

INFORMATION NOTE ON DATA MANAGEMENT**Data management related to employment agency and recruitment services, and hiring for own purposes**

HUNAM Personnel Solutions Kft. is looking for workers for placement and for its own purposes. The purpose of this notice is to provide information to applicants for positions advertised by HUNAM Personnel Solutions Kft. on how HUNAM Personnel Solutions Kft. handles applicants' personal data in the context of applying for job advertisements.

1. DATA CONTROLLER

With regard to the data management described in this information note, the controller of personal data is:

HUNAM Personnel Solutions Kft.

Registered office: H-1114 Budapest, Bartók Béla út 15/D. 2. em. 18. ajtó;

Company registration number: 01-09-992573

Court of registration: The Court of Registration of the Metropolitan

Tribunal Court of Budapest; tax number: 13219576-2-43

(hereinafter referred to as: „HUNAM Personnel Solutions Kft.” or „Company”)

Our contact details in issues related to data management:

Postal mailing address: H-1117 Budapest, Budafoki út 91-93. K. épület 5. emelet;

E-mail address: adatvedelem@hunam.hu

Phone: +36 1 372 0692

Website: hunam.hu

Electronic availability of the Information Note on Data Management: www.hunam.hu

Data Protection Officer: Beáta Torma

Postal mailing address: H-9027 Győr Budai u. 5/a.

E-mail address: adatvedelem@hunam.hu

Phone: +36 96 508 000

If you have any questions about the data management covered by this information note, please contact us at the central contact details specified above.

2. MANAGEMENT OF APPLICANTS' PERSONAL DATA DURING PLACEMENT, RECRUITMENT AND HIRING OF OWN WORKFORCE

Our company manages the personal data of applicants for job advertisements as part of its employment agency and recruitment services. The advertised positions may also include job opportunities offered by our company itself, i.e., job advertisements through which we are seeking employees for ourselves.

If you apply for one of our positions, you can decide whether you consent to us processing your personal data solely in connection with the position you are applying for, or whether you also consent to us saving your CV and any additional personal data you provide during the application process in our job seeker database. The advantage of the job seeker database is that we can consider your submitted resume also for other job opportunities and contact you with further job offers.

The table below summarizes what data we process, for what purpose, on what legal basis, and for how long.

	APPLICATION FOR A SPECIFIC JOB ADVERTISEMENT	APPLICATION WITHOUT A JOB ADVERTISEMENT (fly-in CVs)	JOB SEEKER DATABASE
Purpose of data management	Conducting the selection process for applicants to job advertisements and preparing for the selection process.	If someone is not applying for an advertised position but is simply inquiring whether we currently have a job that matches their expectations, the purpose of data management is to respond to that inquiry.	Offering suitable job opportunities to individuals listed in the database.
The legal basis of data management	Your voluntary consent (Article 6 Paragraph (1) (a) of the GDPR). Without consent, the applicant cannot participate in the selection process.		
Form of granting consent	Sending your CV, cover letter, personal data, providing additional personal data during the application process by e-mail, telephone, in person or by other means, making it available.		By making a separate declaration of consent.
The scope of personal data managed	- <u>Minimum information required for the application:</u> <ul style="list-style-type: none"> • the applicant's surname, first name, and phone number (for identification and contact purposes); • the CV submitted by the applicant, all data and information contained therein: including also his or her photograph, age, professional background, interests, etc. (All of this information helps us select the right employees and offer applicants suitable job opportunities.); 		

	<ul style="list-style-type: none"> • the name of the applicant’s current employer (Based on agreements with certain partners, we are not permitted to contact their employees with job offers or refer them to other employers during the period of cooperation with them or for a specified period thereafter. In order to comply with this contractual obligation, we process applicants’ personal data regarding their current employer. If applicants do not consent to us processing information about their current employer, we will not be able to provide them with placement services.) • the applicant’s educational background, qualifications, and previous work experience (for the purpose of assessing suitability for the job); • data on changed work capacity, if required by the job in question (e.g., standing work, physical work) <p>- <u>The following data may also be managed:</u></p> <ul style="list-style-type: none"> • e-mail address (for contact purposes) • jobs that match your interests (so we can recommend the right project for you) • date of birth (if required for the job in question (e.g. physical work, or to enable us to carry out preliminary screening based on age for the job in question) • additional personal data provided/made available by the applicant during the selection process: e.g., salary requirements, willingness to work night shifts, willingness to relocate, etc. (so that we can offer you a job opportunity that suits you) • notes taken during the interview with the applicant (if any); • certificate of good conduct (if it is justified to present it); • if either we or the future employer requests that you take an aptitude test (language test, reading comprehension test, monotony tolerance test, etc.), the results of the aptitude test and the conclusions that can be drawn from it. 			
Duration of data management	<p>We will delete personal data processed for the purposes set out in this notice at any time at the applicant’s request.</p> <p>We would like to draw applicants’ attention to the fact that if they request the deletion of their data before the selection process is completed, they will no longer be able to participate in the selection process, as we will no longer have access to the application materials required for evaluation.</p> <p>Even if no request for deletion is made, we will delete personal data in the following cases:</p> <table border="1" data-bbox="400 1697 1401 2096"> <tr> <td data-bbox="400 1697 751 2096"> Three months after the selection process is completed, we will delete the personal data processed in connection with the job advertisement, unless we can continue to manage your personal data for other purposes set out in this information note. </td> <td data-bbox="751 1697 1078 2096"> 30 days after it has been established that there are no vacant positions corresponding to the application in question, and the applicant has been informed of this and has not requested to be included in our job seeker database. </td> <td data-bbox="1078 1697 1401 2096"> Two years after registering in the database. </td> </tr> </table>	Three months after the selection process is completed, we will delete the personal data processed in connection with the job advertisement, unless we can continue to manage your personal data for other purposes set out in this information note.	30 days after it has been established that there are no vacant positions corresponding to the application in question, and the applicant has been informed of this and has not requested to be included in our job seeker database.	Two years after registering in the database.
Three months after the selection process is completed, we will delete the personal data processed in connection with the job advertisement, unless we can continue to manage your personal data for other purposes set out in this information note.	30 days after it has been established that there are no vacant positions corresponding to the application in question, and the applicant has been informed of this and has not requested to be included in our job seeker database.	Two years after registering in the database.		

	In the case of continuously open positions, we delete the applications received and the personal data managed in connection with them after 1 year following the application. If we close the position before that, the above retention period (closure + 3 months) applies.		
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3. LINKEDIN

Our colleagues also use the services of LinkedIn to search for potential candidates, in accordance with LinkedIn's terms of use.

If our colleagues believe that you may be a good fit for a particular position, they will contact you via LinkedIn. In the message, we will let you know who we are and why we would like to contact you.

We manage your personal data published on LinkedIn on the LinkedIn platform and do not export it from there, unless you expressly consent to this. You can also provide us with your personal data by applying for a specific job through our website or registering your CV in our database.

The legal basis for our data management in connection with establishing and maintaining LinkedIn connections is our legitimate interest (Article 6(1)(f) of the GDPR) in informing potential candidates about current job opportunities that are relevant to them.

LinkedIn is a professional social networking site. A LinkedIn profile is essentially the given person's professional resume. Given that this is a popular and well-known forum primarily intended for increasing professional visibility and career development, LinkedIn members are aware that recruitment agencies can also contact them with job offers via LinkedIn. In its terms of use and privacy policy, LinkedIn draws users' attention to the fact that the personal data they publish may be accessed by third parties, in particular recruitment agencies, who may contact them with job offers.

LinkedIn settings also give users countless options for adjusting the content and visibility of their profiles, allowing them to freely decide what to make publicly available and what their verified connections can see.

4. PROFESSION

We are entitled to view and download CVs uploaded to the Profession CV database in accordance with Profession's terms of use, and to process the personal data contained therein for 90 days from the date of download. If the data subject has not consented to the processing of their CV by us for more than 90 days, either by applying for one of our job advertisements or by registering in our own CV database, we will no longer process the CV downloaded from the Profession website after 90 days.

5. FURTHER DATA MANAGEMENT RELATED TO THE PERFORMANCE OF THE MEDIATION AGREEMENT

5.1. Pre-screening (name-check)

For some of our partners, we need to carry out a preliminary screening to check whether the applicant is already listed in the company's database, for example because another recruitment agency has already recommended them to the partner in question, or because they have already worked for that partner or a company belonging to its group. If the applicant is already listed in the database of the given partner, it is not in our interest to initiate mediation. In view of this, for the purposes of pre-screening, we may typically pass on the applicant's name and e-mail address to the potential employer and, in some cases, if further data is required for identification purposes, the applicant's mother's name and date of birth.

We process personal data sent for pre-screening based on our legitimate business interest (Article 6(1)(f) of the GDPR) and forward it to our client. If we are not entitled to a commission fee based on the referral of a given person, then it is not in our interest to continue referring that person to the given client.

We give applicants the chance to let us know in advance which employers they don't want us to contact, so we can avoid sending their personal data to employers they don't want us to.

If the result of the preliminary screening is negative, i.e., if the person in question cannot be mediated, we will delete it after receiving the feedback. In the event of positive feedback, i.e. if the person in question is not listed in the client's database, we will retain the results of the preliminary screening for the limitation period (5 years) for the enforcement of our claim for the commission fee arising from the given mediation, based on our legitimate interest in enforcing the claim.

5.2. Settlement of commission fees

In order for our company and the employer who commissioned it to settle the fee for the mediation service, it is necessary for our company to be able to prove which person it referred to the given partner and when, and for the partner to notify our company whether or not it is employing the referred employee. When the mediated person is employed by our client, it is also important to know when the employment starts and under what legal relationship it takes place. If our commission fee is determined based on a specified percentage of the basic salary of the person mediated, then we also need to know the amount of the contractual basic salary of the person mediated in order to calculate the commission fee.

The personal data managed for this purpose therefore includes the fact and date of placement and employment by the client, or refusal of employment, and in the case of a percentage-based placement fee, the amount of the successfully placed person's contractual base salary.

The legal basis for data management is our legitimate interest in enforcing the commission fee (Article 6(1)(f) of the GDPR). In our opinion, our data management based on legitimate interest is proportionate to the restriction of the rights of the data subject in relation to their personal data, as without this information we would not be able to enforce our commission fee.

The data subject is aware that they will be contacted by the employer concerned in the context of job placement. By using our services, the data subject acknowledges that their personal data will be processed for purposes closely related to the service.

If our specific client does not employ the referred person during the period specified in the contract concluded with them (fee-paying period), we will no longer process the personal data supporting the fact of mediation on the basis of this section after the expiry of the limitation period for our claim for the mediation fee (5 years after the end of the fee-paying period).

In the event of successful mediation, proof of this fact is also required for tax purposes, therefore we delete personal data certifying successful mediation after the expiry of the tax rights limitation period.

5.3. Data management for the purpose of fulfilling a mediation guarantee

Within the framework of job placement, our company may guarantee to its client partner that the person placed by it meets the search criteria specified by the partner. The guarantee, its duration, and conditions are subject to the mediation agreement concluded with the respective partner and may therefore vary from case to case. Under the guarantee, if the employment relationship of a person referred by our company is terminated during the guarantee period for a reason covered by the guarantee, our company undertakes to refer a new candidate to the partner.

If our company provides a guarantee as described above, we will need to process the application materials of the applicants covered by the guarantee and their personal data specified below, which are necessary for the assessment of the guarantee claim, for the duration of the guarantee and the limitation period for guarantee claims.

For the purpose of assessing guarantee obligations, we handle the following:

- the application materials of the referred candidate (for the purpose of assessing whether or not the candidate meets the selection criteria specified by the partner);
- the fact and date of establishing an employment relationship with the partner (for the purpose of calculating the guarantee period);
- the employment conditions of the placed employee that are relevant for the assessment of the guarantee claim (position held, compliance with the employment conditions specified by the partner);
- the manner, reason, and date of termination of employment (for the purpose of examining the conditions of the guarantee).

The processing of the above personal data is based on our legitimate interest in assessing the guarantee and the legitimate interest of our guarantee partner (legal basis pursuant to Article 6(1)(f) of the GDPR). It is not possible to enforce and assess the guarantee without managing the above personal data, therefore, in our opinion, the management of your personal data above is proportionate to our interests.

5.4. Enforcement of a penalty clause against the client for further mediation

If the mediation contract contains a provision to this effect and our client refers the person we have referred to a third party without our permission, our client shall be liable to pay us a contractual penalty. For the purpose of enforcing the contractual penalty, we process the data necessary for identifying the mediated person, the evidence proving the mediation (e.g. an e-mail certifying the mediation), and the evidence proving the client's breach of obligation. We will delete this personal data after the expiry of the 5-year limitation period for our contractual penalty claims.

The legal basis for our data management is our legitimate interest in enforcing the contractual penalty clause (Article 6(1)(f) of the GDPR). The management of the above personal data is necessary for the enforcement of the contractual penalty, which serves our business interests. The claim cannot be enforced without the management of personal data. We also believe that the management of personal data for this purpose does not disadvantage the data subject, and therefore, in our opinion, the data management is proportionate to the restriction of the data subject's right to dispose of their personal data.

6. WHO CAN ACCESS YOUR PERSONAL INFORMATION?

The employees of our company

Applications and the personal data contained therein are accessible to those employees of our company whose job responsibilities include handling matters related to recruitment.

Prospective employers

We will inform you about the prospective employer before we disclose any of your personal data, ensuring that you can decide whether you really want to apply for the job and avoiding your current employer finding out about your interest in the job or you coming into contact with a company you do not wish to work for. If you consent to the transfer of your data or apply for a job with your employer's knowledge, we may transfer your CV or, in its absence, the following data required for the application to the potential employer for the purpose of being able to **select** from among applicants:

- the names of applicants;
- information about the applicants' education, qualifications, and previous work experience;
- data on changed work capacity (if required by the job in question);
- date of birth (if required for the job in question);
- salary requirements, interview notes, CV, evaluation prepared by us.

Cooperating partners

When selecting our own employees, personality and competency tests and assessments may be carried out in some cases. The tests and assessments are conducted by our partner, and we receive the evaluation based on the test and assessment. Our current partner is SHL Hungary Kft. (2040 Budaörs, Kossuth Lajos utca 20.).

Our data processors

We may engage data processors for data storage and information technology services related to data carriers, as well as for other data management operations. Data processors act in accordance with the law and our instructions when carrying out data processing operations. The data processors we use and their tasks:

DATA PROCESSOR	ACTIVITIES
HR-FACE Számviteli és Humán Szolgáltató Kft. (HR-FACE Accounting and Human Resources Services Llc.), registered office: 8000 Székesfehérvár, Seregélyesi út 113.	Activity: Payroll accounting, labor administration
Pannon-Work Zrt. (Pannon-Work Co. Ltd.; registered office: 1114 Budapest, Bartók Béla út 15/D.	Activity: ATS development, operation
Stern Com Kft. (Stern Com Llc.), registered office: 1118 Budapest, Dayka Gábor utca 3.	Marketing activities, LinkedIn, Facebook, other social media platforms management
Bearmentor Kft. (Bearmentor Llc.), registered office: 9027 Győr, Budai u. 5/a.	Activities: occupational health and safety-related professional activities

7. DATA SECURITY

In order to maintain the security and confidentiality of the personal data we process and to prevent the destruction, unauthorized use, or alteration of personal data, we apply the following information security and other data security and organizational measures in particular. In addition, we keep abreast of technological developments, the available technical, technological and organisational solutions, and we apply solutions that are appropriate for the level of protection justified by our data management operations.

We manage personal data related to recruitment both *on paper* and *electronically*.

- Documents containing personal data stored *on paper* are kept in lockable cabinets to protect them from unauthorized access.
- Personal data provided by *e-mail* or other electronic means may only be accessed and managed by our employees who have the appropriate access rights. We ensure that data is backed up to maintain its authenticity and integrity, and that the original data can be restored in the event of any potential destruction or alteration.

8. YOUR RIGHTS

- 1./ Withdrawal of the consent
- 2./ Right to receive information / Right of access
- 3./ Right to rectification
- 4./ Right of erasure (“the right to be forgotten”)
- 5./ Right to object to data processing based on legitimate interests
- 6./ Right to restriction of data management
- 7./ Data portability

Withdrawal of the consent You have the right to withdraw your consent at any time without giving any reason. After withdrawal of consent, we will no longer manage the personal data of the person concerned. Withdrawal of consent does not affect the lawfulness of the prior data management.

Request for information / Right of access You may request information at any time about whether we are currently managing your personal data. You have the right to request clear, transparent, and understandable information about how we process your personal data and what your rights are in relation to this.

This information note on data management also serves this purpose. Upon your request, we will provide you with information about the data we manage about you, the purpose of data management, its legal basis, duration, as well as who receives or has received your data and for what purpose, what rights you have as a data subject, and if we did not receive your data from you, the source of the data. Along with the information, we will also provide you with a copy of your personal data managed by us upon request. The first copy is free of charge, but we may charge a reasonable fee for each additional copy. The amount will be communicated to you in advance.

Right to rectify or supplement data If you notice that any of your personal data is incorrect, inaccurate, or incomplete, or if your personal data has changed in the meantime (e.g., you have changed your name or obtained a new qualification), please provide us with the correct, changed, or additional data so that we can make the necessary corrections or additions and ensure that the data is up to date.

Right of erasure of your personal data (the “right to be forgotten”) You may notify us at any time, without justification, that you are no longer interested in the job opportunity or that you do not wish to receive job offers in the future (withdrawal of consent). After that, we will delete your personal data unless there are other legal grounds for retaining it. Withdrawal of consent does not affect the lawfulness of the prior data management. Please note that we may refuse to delete your personal data, in particular if the data is necessary or may be necessary for the fulfillment of our legal obligations or for the enforcement of claims.

Objection With regard to data management based on legitimate interests, you may object to our data management if you consider that it is detrimental to you. In the event of an objection, we will delete your personal data unless there are compelling legitimate grounds for processing that override your interests, rights, and freedoms, or that are related to the establishment, exercise, or defense of legal claims.

Restriction of data management You may request that we mark your personal data for restriction of future management if one of the following applies: a) you contest the accuracy of the personal data, in which case the restriction will apply for a period enabling us to verify the accuracy of the personal data; b) the data management is unlawful and you oppose the erasure of the data and request the restriction of its use instead; c) we no longer need the personal data for the original purpose of data management, but you require it for the establishment, exercise, or defense of legal claims; d) you have objected to the data management and it requires time to verify whether there are other grounds that prevent erasure.

During the restriction period, we will only store the data and will not perform any other data management operations, unless you consent to further operations or they are necessary to protect your own or third-party rights or in the public interest. In case of restriction of data management, you will be informed in advance of any release of the restriction.

Right to data portability If we manage your personal data electronically, you may request that we transfer the personal data you have provided to us to you or another person designated by you in a commonly used and easily usable electronic format.

9. HOW TO ENFORCE YOUR RIGHTS

CONTACTING OUR COMPANY

When exercising your rights as described above, please submit your request in writing, if possible, in person at any of our offices or send it to us using one of the contact details listed in section 1. In the letter, please include your identification details and postal address, too. If we have any doubt about your identity or if the information you provide is not sufficient to identify you, we are authorized to ask you for additional identification information.

Your request will be fulfilled within 1 month. In case of need, we are authorized to extend this period by further 2 months, and we will send you a reasoned explanation thereof.

Well-founded requests will be fulfilled free of charge. However, if the request is manifestly unfounded or excessive, in particular because of its repetitive nature, we are authorized to charge a reasonable fee or even refuse to act on the basis of the request.

We will inform all those to whom we have disclosed the data concerned of the rectification, erasure or restriction of the data, unless this proves impossible or involves a disproportionate effort. At your request, we will inform you of the recipients to whom we have provided the information described above. Please note that you may also contact the data protection officer, whose contact details can be found in section 1 of this information note.

TURNING TO A COURT

Please note that you are also authorized to pursue your claim in court. The tribunal courts have jurisdiction to hear the case. You can also bring the case before the tribunal courts where we are based or where you live or reside.

CONTACTING THE AUTHORITY FOR DATA PROTECTION, MAKING A COMPLAINT

In the event of unlawful data management, you are also authorized to turn to the National Authority for Data Protection and Freedom of Information (NAIH) and initiate its proceedings.

Website: <http://naih.hu>

Address: 1055 Budapest, Falk Miksa utca 9-11.,

Postal address: H-1365 Budapest, P. O. Box: 9.

Budapest, 26.01.2024

HUNAM Personnel Solutions Kft.
Data Controller