding data processing arising in the course of its activities related to donor plasmapheresis. This information notice therefore describes only those processes that involve data processing in connection with donor plasmapheresis.

The description in the introduction provides a comprehensive overview of the processes related to donor plasmapheresis; these processes are further detailed in each chapter.

The conduct of Plazmaszolgálat Kft.'s core business necessarily involves the processing of personal data of donors and prospective donors, as well as data falling within the special categories of personal data.

Individuals have various options for booking an appointment for a suitability assessment, and it is also possible to visit plasma centres for this purpose without a booking. Following an appointment, or without one, if they attend the plasma centre in person, factors are assessed which, if present, would prevent them from donating plasma, and a vein examination is carried out. Personal data will be processed to the extent necessary to identify the person present; furthermore, based on the results of the vein examination, a record will be made of whether the person is suitable for plasma donation, and if so, from which arm (left, right, both); if not, this fact will be recorded (NA, i.e. not suitable).

The determination of donors' suitability is carried out by doctors during the suitability examination.

If the individual in question is found to be suitable for plasma donation ('donor eligibility'), their details are recorded so that they can be identified for the purpose of plasma donation. The data is recorded and processed on the data controller's server.

Furthermore, as regulations governing pharmaceutical manufacturing and medical activities require the data subject to be identified multiple times during the processes, the data and the data subject's photograph are also recorded on a so-called "internal donor card" so that the data subject can be clearly identified prior to the various processes.

The data that must be recorded during donor plasmapheresis is partly determined by legislation. In this respect, the data controller has no discretion to determine which data is to be recorded.

A blood sample is taken during the eligibility screening, the purpose of which is to carry out tests in accordance with statutory requirements. The test is carried out both at the data controller's premises and at another company, which is thus classified as a data processor. The data constituting the test results are classified as special categories of personal data under the GDPR.

If, during the medical fitness examination or the testing of samples, the donor is excluded from plasma donation, this fact is recorded in the system and at the bottom of the questionnaire with the note "donor excluded", (in the case of temporary exclusion, the reason and fact of the exclusion may be recorded only in the system and not at the bottom of the questionnaire); if permanent exclusion occurs, this is also recorded on the "internal donor card" following prior discussion with the donor. If, based on viral serology

or due to the emergence of risk factors, and the plasma in question has already been shipped to the manufacturing company for pharmaceutical production, then the company using the plasma for medicinal product manufacturing shall be notified under a “look-back procedure” or “post-donation information procedure”.

Furthermore, a screening must be carried out before every plasma donation, consisting of a fresh medical history, a physical examination if necessary, and the determination of vital signs and haemoglobin levels. The current donor eligibility for plasma donation is determined by a doctor or paramedic. The latter applies if the assessment of eligibility is not being carried out on the occasion of the 15th plasma donation. Confirmation of current donor eligibility is valid only for the day of the examination. The results of the examination are recorded electronically in our system.

If all the conditions for plasma donation are met, the medical or healthcare professional or paramedic may authorise the plasma donation. They then print out the label sheet for plasmapheresis. The donor labels on the printed label sheet serve several purposes during the plasmapheresis process. They contain the data required for the manufacturing record, as well as the unique identifiers needed to identify the sample and the plasma unit.

Should any deviation occur during plasma collection (e.g. interruption of plasmapheresis, haematoma, clotting, donor reactions, etc.), the fact of the deviation and the nature of the deviation are also recorded on the donor label and in PC-Blut, i.e. the computer programme used by the company.

The labelling of plasma collection bottles is carried out in accordance with Article 0853 of the European Pharmacopoeia, as specified in detail in the manufacturing specifications. The labelling also includes certain personal details of the donors in order to comply with regulations relating to pharmaceutical manufacturing. The bottles are handed over to the pharmaceutical manufacturer with this labelling.

If a donor wishes to donate plasma regularly at another centre belonging to the company, i.e. wishes to transfer to another centre belonging to the company, the centre where the donor previously donated plasma regularly will send the documents for the “Donor declaration of transfer to another plasma centre” to the other centre where the donor wishes to donate plasma regularly in future. Upon receipt of the declaration, the head physician at the receiving centre will update the donor’s home centre in PC-Blut. If the donor submits the declaration at the receiving centre, this declaration must be returned to the original centre for safekeeping!

The quality and safety standards relating to the collection, testing, processing, storage and distribution of human blood and blood components, as well as certain technical requirements thereof, are set out in Section 4(2a) of Decree No. 3/2005 (II. 10.) , Plazmaszolgálat Kft. may only carry out this activity if it holds a licence issued by the National Centre for Public Health and Pharmacy (NNGYK) and has concluded a cooperation agreement with the National Blood Supply Service. Plazmaszolgálat Kft. is obliged to comply with the terms of the agreement, as fulfilment of these terms is essential for the continuation of its core business. Thus, under the agreement, Plazmaszolgálat Kft. transfers data to the National Blood Supply Service with the data subject’s consent. Such data transfer takes place in the event of the data subject’s permanent exclusion from plasma donation due to a positive viral test result, as well as in relation to plasma donations, as donors may only donate

plasma if they participate in voluntary blood donation at the National Blood Service within a specified period.

Furthermore, in the event of the occurrence of diseases or viral carriage specified under Decree 18/1998 (VI. 3.) NM on epidemiological measures necessary for the prevention of infectious diseases and epidemics, Plazmaszolgálat Kft. is obliged to report these to the National Centre for Public Health and Pharmacy.

If the collected plasma is suitable for further processing, it is transported to the pharmaceutical manufacturer following release. If, for any reason, the plasma is not suitable for further use, it must be destroyed.

To keep track of the allowances paid to donors, the allowances provided are recorded on a donor payment card, and a payment receipt and tax certificate are issued.

II. Data processing activities related to donor plasmapheresis

II.1. Data processing related to eligibility tests and tests associated with plasma donation

If the data subject is found to be suitable during the vein check, their data is recorded to enable identification for the purpose of plasma donation. The data is recorded and processed on the data controller's server. The scope of this data is defined by Decree No. 3/2005 (II.10.) of the Ministry of Health. Once the data subject has provided this information and it has been recorded in the system, the computer system generates a donor number, which aids in the identification of the data subject during subsequent processes; furthermore, a registration number is also generated, which is significant from a haemovigilance perspective. The data subject's photograph is then taken and stored in our computer system; furthermore, as regulations governing pharmaceutical manufacturing and medical activities require the data subject to be identified multiple times during the process, the data subject's photograph and personal data (mother's maiden name, photograph, identity document number, type of identity document, address, place of birth, date of birth, birth name, social security number, name used, donor number) are also recorded on this so that the data subject can be clearly identified prior to various procedures.

The data that must be recorded is partly determined by legislation. In this respect, the data controller has no discretion to determine which data is to be recorded.

The data subject's suitability assessment is then carried out to determine donor suitability, which is mandatory under the relevant legislation. During this examination, in order to assess the donors' state of health, vital signs are checked (pulse, blood pressure, body temperature), haemoglobin levels are measured, and questionnaires are completed, which include data falling within the special categories of personal data (e.g. sexual habits, illnesses, etc.), and a physical examination. The suitability of donors is assessed by doctors during the suitability examination.

Thereafter, a member of staff at reception verifies the data with the data subject using a photo ID suitable for identification. To determine current donor eligibility, a pre-donation examination is carried out, consisting of a fresh medical history, a general physical examination, and the measurement of vital signs and haemoglobin levels. To

eligibility, the 'Plasma Donation Questionnaire' form is also completed, which records data falling within the special category of personal data (e.g. sexual habits, medical conditions, etc.). The determination of donors' current eligibility is carried out by doctors or healthcare professionals.

During the eligibility assessment, a blood sample or, in the case of plasmapheresis, a plasma sample is taken from the data subject for the purpose of carrying out tests in accordance with legal requirements. The testing is carried out both at the data controller's premises and at another company, which is thus classified as a data processor. The data resulting from the tests are classified as special categories of personal data under the GDPR. Only the registration number is marked on the tubes containing the samples, thereby reducing the risk of data protection incidents.

If all the conditions for plasma donation are met, the medical or healthcare professional may authorise the plasma donation. They then authorise the printing of the label sheet for plasmapheresis. The donor labels on the printed label sheet serve several purposes during the plasmapheresis process. They contain the data required for the manufacturing record, as well as the unique identifiers necessary for identifying the sample and the plasma unit.

If, during the medical suitability assessment or sample testing, the donor is excluded from plasma donation, this fact is recorded in the system and at the bottom of the questionnaire (in the case of temporary exclusion, the reason and fact of the exclusion may be recorded only in the system and not at the bottom of the questionnaire); if a permanent exclusion occurs, this is also recorded on the 'internal donor card', and the donor is personally notified of the reason for the exclusion.

II.1.1. Name of the data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

II.1.2. Legislation governing data processing

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: GDPR).

Decree No. 3/2005 (II. 10.) of the Ministry of Health on quality and safety standards for the collection, testing, processing, storage and distribution of human blood and blood components, and on certain technical requirements thereof.

Act XLVII of 1997 on the processing and protection of health and related personal data.

Act CLIV of 1997 on healthcare.

Act CXII of 2011 on the right to self-determination in relation to information and freedom of information.

II.1.3. Purpose of data processing

The processing of data relating to the suitability assessment and pre-donation screening, the purposes of which are the identification of the data subject, the determination of their medical suitability, the completion and management of medical documentation,¹ and data processing for the purposes of pharmacovigilance.

II.1.4. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

Article 6(1)(c) of the GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject.

Article 6(1)(f) of the GDPR: the processing is necessary for the legitimate interests pursued by the controller.

Decree No. 3/2005 (II. 10.) of the Ministry of Health on quality and safety standards for the collection, testing, processing, storage and distribution of human blood and blood components, and on certain technical requirements thereof (II. 10.) EüM on quality and safety standards for the collection, testing, processing, storage and distribution of human blood and blood components, and on certain technical requirements thereof.

Sections 136–137 of Act CLIV of 1997 on Health Care (hereinafter: Health Care Act).

Section 4(3) and Sections 28–32/A of Act XLVII of 1997 on the processing and protection of health and related personal data (hereinafter: Eüak.).

II.1.5. Data processed

Donor questionnaire for the suitability assessment

Following a successful vein check, the donor completes the questionnaire (see: M 301-x/05.doc provided), which forms the basis for the suitability assessment specified in Annex 1 to Decree No. 3/2005. (II. 10.) EüM, whilst the legal framework for plasmapheresis collection is set out in Government Decree 439/2015. (XII. 28.). The legal basis for the questions in the questionnaire is defined by the eligibility criteria set out in Annex 4 of Decree No. 3/2005. (II. 10.) of the Ministry of Health.

This questionnaire must be completed even if

- the donor re-registers after 6 months,
- the donor returns after the expiry of an exclusion period exceeding 183 days
- the donor has not donated plasma within 90 days of the first eligibility assessment.

The data from the completed questionnaire is not recorded in any other system – including PC-Blut – and the certified copy is placed in the donor's file!

¹ Haemovigilance: an organised monitoring and follow-up procedure relating to serious adverse or unexpected events, or serious complications occurring in donors or recipients, as well as the epidemiological monitoring of donors.

The donor number and registration number are affixed to the questionnaire on the “Donor Eligibility Label” (see: Donor Eligibility Label data set).

What personal data is processed?

1. signature (legal requirement)
2. date of birth (legal requirement)
3. name used (legal requirement)
4. donor number (legitimate interest)
5. health/medical data (legal obligation)
6. sexually transmitted disease (legal obligation)
7. data relating to sexual relations (legal obligation)
8. data relating to the use of recreational substances (legal obligation)
9. data relating to the use of drugs (legal obligation)
10. medication dependency (statutory requirement)
11. whether the person has undergone surgery (statutory obligation)
12. data relating to pregnancy (legal obligation)
13. registration number (reg. no.) (legitimate interest)
14. Note regarding exclusion (if applicable) (legal obligation) Regular

donor questionnaire

Regular plasma donors complete a simplified questionnaire, which forms the basis for the suitability assessment specified in Annex 1 of the Ministry of Health Decree prior to the relevant plasma donation.

The data from the completed questionnaire is NOT recorded in any other system – including PC-Blut – and the certified copy is placed in the donor’s file!

What personal data is processed?

1. signature (legal requirement)
2. date of birth (legal requirement)
3. name (legal requirement)
15. donor number (legitimate interest)
4. health/medical data (legal obligation)
5. sexually transmitted disease (legal obligation)
6. data relating to sexual relations (legal obligation)
7. data relating to the use of recreational substances (legal obligation)
8. data relating to the use of drugs (legal obligation)

9. medication dependency (statutory requirement)
10. data on cosmetic surgery (statutory obligation)
11. data relating to fertility/pregnancy (legal obligation)
12. registration number (reg. no.) (legitimate interest)

Supplementary questionnaire on ear piercings, body piercings and tattoos

Following a successful vein check and prior to the first plasma donation, the donor completes the questionnaire, which forms the basis for the suitability assessment specified in Annex 1 of the Ministry of Health Decree. The data is recorded in PC-Blut; subsequently, the data is only updated if anything has changed in the meantime.

The examining doctor verifies the accuracy of the donor's statement during a personal interview; the information provided (location, motive, etc.) is taken into account using the attribute 'description of a body part suitable for identifying the data subject'.

The completed questionnaire is placed in the donor's file. As the data subject does not always remember exactly when the procedures took place, the assistant helps with the completion using the data from the previous questionnaire.

What personal data is processed?

1. signature (legal requirement)
2. date of birth (legal requirement)
3. name used (legal requirement)
4. donor number (legitimate interest)
5. Description of a body part suitable for identifying the data subject (legal

obligation) Vital signs

On every occasion (regardless of whether a suitability test or plasmapheresis is being carried out), the donor's vital signs are recorded in PC-Blut, e.g.:

- haemoglobin level (not a vital sign, but is measured)
- pulse
- blood pressure
- body temperature

The data cannot be linked to a specific individual on its own – only via the donor number (see: linking with other data sets).

What personal data is processed?

1. donor number (legal obligation)
6. health/medical data (legitimate interest)
7. registration number (legitimate interest)

Donor registration (personal data)

Registration may only take place following a successful vein check, based on the documents provided by the donor (data subject).

Chapter 10 of the SZMSZ and the Data Processing Policy forming Annex 2 set out the scope of data to be provided by the data subject.

The provision of data is voluntary; however, the scope of the data to be provided is determined by law.

Photographs of donors are taken for security reasons, based on a legitimate interest. This is done, on the one hand, to prevent abuse, and on the other hand, as a matter of vital importance, to ensure that plasma is not collected from the wrong person and that the person corresponding to the test results undergoes apheresis.

Source of the recorded data:

- document used to establish identity
- National Insurance card
- address card
- photograph taken by the assistant.

Registration requires the weight provided and verified by the data subject, as an inappropriate weight is a criterion for exclusion (less than 50 kg or more than 140 kg); however, providing a telephone number or email address is optional.

As a result of registration, a donor number is generated for the donor, which is used in all other data sets.

A centre employee can typically view the details of all donors, but can only modify the details of donors registered at that centre; this is governed by the PC Blut authorisation matrix.

Specifying the job title attribute is optional.

Prospective donors cannot donate plasma immediately after registration; this can only take place at a later date.

What personal data is processed?

1. a photograph (legitimate interest)
2. ID document number (legal obligation)
3. type of identification document (legal obligation)
4. email address or telephone number
5. address (legal obligation)
6. residence card number (legal obligation)
7. correspondence/notification address (legal requirement)
8. place of birth (legal requirement)
9. date of birth (legal requirement)

10. National Insurance number (statutory requirement)
11. name used (legal requirement)
12. donor number (legitimate interest)
13. body weight (legal requirement)

The data is recorded in writing on documents numbered 301-x/01, 301-x/02, 301-x/03, 301-x/04, 301-x/05, 301-x/07 and 301-x/15.

Donor card (internal)

An A5-sized card printed during registration and used exclusively internally by the Plasma Service, which assists staff in identifying the donor during the plasmapheresis process.

Each donor card states which member of staff prepared it, indicated by the 'employee's name' attribute.

The card is passed between the relevant staff members for each admission, and is then returned to reception by the Processing and Storage Assistant.

What personal data is processed?

1. mother's name (legitimate interest)
2. face photograph (legitimate interest)
3. ID document number (legitimate interest)
4. type of identification document (legitimate interest)
5. address (legitimate interest)
6. place of birth (legitimate interest)
7. date of birth (legitimate interest)
8. birth name (legitimate interest)
9. National Insurance number (legitimate interest)
10. name used (legitimate interest)
11. donor number (legitimate interest)
12. employee's short code (legitimate interest)
13. fact of permanent exclusion (if applicable)

(legitimate interest) Donor eligibility label

If the applicant has successfully passed the vein check, donor registration takes place. This set of data is provided to the prospective donor who attended the eligibility assessment at the previously scheduled time; this is a label printed for the event, parts of which are affixed to various data storage devices, forms and test tubes. At the specified time, the assistant registers the donor; at this point, a so-called 'registration number' is issued, which uniquely identifies the event

which is subsequently affixed next to the donor number on all data carriers and forms used during the plasmapheresis procedure.

What personal data is processed?

1. date of birth (legal requirement)
2. name (legal requirement)
3. donor number (legal requirement)
4. registration number (legal requirement)

Donor label for plasmapheresis

During the medical examination prior to plasma collection, the examining doctor prints out the donor label to be used during the subsequent plasmapheresis.

What personal data is processed?

1. registration number (legitimate interest)
2. donor number (legitimate interest)
3. donor's name (legal obligation)
4. date of birth (legal obligation)
5. time of plasma collection (legal obligation)
6. approved plasma volume (legal obligation)
7. plasma batch number (legal requirement)

Donor/suitability test results

The results of tests carried out on samples taken during the examination or following plasmapheresis, which are automatically transferred to PC-Blut by the testing instrument.

The donor screening doctor checks the test results received from the Sysmex blood analyser in PC-Blut every working day. This data set relates exclusively to test results; therefore, the data cannot be linked to a specific individual on its own – only via the donor number (see: linking to other data sets).

What personal data is processed?

1. donor number (legitimate interest)
2. health/medical data (legal obligation)
3. registration number (legitimate interest)

Information and declaration regarding excluded

donors

The senior consultant has the data subject sign a document informing them of the exclusion and advises the data subject, in their own interest, to consult their GP or the appropriate healthcare institution (e.g. the designated hospital in the case of an HIV-positive donor).

All data is extracted from PC-Blut; the recommendation document, prepared by the doctor and bearing the appropriate formalities (stamp and signature), is handed over to the data subject.

What personal data is processed?

1. National Insurance Number (legal requirement)
2. Name (legal requirement)
3. Health/medical data (legal requirement)
4. National Medical Registration Number (statutory requirement)
5. Signature (legal requirement)

II.1.6. Use of data processors

The data processors engaged by Plazmaszolgálat Kft. process data on behalf of and in accordance with the instructions of Plazmaszolgálat Kft. during the activities listed below. Data processors are only authorised to access data to the extent necessary for the performance of their tasks, provided this is strictly necessary. Data processors may not process personal data relating to donors without the permission of Plazmaszolgálat Kft., and in particular may not save or download personal data relating to data subjects. Plazmaszolgálat Kft. stores data relating to donors exclusively on its own servers located in Hungary.

Data processor engaged to perform system administration tasks relating to the company's internal server software (PC-Blut):

data processor: Biotest Hungaria Kft. registered

office: 2045 Törökbálint, Torbágy utca 15/a

company registration number: 13-09-095141

Tax number: 14380817-2-

13 Email:

biotest@biotest.hu

telephone number: +36 23511311

The software for the company's internal server (PC-Blut) is provided by:

data processor: Martin Schmidt Softwareentwicklung GmbH

registered office: D - 74538 Rosengarten, Pfarrgasse 16

Company registration

number: HRB 722167 Tax

number: DE236838913

Data processor responsible for checking the

samples: Biotest AG

Registered office: D-63303 Dreieich, Landsteinerstraße 5

Telephone number: +49 - 6103 / 801 - 0

II.1.7. Data subjects

Natural persons who wish to donate plasma and who have attended the preliminary eligibility screening and been found suitable for plasma donation, and who give their consent to the processing of their data.

II.1.8. Duration of data processing

Data processing is based on consent; therefore, in the event of withdrawal of consent, the email address and telephone number will be deleted from the system.

The data necessary for the full traceability of the collected plasma, namely the identification of the institution performing the donor plasmapheresis, the identification of the donor, the identification of the collected plasma unit, the date of the donor plasmapheresis (year, month, day), as well as the details of the facilities to which the plasma is sent after release or where it is disposed of, must be retained by the company on a readable data medium for 30 years (and it is obliged to do so). (Section 9(4) of Decree No. 3/2005 (II.9.) of the Ministry of Health).

In addition to the above, however, the Plasma Service is entitled (and obliged) to retain for 30 years on a data storage medium any other data collected on donors, in particular data relating to the donors' state of health and medical history, data collected in questionnaires, all data collected regarding the suitability of donors, and data relating to the results of tests on the collected blood plasma, including data concerning the exclusion of donors, the Plasma Service is entitled and obliged to retain for 30 years (Decree No. 3/2005 (II.9.) of the Ministry of Health, Section 24).

In accordance with the provisions of Section 30(1) of Act XLVII of 1997 on the processing and protection of health and related data

, healthcare records must be retained for at least 30 years from the date of data collection.

In the latter three cases, in accordance with the statutory provisions, data is retained in order to fulfil the statutory obligation, irrespective of the withdrawal of consent.

II.1.9. Method of data processing

Data processing is carried out manually, on paper and electronically as follows: a separate folder containing the data of the data subjects is created, which includes data for the identification of the donor (surname and first name, maiden name, gender, place and date of birth, the mother's maiden surname and first name, place of residence, current address, social security number (hereinafter: TAJ number), either collectively or individually, provided they are or may be suitable for identifying the data subject) and the internal donor card, as well as various medical records; furthermore, this data is processed and stored on the company's server using a programme called PC-Blut.

II.2. Data processing related to re-registration

If a donor wishes to donate plasma regularly at another centre belonging to the company, i.e. wishes to transfer to another centre belonging to the company, the centre where the donor previously donated plasma regularly will forward their documents to the other centre belonging to the company where the data subject wishes to donate plasma regularly in future. In order to declare their intention to transfer, the data subject must complete a transfer declaration form. To ensure that the donor is able to donate plasma at the other centre, the transfer declaration form is scanned by the previous centre where plasma was donated and sent by email to the receiving centre.

II.2.1. Name of the data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

II.2.2. Purpose of data processing

To facilitate the data subject's re-registration, during which the data subject is identified for the purpose of making a declaration, and to send their documents to the plasma centre serving as the venue for regular plasma donation.

II.2.3. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

By completing the transfer declaration, i.e. by actively expressing the transfer, the data subject, through an act that unambiguously confirms their consent, consents to the processing of their personal data in the manner, for the duration and to the extent specified in this policy.

II.2.4. Scope of data processed

1. signature (consent)
2. name (consent)
3. donor number (legitimate interest)

Furthermore, all data previously recorded and forming part of the donor documentation will be processed in order to ensure that the donor documentation is sent to the other centre. Should the data subject withdraw their consent, the transfer will no longer be possible.

II.2.5. Use of data processors

The data processors engaged by Plazmaszolgálat Kft. process data on behalf of and in accordance with the instructions of Plazmaszolgálat Kft. during the activities listed below. Data processors are only authorised to access the data to the extent necessary for the performance of their tasks, provided this is strictly necessary. Data processors may not process personal data relating to donors without the permission of Plazmaszolgálat Kft., and in particular may not save or download personal data relating to data subjects. Plazmaszolgálat Kft. stores data relating to donors exclusively on its own servers located in Hungary.

Data processor engaged to perform system administration tasks relating to the company's internal server software (PC-Blut):

data processor: Biotest Hungaria Kft. registered

office: 2045 Törökbálint, Torbágy utca 15/a

company registration number: 13-09-095141

Tax number: 14380817-2-

13 Email:

biotest@biotest.hu

telephone number: +36 23511311

The software for the company's internal server (PC-Blut) is provided by:

Data processor: Martin Schmidt Softwareentwicklung GmbH

Registered office: D - 74538 Rosengarten, Pfarrgasse 16

Company registration

number: HRB 722167 Tax

number: DE236838913

II.2.6. Data subjects

Individuals who have previously participated as donors in plasma donation or eligibility screening and wish to register with another plasma centre.

II.2.7. Duration of data processing

Until the transfer is completed, or until the intention to transfer is withdrawn.

II.2.8. Method of data processing

Data processing is carried out manually and electronically as follows: once the transfer declaration has been completed, it is retained at the plasma centre from which the donor wishes to transfer. The donor documentation is handed over in a sealed envelope. Furthermore, as explained above, the previous centre also sends the final supplementary questionnaire electronically via PC-Blut to the centre serving as the new location for plasma donation, which belongs to the company.

II. 4. Data processing related to the recording of events occurring during plasma donation and donor reactions

If any deviation is observed during plasma collection (e.g. interruption of plasmapheresis, haematoma, blood clotting, donor reactions, etc.), the fact of the deviation and the nature of the deviation are recorded on the donor label and in PC-Blut.

Any incident occurring during a plasma donation (donor reaction, interruption of plasmapheresis) must be recorded on the donor label and in PC-Blut. During donor plasmapheresis, donor reactions must be documented in accordance with medical practice, including all relevant data: subjective and objective symptoms, findings (e.g. pulse, blood pressure), therapeutic measures, the donor's condition upon discharge or handover to the ambulance crew, etc.

II.4.1. Name of data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdp@gdprtanacsadas.eu)

II.4.2. Purpose of data processing

To document all deviations observed during plasmapheresis in accordance with legal requirements.

II.4.3. Legal basis for data processing

Article 6(1)(c) of the GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject.

Article 9(2)(h) of the GDPR: data processing for the purposes of preventive healthcare or occupational health, the assessment of an employee's fitness for work, to establish a medical diagnosis, to provide healthcare or social care or treatment, or to manage health or social systems and services, in accordance with Union or Member State law or a contract with a health professional, and subject to the conditions and safeguards referred to in paragraph 3.

Decree No 3/2005 (II. 10.) of the Ministry of Health, Section 10.

II.4.4. Scope of data processed

1. Donor number
2. Deviations during plasma collection
3. Documentation of donor reactions

II.4.5. Use of data processors

The data processors engaged by Plazmaszolgálat Kft. process data on behalf of and in accordance with the instructions of Plazmaszolgálat Kft. during the activities listed below. Data processors are only authorised to access the data to the extent necessary for the performance of their tasks, provided this is strictly necessary. Data processors may not process personal data relating to donors without the permission of Plazmaszolgálat Kft., and in particular may not save or download personal data relating to data subjects. Plazmaszolgálat Kft. stores data relating to donors exclusively on its own servers located in Hungary.

Data processor engaged to perform system administration tasks related to the company's internal server software (PC-Blut):

data processor: Biotest Hungaria Kft. registered

office: 2045 Törökbálint, Torbágy utca 15/a

company registration number: 13-09-095141

Tax number: 14380817-2-13

email: biotest@biotest.hu

telephone number: +36 23511311

The software for the company's internal server (PC-Blut) is provided by:

data processor: Martin Schmidt Softwareentwicklung GmbH

registered office: D - 74538 Rosengarten, Pfarrgasse 16

Company registration

number: HRB 722167 Tax

number: DE236838913

II.4.6. Data subjects

Individuals who participate as donors in plasma donation and where an abnormality or donor reaction is observed during the donor plasmapheresis procedure.

II.4.7. Duration of data processing

The data will be retained for 30 years, as they form part of the medical records.

II.4.8. Method of data processing

Data processing is carried out manually and electronically as follows: the data provided above is recorded on a donor label and entered into PC-Blut.

II.5. Payment receipt and tax certificate

The Plasma Service issues a certificate to the data subject regarding the payments received during donations. One copy of the receipt is given to the donor, and the Plasma Service retains a copy. The certificate issued by the Plasma Service to the data subject regarding the payments received during donations is generated from the Plazmakassza programme.

II.5.1. Name of data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdp@gdprtanacsadas.eu)

II.5.2. Purpose of data processing

To provide the data subject with proof of payment and to provide information regarding payments.

II.5.3. Legal basis for data processing

Article 6(1)(c) of the GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject.

Act CXVII of 1995 on personal income tax

II.5.4. Scope of data processed

1. signature
2. mother's name
3. address
4. place of birth
5. date of birth
6. National Insurance number
7. name used
8. donor number
9. employee's name
10. Employee's signature

II.5.5. Data subjects

Those persons who participate in plasma donation as donors and have donated plasma, or who have consented to the processing of their data.

II.5.6. Duration of data processing

Data is retained for 8 years.

Section 169(1) of Act C of 2000 on Accounting.

II.5.7. Method of data processing

Receipts are issued manually, and certificates are issued via the Plazmakassza application.

II.6. Data processed by the National Blood Service

Pursuant to Section 4(2a) of Decree No. 3/2005 (II. 10.) of the Ministry of Health on quality and safety standards and certain technical requirements for the collection, testing, processing, storage and distribution of human blood and blood components, Pursuant to Section 4(2a) of the Ministry of Health Decree, Plazmaszolgálat Kft. may only carry out this activity if it holds a licence issued by the National Centre for Public Health and Pharmacy (NNGYK) and a cooperation agreement concluded with the National Blood Supply Service. Plazmaszolgálat Kft. is obliged to comply with the terms of the agreement, as fulfilment of these terms is essential for the continuation of its core business. Thus, under the agreement, Plazmaszolgálat Kft. sends data to the National Blood Supply Service with the data subject's consent. Such data transfer takes place in the event of the data subject's exclusion from plasma donation, and also includes the data of donors who have participated in plasma donations, as donors may only donate plasma if they participate in voluntary blood donation at the National Blood Supply Service within a specified period; furthermore, the National Blood Supply Service also sends data on data subjects to Plazmaszolgálat Kft. Thus, data processing with the National Blood Service takes place as follows.

During data processing, data is handled in relation to four categories of data. The first scenario involves the company sending the National Blood Service (hereinafter: OVSZ) the details of donors subject to permanent exclusion. The second scenario, in which

The company shall send the details of donors who have undergone plasmapheresis at the company (in this regard, all donors who have undergone plasmapheresis) to the National Public Health and Medical Officer Service (OVSZ) so that it is known whether the donor has undergone plasmapheresis at any other company within the past 72 hours. In the third scenario, pursuant to Section 10(1)(b) – c) of Government Decree 439/2015 (XII. 28.) on the rules governing the management of the national blood supply, industrial plasma may only be collected from a donor who, with regard to further plasmapheresis sessions following the first industrial plasma donation, donates whole blood at least once within 365 days of the date of the plasmapheresis and complies with the quality and safety requirements for the collection, testing, processing, storage and distribution of human blood and blood components, and the specific technical requirements thereof, or, as set out in Section 10(1a) of the Decree, in the case of the first industrial plasma donation following 1 April 2016, , the certificate of participation in a whole blood donation must be submitted to the healthcare provider collecting the industrial plasma within 180 days of the plasmapheresis. The healthcare provider collecting industrial plasma monitors compliance with this deadline by issuing the necessary reminder to the donor to submit the certificate. In the fourth scenario, the National Public Health and Medical Officer Service (OVSZ) sends data to Plazmaszolgálat Kft. for each case concerned, regarding the date of the last whole blood donation and the blood group. Based on the four scenarios above, Plazmaszolgálat must determine whether the data subject is eligible to donate plasma or not.

II.6.1. Name of data controller

Data controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

Data Controller: National Blood Service

Registered office: 1113 Budapest, Karolina út

19-21.

Telephone: +36 1 372 4100

Fax: +36 1 372 4189 Email:

ovsz@ovsz.hu

II.6.2. Purpose of data processing

Data is processed in order to comply with the provisions of the cooperation agreement concluded with the National Blood Service; thus, as described above, the following categories can be distinguished (in accordance with the provisions of the agreement): the transmission to the NBS of data relating to the monitoring of donors' plasma donations and data concerning donor exclusion, and the processing of data sent by the NBS regarding the fulfilment of the donor's statutory blood donation obligations.

II.6.3. Legal basis for data processing

Article 6(1)(c) of the GDPR: data processing is necessary for compliance with a legal obligation to which the controller is subject.

Section 4(3) of Act XLVII of 1997 on the processing and protection of health and related personal data.

II.6.4. Scope of data processed

1. Social Security Number (plasma donation, blood donation, monitoring of exclusion)
2. Name used (exclusion monitoring)
3. Mother's name (exclusion monitoring)
4. Date of birth (exclusion monitoring)
5. Address (exclusion monitoring)
6. Reason for and duration of exclusion (exclusion monitoring)
7. Blood group (blood donation tracking)

II.6.5. Data subjects

Those individuals who have already participated in plasma donation as donors and who give their consent to data processing.

II.6.6. Duration of data processing

30 years.

II.6.7. Method of data processing

Data processing is carried out manually and electronically as follows: the data specified above is sent to the OVSZ via email. The OVSZ also sends the data via email. Both the OVSZ and Plazmaszolgálat Kft. store the data in their own systems.

II.7. Data processing for the National Centre for Public Health and Pharmacy

In the event of the occurrence of diseases specified in Decree No. 18/1998 (VI. 3.) NM on epidemiological measures necessary for the prevention of infectious diseases and epidemics, Plazmaszolgálat Kft. is obliged to report these diseases to the National Centre for Public Health and Pharmacy (hereinafter: NNGYK).

II.7.1. Name of the data controller

Data controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

II.7.2. Purpose of data processing

The purpose of data processing is to fulfil the obligation laid down in legislation, namely to report the illness to the NNGYK in the cases prescribed by law.

II.7.3. Legal basis for data processing

Article 6(1)(c) of the GDPR: Data processing is necessary for compliance with a legal obligation to which the controller is subject.

Article 9(2)(g) of the GDPR: Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law, which is proportionate to the aim pursued, respects the essence of the right to the protection of personal data, and provides for appropriate and specific measures to safeguard the fundamental rights and interests of the data subject.

Decree No 18/1998 (VI. 3.) NM on epidemiological measures necessary for the prevention of infectious diseases and epidemics.

Act XLVII of 1997 on the processing and protection of health and related personal data (with particular regard to its provisions on data processing for public health, epidemiological and occupational health purposes).

II.7.4. Scope of data to be provided to the NNGYK

Personal identification data (to be provided only in the case of certain diseases specified in the legislation)

(Personal identification data: surname and first name, maiden name, gender, place and date of birth, mother's maiden surname and first name, place of residence, current address, social security identification number (hereinafter: TAJ number), either collectively or individually, insofar as they are or may be suitable for identifying the data subject.)

Health data: shall only be sent to the NNGYK in the event of a confirmed positive viral serology result (Hepatitis B and Hepatitis C)

(Health data: data relating to the data subject's physical, mental and psychological condition, pathological addictions, as well as the circumstances of illness or death and the cause of death, whether provided by the data subject or by another person on their behalf, or detected, examined, measured, recorded or derived by the healthcare network; as well as any data that can be linked to the foregoing and that influences them (e.g. behaviour, environment, occupation).

II.7.5. Data transfer to the NNGYK

II.7.5.1. Recipient of data transfer

Official name: National Centre for Public Health and Pharmacy Registered office:

1097 Budapest, Albert Flórián út 2-6.

Postal address: 1437 Budapest, PO Box 839.

Main telephone number: +36 1 476 1100

Email address: info@egeszsegvonat.gov.hu Website:

www.nngyk.gov.hu/

II.7.5.2. Purpose of data transfer

The performance of public health duties as specified in the legislation.

II.7.5.3. Legal basis for data transfer

Article 6(1)(c) of the GDPR: Processing is necessary for compliance with a legal obligation to which the controller is subject.

Article 9(2)(g) of the GDPR: Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law, which is proportionate to the aim pursued, respects the essence of the right to the protection of personal data, and provides for appropriate and specific measures to safeguard the fundamental rights and interests of the data subject.

Decree No 18/1998 (VI. 3.) NM on epidemiological measures necessary for the prevention of infectious diseases and epidemics.

Act XLVII of 1997 on the processing and protection of health and related personal data (with particular regard to its provisions on data processing for public health, epidemiological and occupational health purposes).

II.7.5.4. Scope of data to be transferred

Personal identification data and health data as defined by law.

II.7.5.5. Data transfer to third countries

Please be advised that no data is transferred to third countries.

II.7.6. Scope of data subjects

Those individuals in respect of whom the results of the fitness assessment reveal a condition that must be reported to the NNGYKZ in accordance with the law.

II.7.7. Duration of data processing

Until the purpose of data processing has been fulfilled.

II.7.8. Method of data processing

Data processing is carried out manually and electronically as follows: the data specified above is sent electronically to the NNGYK.

II.8. Data processing during the completion of "Post Donation Information"

If, following one or more plasma donations by the donor, an infection risk affecting the products comes to light and the plasma donated during the risk period has already been shipped to Biotest AG, a company engaged in the processing of plasma and the manufacture of medicinal products. The pharmacovigilance officer completes the 'Post-Donation Information' form and sends it to the contact details provided by Biotest AG. Exceptions are those infection risks where a 'look-back procedure' is required.

II.8.1. Name of data controller

Data controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

II.8.2. Purpose of data processing

To carry out the "Post Donation Information" procedure, the purpose of which is to enable the identification of plasma that may pose a risk to other people for the company manufacturing the medicines.

II.8.3. Legal basis for data processing

Article 6(1)(d) of the GDPR: processing is necessary for the protection of the vital interests of the data subject or of another natural person.

Section 4(3) of Act XLVII of 1997 on the processing and protection of health and related personal data.

II.8.4. Scope of data processed

1. Plasma Centre
2. Donor number
3. Reason for exclusion
4. Date of discovery
5. Start date
6. Temporary or permanent exclusion
7. Start and end dates of exclusion
8. Serial numbers and dates of purchase of plasma units

II.8.5. Data transfer

II.8.5.1. Recipient of data transfer

Biotest AG

Landesteinerstraße 5

63303 Dreieich

P.O. Box 10 20 40

D-63266 Dreieich

Telephone: +49 61 03/ 8 01 – 0

Fax: +49 61 03/ 8 01 – 1 50

Email: mail@biotest.com

Website: www.biotest.de

II.8.5.2. Purpose of data transfer

To inform the pharmaceutical manufacturer of the risk associated with the manufacture and use of plasma-derived medicinal products from a donor who has been temporarily or permanently excluded.

II.8.5.3. Legal basis for data transfer

Article 6(1)(d) of the GDPR: processing is necessary for the protection of the vital interests of the data subject or of another natural person.

II.8.5.4. Scope of data to be transferred

Plasma centre, donor number, reason for exclusion, date of discovery, start date of exclusion, temporary or permanent exclusion, start and end dates of exclusion, number of plasma units collected and date of collection.

II.8.5.5. Data transfer to third countries

Please be advised that no data is transferred to third countries.

II.8.6. Data subjects

Those individuals who participate as donors in plasma donation and who are subject to exclusion as a result of laboratory tests.

II.8.7. Duration of data processing

Reports are retained for 30 years.

II.8.8. Method of data processing

Data processing is carried out manually and electronically as follows: the data specified above is provided "Post Donation Information form" and sent to Biotest AG electronically via email.

II.9. Data processing during the "look-back procedure"

If the donor's plasma units have already been shipped to Biotest AG and the test results for HBsAg, anti-HCV, and anti-HIV 1,2 are positive/reactive or not unequivocally negative, a "Look back procedure" must be carried out.

II.9.1. Name of data controller

Data controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

II.9.2. Purpose of data processing

To carry out the 'look-back procedure', the purpose of which is to enable the identification of plasma that may pose a risk to other people for the company manufacturing the medicines.

II.9.3. Legal basis for data processing

Article 6(1)(d) of the GDPR: processing is necessary for the protection of the vital interests of the data subject or of another natural person.

Section 4(3) of Act XLVII of 1997 on the processing and protection of health and related personal data.

II.9.4. Scope of data processed

1. Plasma Centre
2. Donor number
3. Reason for exclusion
4. Date of discovery
5. Date of last negative result
6. Number of plasma units collected and date of collection

II.9.5. Data transfer

II.9.5.1. Recipient of data transfer

Biotest AG

Landesteinerstraße 5

63303 Dreieich

P.O. Box 10 20 40

D-63266 Dreieich

Telephone: +49 61 03/ 8 01 – 0

Fax: +49 61 03/ 8 01 – 1 50

Email: mail@biotest.com

Website: www.biotest.de

II.9.5.2. Purpose of data transfer

To inform the pharmaceutical manufacturer of the risk associated with the manufacture and use of plasma-derived medicinal products from a donor who has been permanently excluded.

II.9.5.3. Legal basis for data transfer

Article 6(1)(d) of the GDPR: processing is necessary for the protection of the vital interests of the data subject or of another natural person.

II.9.5.4. Scope of data to be transferred

Plasma centre, donor number, reason for exclusion, date of discovery, permanent exclusion, number of plasma units collected and date of collection.

II.9.5.5. Data transfer to third countries

Please be advised that no data is transferred to third countries.

II.9.6. Scope of data subjects

Those individuals who participate in plasma donation as donors and who are subject to exclusion as a result of laboratory test results.

II.9.7. Duration of data processing

Reports are retained for 30 years.

II.9.8. Method of data processing

Data processing is carried out manually and electronically as follows: the data specified above is "Look Back Information form" and sent to Biotest AG electronically via email.

II.10. Data processing procedures relating to the further use of collected plasma

If the collected plasma is suitable for further processing, it is transported to the pharmaceutical manufacturer following release. If, for any reason, the plasma is not suitable for further use, it must be destroyed.

II.10.1. Collected plasma (suitable for further use)

Plasma collection bottles are labelled in accordance with Article 0853 of the European Pharmacopoeia, as specified in detail in the manufacturing specifications. The label also records certain personal details of the donors in order to comply with regulations governing the manufacture of medicinal products. The vials are handed over to the pharmaceutical manufacturer with this labelling following release.

II.10.1.1. Name of the data controller

Data controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

II.10.1.2. Purpose of data processing

In order to comply with haemovigilance requirements during the pharmaceutical manufacturing process, it is necessary to label vials containing collected plasma. Furthermore, data is processed for the purposes of pharmaceutical manufacturing itself.

II.10.1.3. Legal basis for data processing

Article 6(1)(c) of the GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject.

Article 9(2)(h) of the GDPR: processing for the purposes of preventive healthcare or occupational health, assessment of the employee's fitness for work, to establish a medical diagnosis, to provide healthcare or social care or treatment, or to manage health or social systems and services, in accordance with Union or Member State law or a contract with a healthcare professional, and subject to the conditions and safeguards referred to in paragraph 3.

Section 4(3) of Act XLVII of 1997 on the processing and protection of health and related personal data.

Section 9(3) of Decree No. 3/2005 (II.9.) of the Ministry of Health: "The requirements for the labelling of blood and blood components are set out in point I of Annex 2. The manufacturer of the blood product is obliged to indicate the data on the label of the blood product in a legible and coded form, based on the verified results of the tests."

II.10.1.4. Scope of data processed

1. Donor number
2. Registration number
3. Data from plasma analysis
4. Production data

II.10.1.5. Data transfer

II.10.1.5.1. Recipient of data transfer

Biotest AG

Landesteinerstraße 5

63303 Dreieich

P.O. Box 10 20 40

D-63266 Dreieich

Telephone: +49 61 03/ 8 01 – 0

Fax: +49 61 03/ 8 01 – 1 50

Email: mail@biotest.com

Website: www.biotest.de

II.10.1.5.2. Purpose of data

transfer

For the company manufacturing the medicinal product, the dispatch of plasma is for the purpose of pharmaceutical manufacturing and to ensure haemovigilance.

II.10.1.5.3. Legal basis for data transfer

Article 6(1)(c) of the GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject.

Article 9(2)(h) of the GDPR: processing for the purposes of preventive healthcare or occupational health, assessment of the employee's fitness for work, to establish a medical diagnosis, to provide health or social care or treatment, or to manage health or social systems and services, in accordance with Union or Member State law or a contract with a health professional, and subject to the conditions and safeguards referred to in paragraph 3.

II.10.1.5.4. Scope of data to be transferred

Donor number, registration number, data from plasma analysis, production data.

II.10.1.5.5. Data transfer to third countries

Please be advised that no data is transferred to third countries.

II.10.1.6. Scope of data subjects

Those persons who participate as donors in plasma donation and have donated plasma, or who have consented to the processing of their data.

II.10.1.7. Duration of data processing

Until the purpose of data processing has been fulfilled.

II.10.1.8. Method of data processing

Data processing is carried out manually and electronically as follows: data compliant with pharmaceutical manufacturing regulations is affixed to the label on the bottle storing the plasma. The plasma itself is then transported to the pharmaceutical manufacturing company following appropriate packaging.

II.10.2. Data processing related to activities involving plasma unsuitable for further processing

If, for any reason, the plasma is unsuitable for further use, it must be discarded. A record is made of the disposal, which includes only the accession number. The destruction of the plasma is carried out by a contractual partner.

II.10.2.1. Name of data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

II.10.2.2. Purpose of data processing

The destruction of plasma unsuitable for further use, which is classified as hazardous waste.

II.10.2.3. Legal basis for data processing

Article 6(1)(c) of the GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject.

Section 4(3) of Act XLVII of 1997 on the processing and protection of health and related personal data.

Article 9(2)(h) of the GDPR: processing for preventive health or occupational health purposes, for the assessment of an employee's fitness for work, establishing a medical diagnosis, providing healthcare or social care or treatment, or managing health or social systems and services, in accordance with Union or Member State law or a contract with a healthcare professional, and subject to the conditions and safeguards referred to in paragraph (3).

Section 18(6) of Decree No 3/2005 (II.9.) of the

Ministry of Health. Act CLXXXV of 2012 on waste.

Decree No. 12/2017 (12 June) of the Ministry of Human Capacities on waste management activities relating to waste generated by healthcare providers.

II.10.2.4. Scope of data processed

1. Donor number
2. Admission number
3. Data from plasma analysis
4. Production data

II.10.2.5. Use of data processors

The data processors engaged by Plazmaszolgálat Kft. process data on behalf of and in accordance with the instructions of Plazmaszolgálat Kft. during the activities listed below. Data processors are only authorised to access data to the extent necessary for the performance of their tasks, provided this is strictly necessary. Data processors may not process personal data relating to donors without the permission of Plazmaszolgálat Kft., and in particular may not save or download personal data relating to data subjects. Plazmaszolgálat Kft. stores data relating to donors exclusively on its own servers located in Hungary.

II.10.2.6. Data subjects

Those persons who participate in plasma donation as donors and have donated plasma, or who have consented to the processing of their data.

II.10.2.7. Duration of data processing

Until the purpose of data processing has been fulfilled.

II.10.2.8. Method of data processing

Data processing is carried out manually and electronically as follows: data compliant with pharmaceutical manufacturing regulations is affixed to the label on the bottle storing the plasma. The accession number and date are recorded in the disposal report. The plasma itself is transported for destruction following appropriate packaging.

II.10. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include in its data protection policy safeguards that guarantee the protection of data subjects' rights.

The Company undertakes to prepare employee information documents relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

III. Data processing related to booking appointments

No registration is required on the website to book an online appointment for an aptitude test. It is possible to apply for the aptitude test on the dedicated interface by providing the necessary details without registration. We would like to inform applicants for the fitness test that, in accordance with the relevant legislation, only persons aged 18 or over may apply for the fitness test; furthermore, persons over the age of 60 may not take part in the fitness test, in accordance with the legislation. Those wishing to apply for a fitness test can book an appointment via a dedicated interface designed for this purpose. From the 8th day following the fitness test, the individual concerned can book an online appointment for plasmapheresis via the centre's website, which will be transferred to PC-Blut.

Appointments made by telephone are recorded in the online calendar (see online booking above), except in the case of apheresis, where they are recorded in the electronic log maintained in PC-Blut. The receptionist or call centre staff member records the booking based on the details provided by the data subject.

III.1.1. Purpose of data processing

To facilitate and enable the booking of appointments for suitability assessments and pheresis, for which a dedicated interface is available. The purpose of data processing is to record the data of applicants for suitability assessments and pheresis in order to identify the data subjects and to enable contact to be made with them.

III.1.2. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

III.1.3. The data processed and the purpose of data processing

1. name used (in the case of an aptitude test)
2. telephone number (for aptitude tests)
3. Year of birth (for aptitude tests)
4. telephone number (in the case of a suitability assessment)
5. consent to direct marketing (in the case of a suitability assessment)
6. donor number (in the case of apheresis)
7. attendance (to be completed by reception on the form)
8. vein suitability (to be completed by reception on the form)
9. person performing the vein assessment (short code) (to be completed by reception on the form)
10. call-back date (to be completed by reception on the form)

Please note that in the case of an email address, it is not necessary for the personal data . For example, the email address does not need to contain the data subject's name. The data subject is free to decide whether to provide an existing email address that contains information revealing their identity.

III.1.4. Use of a data processor

Website operator:

Data processor: Aktiv Digital Media Kft.

Registered office: 5600 Békéscsaba, Lencsési út 35-37, 8th floor, 46.

Company registration number: 04-09-014773

Tax number: 26629827-2-04

Email: office@aktivdigital.hu

Telephone number: +36 30 / 360 9350

Data processor engaged in connection with certain IT services: Data processor:

Cogitnet Kft.

Registered office: 1037 Budapest, Gyógyszergyár utca 58.

company registration number: 01-09-948383

Tax number: 23000623-2-41

email: iroda@cogitnet.eu

telephone number: +36-1 710 0000

Data processor engaged to perform system administration tasks related to the company's internal server software (PC-Blut):

Data processor: Biotest Hungaria Kft.

Registered office: 2045 Törökbálint, Torbágy

utca 15/a Company registration number: 13-

09-095141

Tax number: 14380817-2-13

email: biotest@biotest.hu

telephone number: +36 23 511 311

The software for the company's internal server (PC-Blut) is provided by:

Data processor: Martin Schmidt Softwareentwicklung GmbH

Registered office: D - 74538 Rosengarten, Pfarrgasse 16

Company registration

number: HRB 722167 Tax

number: DE236838913

III.1.5. Data subjects

Those persons who wish to register for the suitability test and phlebotomy and who consent to the processing of their data.

III.1.6. Duration of data processing

Data on the platform is deleted every 2 years.

III.1.7. Method of data processing

Data processing is carried out manually and electronically as follows: the data provided on the website is transferred to the company's internal system.

Data processing is carried out automatically by electronic means as follows: donors' data is processed by the IT system during the login process. Automated data processing does not involve profiling or any other procedure that would result in the ; it serves solely to facilitate access to the interface designed for booking appointments.

IV. Data processing related to direct marketing

If the data subject consents, the Company may send newsletters and text messages to the provided email address or telephone number for direct marketing purposes, make satisfaction or marketing-related calls, or reach the data subject via advertisements on social media platforms the data subject via the Company or through advertisements on social media platforms. The database used to facilitate the sending of newsletters is the one created through registration on the <https://plazmaadas.hu/feliratkozas> website, as well as the database of donors who have given their marketing consent in PC-Blut.

The collection of applicants' data for marketing purposes also takes place at reception during registration.

IV.1. Name of data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdp@gdprtancsadas.eu)

IV.2. Purpose of data processing

When engaging in direct marketing, the company contacts natural persons via direct consumer channels (e.g. third parties such as the Facebook application) or through intermediaries and data processing partners, in the course of which promotional materials relating to the company's activities are disseminated.

IV.3. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

Act XLVIII of 2008 on the fundamental conditions and certain restrictions of commercial advertising activities.

IV.4. Scope of data processed in the course of direct marketing activities

1. email address (upon subscription)
2. name (upon subscription)
3. plasma donation history (during registration)
4. donor number (at reception)
5. name of eligibility campaign (at reception)
6. date of birth (at reception)
7. how you found out about the company (at reception)
8. Have you donated blood before? (at reception)
9. occupation (at reception)
10. Date of first eligibility check (at reception)
11. PC-Blut occupation (at reception)
12. town (at reception)

IV.5. Use of a data processor

Company engaged in direct marketing activities: data

processor: Aktiv Digital Media Kft.

Registered office: 5600 Békéscsaba, Lencsési út 35–37, 8th floor, flat 46

Company registration number: 04-09-014773

Tax number: 26629827-2-04

Email: office@aktivdigital.hu

Telephone number: +36 30 / 360 9350

Company engaged in direct marketing activities: data

processor: CallCom ZRt.

Registered office: Nyíregyháza, Sóstói út 31, 4400

Company registration number: 15-10-040395

Tax number: 25376241-2-15

Email: kapcsolat@callcomm.hu

telephone number: +36-70-677-8522

Direct marketing (Facebook) operator:

Data controller: Meta Platforms Ireland Limited

Registered office: Merrion Road, Dublin 4, D04X2K5,

Ireland Company registration number: IE00454538

Tax number: IE9692928F

Direct marketing (Google) operator:

Data controller: Google Ireland Limited

Registered office: Gordon House, Barrow Street, Dublin 4, D04 E5W5, Dublin,

IRELAND Company registration number: IE0002914077

Tax number: IE6388047V

Company handling telephone calls: Data

controller: Comnica Kft.

Registered office: 1119 Budapest, Fehérvári út 99.

Company registration number: 01 09 895207

Tax number: 14242036-2-43

SMS provider:

Data controller: Yettel Magyarország Zrt.

Registered office: 2045 Törökbálint, Pannon
út 1.

Company registration number: 13 10 040409

Tax number: 11107792-2-44

IV.6. Scope of data processing

Those persons who, for the purposes of direct marketing activities, consent to receiving SMS messages, telephone calls or newsletters by email.

IV.7. Duration of data

processing Until consent is
withdrawn.

IV.8. Method of data processing

Data processing is carried out manually and electronically as follows: the email addresses and telephone numbers provided are stored in a separate database, and advertising material is sent to these contact details.

IV.9. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include in its data protection policy safeguards that guarantee the protection of data subjects' rights.

The Company undertakes to prepare employee information documents relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

V. Data processing related to the use of PlazmApp

The PlazmApp mobile application enables Plazmaszolgálat Kft.'s plasma donors to easily and quickly book an appointment for plasmapheresis via their mobile phones, to be immediately informed of current promotions at the relevant centre, and to easily contact Plazmaszolgálat online.

V.1. Name of data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

V.2. Purpose of data processing

To facilitate appointment booking and communication.

V.3. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

Act XLIV of 2008 on the basic conditions and certain restrictions of commercial advertising activities.

V.4. Scope of data processed during the use of PlazmApp

1. date of birth
2. donor number

V.5. Use of a data processor

Company engaged in direct marketing activities: data

processor: Aktiv Digital Media Kft.

registered office: 5600 Békéscsaba, Lencsési út 35-37, 8th floor, 46

Company registration number: 04-09-014773

Tax number: 26629827-2-04

Email: office@aktivdigital.hu

telephone number: +36 30 / 360 9350

V.6. Scope of data processing

Donors who log in to the application.

V.7. Duration of data processing

30 years

V.8. Method of data processing

Access is granted to data entered into the system during the provision of the service – as a result of the continuous provision and maintenance of the application.

V.9. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include in its data protection policy safeguards that guarantee the protection of data subjects' rights.

The Company undertakes to prepare employee information documents relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

VI. Data processing in connection with prize draws

Prize draws are managed and organised by Plazmaszolgálat. The winners' details are recorded in a report, which includes the winners' names and/or donor numbers and the names of those participating in the draw. Players complete a data processing declaration in which they accept the rules of the competition and provide the following details. The retention period and destruction of data are set out in the rules. Winners are compiled into a separate list and notified by reception or customer service

VI.1. Name of the data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

VI.2. Purpose of data processing

Participation in prize draws.

VI.3. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

Act XLVVI of 2008 on the fundamental conditions and certain restrictions of commercial advertising activities.

VI.4. Scope of data processed in the course of direct marketing activities

1. name
2. donor number
3. contact details

VI.5. Scope of data subjects

Those persons participating in the prize draw.

VI.6. Duration of data processing

Entry forms will be deleted after the results are announced; documents relating to winners will be deleted after 8 years.

VI.7. Method of data processing

Data processing is carried out manually and electronically as follows: the email addresses and names provided are stored in a separate database, and notifications regarding the prize draw will be sent to these contact details.

VI.8. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include in its privacy policy safeguards that guarantee the protection of data subjects' rights.

The Company undertakes to prepare employee information documents relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

VII. Data processing related to chatbot activities If the data

subject consents, they may initiate communication with the chatbot.

VII.1. Name of the data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

VII.2. Purpose of data processing

At Plazma Pont, to provide information regarding plasma donation via the chatbot channel and to request customers' contact details.

VII.3. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

Act XLVIVII of 2008 on the fundamental conditions and certain restrictions of commercial advertising activities.

VII.4. Scope of data processed in the course of direct marketing activities

1. Surname and first name
2. Email address
3. Telephone number
4. Home address
5. Questions and answers posted in the system

VII.5. Use of a data processor

Company operating the chatbot:

Data processor: Attrecto Zrt

Registered office: 9024 Győr, Wesselényi utca 6.

Company registration number: 08 10 001846

Tax number: 23717154-2-

08 Server provider:

Data processor: Microsoft Ireland Operations, Ltd.

Registered office: South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland

Company registration number: 979920237

Tax number: IE8256796U

VII.6. Data subjects

Individuals who communicate with the chatbot.

VII.7. Duration of data

processing: 90 days.

VII.8. Method of data processing

Access is granted to data entering the system during the provision of the service – as a result of the continuous provision and maintenance of the application.

VII.9. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include in its data protection policy safeguards that guarantee the protection of data subjects' rights.

The Company undertakes to prepare employee information documents relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

VIII. Data processing related to Messenger activities

The data subject may also initiate communication via the Messenger application.

VIII.1. Name of the data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdp@gdprtanacsadas.eu)

VIII.2. Purpose of data processing

At Plazma Pont, to provide information regarding plasma donation via the Messenger channel and to request customers' contact details.

VIII.3. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

Act XLV of 2008 on the basic conditions and certain restrictions of commercial advertising activities.

VIII.4. Scope of data processed in the course of direct marketing activities

1. Surname and first name
2. Email address
3. Telephone number
4. Address
5. Questions and answers posted in the system

VIII.5. Joint data controller

Company operating Messenger and Facebook: data

controller: Meta Platforms Ireland Limited

registered office: Merrion Road, Dublin 4

Company registration

number: IE00454538 Tax

number: IE9692928F

VIII.6. Data subjects

Individuals who communicate via the Messenger app.

VIII.7. Duration of data

processing: 90 days.

VIII.8. Method of data processing

Access is granted to data entering the system during the provision of the service – as a result of the continuous provision and maintenance of the application.

VIII.9. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include in its data protection policy safeguards that guarantee the protection of data subjects' rights.

The Company undertakes to prepare employee information documents relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

IX. Data processing in connection with recruitment

The purpose of this notice is to provide information on data processing related to recruitment to those who apply for job vacancies by submitting their CVs. Plazmaszolgálat Kft. seeks to find prospective employees through job advertisements published on online platforms (websites). Plazmaszolgálat Kft. only requests that applicants provide data which is strictly necessary for assessing their suitability for the advertised position. Plazmaszolgálat Kft. publishes job advertisements on its own website (<http://www.plazmaadas.hu/karrier>) and on the job advertisement portals it uses. In order to select the most professionally suitable candidate from among those applying for the job advertisements, personal data will be processed that is essential for the establishment, performance and termination of the employment relationship; therefore, we specifically ask data subjects to provide data and information that is relevant for professional assessment.

IX.1. Name of the data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

IX.2. Purpose of data processing

The purpose of data processing is to select the most suitable candidate for the establishment of an employment relationship, which requires the identification of the data subject, maintaining contact with the data subject, and obtaining relevant data and information for the assessment of professional suitability, such as data relating to previous studies and places of employment, data provided to ascertain qualifications and professional competencies, as well as information regarding language skills.

IX.3. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

By actively applying for the job vacancy, i.e. by submitting a CV via email or through websites, the data subject accepts this data processing policy and, by this unambiguous act of confirmation, consents to the processing of their personal data in the manner, for the duration and to the extent specified in this policy.

IX.4. Scope of data processed

- | | |
|--|---|
| 1. Surname and first name, date of birth, place of birth, mother's name. subject. | Identification of the data subject. |
| 2. Relevant contact details provided by the applicant (e.g. email address, telephone number, residential address) | Contact details. |
| 3. Data relating to previous studies and places of employment , data provided to ascertain qualifications and professional competencies, and | Data processed for the purposes of professional assessment. |

Should the data subject provide the company with any other data not relevant to professional assessment, we shall regard such data as having been voluntarily provided to the company, and by submitting it, the data subject consents to the processing of their personal data in the manner, for the duration and to the extent specified in this policy, provided that we do not take such data into account when assessing suitability for the position.

IX.5. Use of a data processor

During the recruitment process, job advertisements are also available on various job portals; if the data subject applies for the position via such a portal, they can find the data processor's details and data processing notice on the portal where they applied for the position.

IX.6. Data subjects

Individuals who wish to participate in the selection process by submitting their CV.

IX.7. Duration of data processing

We process the data until the selection process is completed, after which we delete it; we also delete it if the data subject withdraws their application.

The data subject may withdraw their application by contacting inghr@plazmaszolgalat.hu.

IX.8. Method of data processing

Data processing is carried out manually, electronically and on paper: applicants' CVs are sent to the company either by email or via online platforms (websites), which the company's staff manage on the company's data storage devices or in printed form until they are deleted or destroyed. Furthermore, we will notify the data subject by email that we have received their CV, and also that they were not selected at the end of the selection process.

IX.9. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include in its data protection policy safeguards that guarantee the protection of data subjects' rights.

The Company undertakes to prepare employee information documents relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for its employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

X. Data processing in connection with reporting abuses

Data subjects may report abuses and, with their consent, their data will be stored.

X.1. Name of the data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

X.2. Purpose of data processing

To maintain communication in the event of reports of misuse.

X.3. Legal basis for data processing

Article 6(1)(a) of the GDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes.

Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons reporting breaches of Union law.

X.4. Scope of data processed in the course of direct marketing activities

1. Name
2. Telephone number
3. Email address

X.5. Scope of data subjects

Those who submit a report.

X.6. Duration of data processing

For 5 years or until consent is withdrawn.

X.7. Recipients

In the event of legal proceedings, potentially legal professionals and/or authorities.

X.8. Method of data processing

Data processing is carried out manually and electronically as follows: the email addresses and names provided are stored in a separate database, which is accessible only to the compliance officer and the operations director.

X.9. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include in its data protection policy safeguards that guarantee the protection of data subjects' rights.

The Company undertakes to prepare employee information documents relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

XI. Data processing in connection with a simplified contract of mandate

Plazmaszolgálat Kft. processes the personal data of contractual partners during the conclusion and performance of the simplified agency agreement. Some of the data is obtained directly from the data subject, and in the case of the donor mentor programme, it is sourced from the PC-Blut system. Following scanning, the contracts

, they are uploaded to the contract repository, with the exception of contracts relating to the donor mentor programme, which are stored on-site at the centres.

XI.1. Name of the data controller

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi ([gdpr@gdprtanacsadas.eu](mailto:gdp@gdprtanacsadas.eu))

XI.2. Purpose of data processing

The conclusion and performance of the simplified contract of engagement, the performance of duties, payroll processing, and the fulfilment of relevant legal obligations (tax, social security and accounting).

XI.3. Legal basis for data processing

Article 6(1)(b) of the GDPR: processing is necessary for the performance of a contract to which the data subject is a party.

Article 6(1)(c) of the GDPR: compliance with a legal obligation (e.g. tax and social security contribution obligations).

Act V of 2013 on the Civil Code (provisions on contracts of mandate).

Act C of 2000 on Accounting.

Act XCII of 2003 on the Rules of Taxation.

XI.4. Scope of data processed

1. Tax identification number
2. Social Security Number
3. Contact details (telephone number, email address)
4. Bank account number
5. Signature
6. Mother's name
7. Address
8. Place of birth
9. Date of birth
10. Birth name
11. Name used

XI.5. Data subjects

Natural persons entering into a simplified contract of mandate, including those participating in the donor mentor programme.

XI.6. Duration of data processing

For 5 years following reaching retirement age, in accordance with legal requirements.

XI.7. Recipients

Authorities where required by law (e.g. NAV, NNGYK).

XI.8. Method of data processing

Data is processed electronically and on paper.

- Electronic storage: In the PDU folder on the Plazma server, in the PlazmaBee system, and in the payroll system.
- Paper-based storage: contracts in the contract archive following scanning; in the case of the donor mentor programme, at the centres.

XI.9. Technical and organisational measures relating to data processing

The Company ensures and facilitates the exercise of the data subject's rights in relation to data processing, with particular regard to the right to information.

The Company undertakes to include safeguards in its privacy policy that ensure the protection of data subjects' rights.

The Company undertakes to prepare employee information notices relating to data processing with the utmost care in order to protect the rights and freedoms of data subjects.

The Company organises training for employees to ensure they are aware of their obligations regarding data processing and are prepared to deal with the rights of data subjects.

XII. Use of cookies

Cookies are small data files that are placed on your computer when you visit a website; they are created, saved and stored by the websites you visit. The most commonly most commonly used browsers (Chrome, Firefox, etc.) – generally – accept and allow the downloading and use of cookies by default; however, it is possible for the user to reject or disable them by to reject or disable them, and cookies stored on the computer can also be deleted. The 'Help' menu of each browser provides further information on the use of cookies.

We generally distinguish between two types of cookies: one group comprises those that do not require the user's consent. We provide information about these when you first visit our website; examples include "user input" cookies, authentication cookies, user-centred security cookies, multimedia player session cookies, load-balancing session cookies, and cookies that help customise the user interface.

The other group comprises cookies that require the user's consent; where data processing begins as soon as the site is visited, we inform the user of these at the start of their first visit and request their consent. Examples of such cookies include

social media tracking cookies, cookies related to external advertisements, and our own analytics cookies.

Accepting cookies is not mandatory; however, we inform users that may affect the functioning of the website; therefore, we accept no liability in cases where our website may not function as expected if cookies are not enabled.

XII.1. Cookies used

Type	Name	Consent	Description	Purpose	Validity
Session Cookies	Cookies essential for the provision of the service	Not required	These cookies are necessary to enable the website for users	Ensuring the website functions	The browsing work
Functional cookies	Cookies that store previous settings	Requires	Saving of data entered during login ("Stay logged in"), or acceptance "I accept the use of cookies")	Remembering user settings	<i>Depends on settings, but maximum 2 years</i>
Tracking cookie for the purpose of tracking visits (third party)	Google Analytics (_gat and _ga)	Requires	The site collects information, as well as user's activity	During your visit to the website, third (e.g. Google) services are 2 years	<i>2 years</i>

Behavioural advertising external cookies (third party)	Google Remarketing, Facebook Pixel, Google Conversion Tracking	Requires	Behavioural advertising.	Behavioural advertising, which advertisements	180 days
Electronic online activities (from third from)	acq_homepage_ctas_starting_on_basic_assignment	Requires	IP address, referrer URL and domain, device type, operating system and browser type, window size and content	In order to , in accordance with our Privacy Policy ,	2 months
Functional cookies (from third parties)	hj_visitor	Requires	Name, email address, cookie identifiers	To operate and develop Hotjar's business , in accordance with our Privacy Policy in accordance with	Session
Functional cookies (from third parties)	_dd_s	Requires	Name, address, telephone number	For the , in accordance with our Privacy Policy ,	15 minutes
Analytics	hjSession{site_id}	Yes	Unique ID for tracking the current session track	Session state retention	30 minutes
Analytics	_hjIncludedInPageviewSample	No	Determine whether the user is included in the sample	Page performance	30 minutes

Analytics	_hjIncludedInSessionSample	No	Determine whether the user is included in the sample	Page performance	30 minutes
Analyst	_hjClosedSurveyInvites	No	Records if a user has completed a survey	Surveys to avoid	1 year
Analyst	_hjDonePolls	No	Records if a user has completed a opinion survey	To prevent the repeated to avoid	1 year
Analyst	_hjMinimizedPolls	No	Records if a user has minimised a public opinion poll	Opinion polls in minimised state display display	1 year
Analyst	_hjShownFeedbackMessage	No	Records if a user has viewed or reacted to a feedback message	Repeated appearance	1 year
Analyst	_hjid	Yes	Unique ID for tracking users across visits .	User experience improvement	1 year
Functional	_hjRecordingLastActivity	No	Records the last user activity during the session during	Preserving session activity	Session End of session

Functional	_hjTLDDTest	No	Define the most general bb cookie path	Ensuring cookie path compatibility	Work End of work
Functional	_hjUserAttributesHash	No	Cache the user attributes to identify changes to the data	Ensuring faster data processing	Workflow End of work
Functional	_hjCachedUserAttributes	No	Stores the user attributes collected by Hotjar has collected	Ensuring faster data processing	Work End of work
Functional	_hjLocalStorageTest	No	Determine whether Hotjar scripts are able to use local storage	Functionality check	100 ms
Functional	_hjSessionTooLarge	No	Detects if session data is too large	Data retention's optimisation	Session End
Analyst	_hjFirstSeen	Not	Define whether the user is new or returning	Analysis of visitor behaviour	Work End of work
Functional	_hjViewportId	No	Stores the user's viewport information	Viewport preservation of view	End of End of work
Analytics	hjSessionUser{site_id}	Yes	Unique ID for tracking users tracking	User experience improvement	1 year

Analytics	_omappvp	Yes	Unique ID for tracking returning visitors track	Identifying returning visitors	11 years
Analytics	_omappvs	Yes	Unique ID for tracking new visitors	Identifying new visitors	20 minutes
Analytics	_omSessionPageviews	Yes	Tracks during the visit pages viewed number	Analysis of visitor behaviour	Work End of
Functional	_omSessionID	Yes	Unique Identifier for the session	Session Identification	Session End
Analytics	_omGlobalArticleCount	No	Tracks viewed visited	Analysis of visitor behaviour	1 day
Analytics	_omGlobalVisitCount	No	Tracks the number of visits	Analysis of visitor behaviour	1 year
Functional	_omGlobalArticleLastView	No	Tracks the last viewed article time	Analysis of visitor behaviour	1 year
Analytics	_omSessionStart	No	Determine the start of the session	Session ID	Session End
Functional	_omSessionEnd	No	Determine the end	Session ID	End End

Analyst	_omSessionPreviousID	No	Tracks the previous session ID	Session connection is	Session End
Functional	_omTestSessionID	Not	Unique ID for the test session	Test session identification	Session End
Functional	_omUserID	No	Unique Identifier for users	User identification	11 years
Functional	_omVisitorID	No	Unique ID for visitors	Identifying visitors	11 years
Functional	_omConversionID	No	Unique identifier for conversions z	Conversion tracking	11 years
Functional	_omLastConversionTime	No	Tracks the last conversion time	Conversion tracking	11 years
Analytics	_omCampaignID	No	Follows the campaign IDs	Campaign tracking	1 year
Analytics	_omPageLoadTime	No	Tracks page page time	Website performance	1 day
Analytics	_omPageUnloadTime	No	Tracks page time time	Website performance	1 day
Analytics	_omPageviews	No	Tracks the the number of page views	Analysing visitor behaviour	1 day

You can find detailed information about third-party cookies at the links below:

Google Analytics - <https://policies.google.com/technologies/types?hl=hu> Google
Remarketing – <https://policies.google.com/technologies/types?hl=hu> Facebook Pixel
- <https://www.facebook.com/policies/cookies/>
Google Conversion Tracking - <https://policies.google.com/technologies/types?hl=hu>
Optimonk - <https://support.optimonk.hu/hc/hu>

XIII. Rights of data subjects

We will assess all requests relating to the exercise of rights within 25 days of receipt. Data subjects may exercise the rights described below at the following address:

Data Controller: Plazmaszolgálat Limited Liability Company

Registered office: 2045 Törökbálint, Torbágy utca 15/A

Company registration number: 13-09-121293

Tax number: 14380817-2-13

Email: aktualis@plazmaszolgalat.hu

Data Protection Officer: Dr Zsombor Sümegi (gdpr@gdprtanacsadas.eu)

XIII.1.1. Right to information

The principle of fair and transparent data processing requires that we inform data subjects, prior to the commencement of data processing, of the fact and purpose of the data processing, as well as the identity of the data controllers, the data protection officers, the scope of the data processed, the legal basis, duration and method of data processing, and the data processors used during data processing. Under the right to information, data subjects have the opportunity to request information regarding the processing of their data, in which case they will receive personalised information.

With regard to access to data in medical records, the provisions of the Health Care Act and the Health Care Act on Personal Data must be taken into account. Thus, the data subject may access their own health and personal identification data on the basis of verbal information provided by a doctor.

XIII.1.2. Withdrawal of consent

The data subject is entitled to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of data processing based on consent prior to the withdrawal.

XIII.1.3. Right to rectification

The data subject has the right to request the rectification or completion of data concerning them that is processed by us.

XIII.1.4. Right to erasure/right to be forgotten

Data subjects are entitled to request the erasure of their data processed by us. Please note that a request for erasure will be refused if there is an obligation to retain the data.

XIII.1.5. Right to restriction of processing

The data subject is entitled to request that we restrict/block the processing of their data (by clearly marking the restricted nature of the data processing and ensuring that it is processed separately from other data). The restriction shall remain in place for as long as the reason specified by the data subject makes it necessary.

XIII.1.6. Right to lodge a complaint or to initiate proceedings

The data subject is entitled to lodge a complaint with the supervisory authority or to initiate proceedings before it, and to seek effective judicial remedy if they consider that their rights have been infringed in connection with the processing of their data or the exercise of their rights in relation to such processing. In the event of judicial redress, the data subject may bring a civil action, the adjudication of which falls within the jurisdiction of the regional court. The action may also be brought before the regional court in the data subject's place of residence, at their discretion (a list of regional courts and their contact details can be found via the following link: <http://birosag.hu/torvenyszekkek>).

Contact details of the competent supervisory authority:

National Authority for Data Protection and Freedom of

Information Address: Budapest, Falk Miksa u. 9-11, 1055

Postal address: 1363 Budapest,

PO Box 9.

Email: ugyfelszolgalat@naih.hu

Telephone: +36 (1) 391-1400

We ask data subjects to contact our Company before submitting their complaints to the supervisory authority or the courts, in order to facilitate consultation and the swiftest possible resolution of the issue.

XIV. Scope of the Privacy Notice This

Privacy Notice shall enter into force on 1 September 2025.