

## PRIVACY POLICY OF JOB SEEKERS

### I. GENERAL PROVISIONS

#### 1. Data Controller's data

- Registered office: 2615 Csóvár, Mikszáth utca 3.
- Registration number: 13-09-190013
- Tax number: 13424907-2-13
- Representative name: Borics Norbert Executive Director
- E-mail address: info@adapt.hu
- Phone number: +36 57 401 011
- Data Protection Officer: Dr. Gábor Keszey, available by post at the Data Controller's headquarters, by e-mail at info@adapt.hu

Name: ADAPT Temporary Employment Agency and Service Providing Ltd.

#### 2. Specific processing operations covered by this notice

- Data processing in relation to applications for job vacancies
- Processing of data provided on social networking sites when applying for a job advertisement
- Processing in relation to temporary agency work (name check or temporary agency relationship)
- Transmission of data related to recruitment agencies

### 3. Rights of persons concerned

Persons concerned may exercise their rights (right of access, right of rectification, right to erasure and "right to be forgotten", right to blocking/restriction of data, right to object, right to data portability, right to withdraw consent) by sending a statement to the e-mail address [info@adapt.hu](mailto:info@adapt.hu) or to other contact details of the Data Controller, and by lodging a complaint with the authority (for the contact details see NAIH, [www.naih.hu](http://www.naih.hu)), and, if they consider that their rights have been violated, they may apply to the competent court in their place of residence. The Data Controller draws the attention of the persons concerned to the fact that the exercise of their rights may be subject to conditions and limitations in relation to the processing of a data file, which the Data Controller is obliged to examine in the exercise of the person concerned's rights. In the event that a right cannot be exercised by the person concerned in relation to a given processing operation, the Data Controller shall inform the person concerned in writing (including by electronic means) of the factual and/or legal grounds excluding/limiting the exercise of the right and shall keep a record thereof.

Detailed information on the rights of the person concerned is set out in Part V of this notice.

### 4. Data security

The Data Controller has established a framework of internal policies, procedures and training on data protection, confidentiality and security and regularly reviews the measures taken to ensure the security of the data available. Further rules are set out in Part VI of this notice.

## II. INFORMATION ON DATA PROCESSING IN THE CONTEXT OF AN APPLICATION FOR A JOB VACANCY

### Introduction

The data controller hereby informs applicants for job advertisements related to recruitment and temporary employment services that, in view of the fact that the applicant is aware that ADAPT Temporary Employment Agency and Service Providing Ltd. is engaged in recruitment and temporary employment services and that the published job advertisement falls into this category, the application for the given position is compatible with the purpose of finding and offering the applicant a suitable job opportunity or position, since the applicant's basic aim is to find employment.

Based on the above - if the applicant specifically agrees to this - the ADAPT Temporary Employment Agency and Service Providing Ltd. is entitled to offer the applicant other job offers, thereby fulfilling the applicant's basic purpose, i.e. employment.

The legal basis for the basic purpose of the person concerned is voluntary consent (Article 6(1)(a) of 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 Regulation (EC) No 95/46/EC (hereinafter "GDPR")), therefore the legal basis for the basic and original purpose, the request for other job offers considered appropriate for the person concerned, is also the specific consent of the person concerned.

Accordingly, the ADAPT Temporary Employment Agency and Service Providing Ltd. will, in accordance with the basic purpose of the applicant, process the applicant's data even after the position has been closed, if the applicant has given his/her specific consent during the application or selection procedure, until the withdrawal of the applicant's consent (request for deletion), or, failing these, for a maximum of 2 years.

#### 1. PROCESSING OF DATA PROVIDED DURING THE APPLICATION PROCESS

Summary table on the processing of data provided during the application process
<b>Purpose:</b> employment, which is embodied in the application for a job advertisement published by the Data Controller in the field of temporary employment and placement services and in the application for a compatible job offer to the person concerned

<b>People concerned:</b> natural persons who apply for advertising via a website			
<b>Data</b>	<b>Purpose</b>	<b>Legal base</b>	<b>Storage period</b>
Name	identification, addressing	Prior voluntary consent of the person concerned (Article 6(1)(a) GDPR)	Until the withdrawal of the consent of the person concerned (request for deletion), in the case of specific consent up to 2 years or until the withdrawal of the consent
E-mail address	contacting, identifying		
Phone number			
Qualification	for applications		
CV details	for applications		
indication of consent, time and date	subsequent evidence	Legitimate interest of the Data Controller (Article 6(1)(f) GDPR), which will be reflected in the subsequent evidence	

### 1.1. Who are the people concerned?

The persons concerned are natural persons who apply for advertising through a website.

1.2. The main purpose of the processing of data is employment, which is embodied in the application for a job advertisement published by the Data Controller in the field of temporary employment and recruitment and the application for a compatible job offer to the person concerned.

### 1.3 How is the data processed?

The activities and processes involved in the processing are typically, but not exclusively, the following:

- a. The person concerned applies for a job advertisement on the website.
- b. The data is transferred to the Data Controller via a secure channel, stored in an electronic record system.
- c. The process continues with other data processing (contact, name check, data transfer).

1.4.

Directly from the person concerned.

1.5.

How the data is processed: electronically, manually.

1.6 Is there any communication (access, transfer, transmission) of data to third parties?

A data processor may access data as follows:

Company name	Head office	Location of service provision	Service
PC Support Kft.	5100 Jászberény, Páfrány u. 41.	IT system	sw and hw installation, maintenance, repair

## 2. PROCESSING OF DATA PROVIDED ON SOCIAL NETWORKING SITES, PARTICULARLY ON FACEBOOK

Summary table on data processing of data provided on social networking sites					
Purpose	Legal base	Persons concerned	Data category	Time period	Source

<p>sharing and publishing the services of the Data Controller (temporary employment, recruitment) on social networking sites. The social networking site allows the person concerned to be informed about the latest job advertisements</p>	<p>Voluntary consent (Article 6 (1) (a) GDPR)</p>	<p>Natural persons who voluntarily follow, share, like, subscribe to advertising or otherwise interact with the Controller's social networking sites, in particular facebook.com or content on facebook.com</p>	<p>name of the person concerned (public) e-mail address of the person concerned Other personal data of the person concerned given when applying for a job advertisement (e.g. data on previous jobs) message sent by the person concerned via the social networking site, rating by the person concerned, or other operation</p>	<p>Until the limitation period for asserting a legal claim against the Partner (until deletion at the request of the person concerned, if deletion is not prevented, or until objection at the request of the person concerned, if deletion is not prevented)</p>	<p>Persons concerned</p>
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The data controller can be reached on <https://www.facebook.com/adapt.hu>.



In connection with the processing of data on facebook.com, shared data processing will be carried out as follows:

- Data Controller designated for contact: ADAPT Employment Agency and Service Providing Ltd. (registered office: 2615 Csóvár, Mikszáth utca 3., company registration number: 13-09-190013, tax number: 13424907-2-13, representative name: Norbert Borics Executive Director, e-mail address: info@adapt.hu, phone number: +36 57 401 011, name and contact details of the Data Protection Officer: Dr. Gábor Keszey, available by post at the Data Controller's headquarters, by e-mail to info@adapt.hu)

- Additional Data Controller in relation to Facebook.com and Facebook-related pages:

Facebook Ireland Limited

4 Grand Canal Square

Grand Canal Harbour

Dublin 2 Ireland ("Facebook" or "FB")

2.1. What are the fields and purposes of the data processed by the Data Controller (ADAPT Temporary Employment Agency and Service Provider Ltd.) in connection with Facebook and Facebook-related pages?

The fields and purposes of the data processed:

name of the person concerned (public)

identification, data made accessible to the Data Controller during the operation of FB page

e-mail address of the person concerned

Other personal data of the person concerned application, selection  
given when applying for a job advertisement  
(e.g. data on previous jobs)

message sent by the person concerned through contact, basis of response  
social networking site

rating by the person concerned, quality improvement or other operation  
or other operation

The Data Controller only communicates with the persons concerned through the Community Site and therefore the purpose of the data processing becomes relevant when the person concerned contacts the Data Controller through the Community Site.

## 2.2. What data is processed by Facebook?

Facebook processes the data of the page analytics.

You can read Facebook's privacy policy on Page analytics data here: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)

## 2.3. What is the legal basis for the processing of the data in relation to the Data Controller designated to act as the contact?

The use of social networking sites, including in particular the Facebook page, the contact, communication and other operations (interactions) permitted by the social networking site, through the use of the social networking site, is based on the prior and voluntary consent of the person concerned (Article 6(1)(a) GDPR).

Explanation.

For example, the person concerned can subscribe to a news feed or story posted on the Facebook wall of the Controller's Facebook page by clicking on the "like" link on the page, apply for a job advertisement and interact with the Controller and the posts on the page, whereby both the Controller and Facebook, which is the designated contact, process his/her data.

#### 2.4. Who are the persons concerned?

The persons concerned are: natural persons who voluntarily follow, share, like, subscribe to advertising or otherwise interact with the social networking sites of the Data Controller, in particular the facebook.com social networking site or the content displayed on it.

#### 2.5.

The main purpose of the presence on social portals and the processing of the data related to it is the sharing and publication of the services of the Data Controller (recruitment, placement) on social portals. The social networking site allows the person concerned to be informed about the latest job vacancies.

#### 2.6. How long does the data processing last?

Duration of data processing: until the limitation period for asserting a legal claim against the Partner (until deletion at the request of the person concerned, if deletion is not prevented, or until objection at the request of the person concerned, if deletion is not prevented).

## 2.7. Where is the data from?

Data source: directly from the person concerned.

## 2.8 Is there any disclosure (access, transfer, transmission) of data to third parties?

Data disclosure:

- a. to a participant in the shared data management by the person concerned (using facebook)
- b. To a partner in connection with a name check
- c. To a partner in connection with recruitment

## 2.9. Other provisions

The Data Controller or Facebook may connect the Community Site to other Community Sites in accordance with the rules of the relevant Community Portal, and therefore posting on a particular Site shall be understood to include posting on other Community Portals connected to such Site.

Persons concerned may obtain information about the processing of their data on the relevant social networking site by contacting the relevant social networking site, and accordingly, information about the processing of their data on the Facebook page can be obtained by contacting [www.facebook.com](http://www.facebook.com).

### III. INFORMATION ON DATA MANAGEMENT FOR TEMPORARY AGENCY JOB APPLICANTS AND TEMPORARY AGENCY WORKERS

#### Introduction

The Lender ADAPT Temporary Employment Agency and Service Providing Ltd. allows its Partners, as Borrowers, to borrow workforce from it in accordance with the relevant legislation.

In the context of the provision of temporary employment services, ADAPT Temporary Employment Agency and Service Providing Ltd. shall, taking into account the criteria set by the Partner, advertise a job offer, carry out a selection process, present the most suitable candidates to the Partner and, if the selection is positive, conclude a contract with the person concerned, who shall then work in the place and manner determined by the Partner, with the right to exercise the rights of an employer, as provided for in the agreement on temporary employment services and in Act I of 2012 (Labour Code) and other legislation on employment relationships.

For the purposes of selecting, hiring and lending out the workforce, the Lender, i.e. ADAPT Temporary Work Agency and Service Providing Ltd., shall transmit the most necessary data of the person concerned to its Borrower Partner.

Data of the Lender, the Data Controller who provides this information:

ADAPT Temporary Employment Agency and Service Providing Ltd.

- Registered office: 2615 Csővár, Mikszáth utca 3.

- Registration number: 13-09-190013

- Tax number: 13424907-2-13

- Phone number: +36 57 401 011

- E-mail address: [info@adapt.hu](mailto:info@adapt.hu)

-Representative: Borics Norbert Executive Director

- name and contact details of the data protection contact person: dr. Gábor Keszey, available by post at the Data Controller's headquarters, by e-mail to [info@adapt.hu](mailto:info@adapt.hu)

Due to the continuous changes in the other data controllers involved in the temporary work agency business, it is disproportionately difficult to list all the Borrowers in this information, but ADAPT Temporary Work Agency and Service Providing Ltd. informs the persons concerned separately about the Borrower recipients.

This Part II contains information on the following data processing:

- Name check

- Data processing in the context of a temporary employment relationship

Summary table of data processing related to Namecheck			
<b>Purpose:</b> to facilitate an efficient, quick selection by having the Partner check whether the applicants are already known to him/her from a previous / other lender / recruiter			
<b>People concerned:</b> Candidates applying for a temporary work placement advertisement.			
Data	Purpose	Legal base	Storage period
name	identification	Legitimate interest of the controller and the	Until the limitation period
place of birth			

date of birth		third party, the borrower (Article 6(1) (f) GDPR)	for asserting a legal claim against the Partner (until deletion at the request of the person concerned, if deletion is not prevented, or until objection at the request of the person concerned, if deletion is not prevented)
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The Data Controller performs a so-called name check, during which it transmits to the Partner the minimum data necessary to identify the applicant for a temporary employment advertisement (name, place of birth, date) in order to determine whether the Partner already knows the applicant, e.g. whether he/she has already applied for a job, or whether a former colleague or other lender has already offered the applicant or not, in order to continue or interrupt the selection process in relation to the applicant based on the feedback from the Partner.

## 1.1

What are the categories, purposes, legal basis and storage period of the data processed?

Data	Purpose	Legal base	Storage period
name	identification	Legitimate interest of the controller and the third party, the borrower (Article 6(1) (f) GDPR)	Until the limitation period for asserting a legal claim against the Partner (until deletion at the request of the person concerned, if deletion is not prevented, or until objection at the request of the person concerned, if deletion is not prevented)
place of birth			
date of birth			

## 1.2. Who are the persons concerned?

Persons concerned: applicants for temporary employment advertising.



### 1.3 What is the main purpose of the processing?

The main purpose of the processing of data is to facilitate efficient, rapid selection by the Partner checking whether the applicants are known to him/her from previous / other recruitment agencies / intermediaries.

### 1.4 How is the data processed?

The activities and processes involved in data processing are typically, but not exclusively, the following:

- The person concerned applies for a job advertisement related to temporary employment.
- The Data Controller sends the name, date and place of birth to the Partner via a secure channel.
- Partner sends feedback on whether the selection process can proceed with regard to the applicant.

### 1.5. **Where did the data come from?**

Directly from the person concerned.

### 1.6. **The way the data is processed:** electronically, manually.

### 1.7 **Is there any communication (access, transfer, transmission) of data to third parties?**

Yes, to the Partner, who will be identified in advance to the persons concerned.

### 1.8 **Other**

Data marked with an \* are indicated by the Data Controller as necessary for the processing of the data.

## 2. INFORMATION ON DATA PROCESSING IN THE CONTEXT OF TEMPORARY AGENCY WORK

### 1.

Summary table on the processing of personal data of temporary agency workers	
Purpose	ensuring the conditions for temporary work and maintaining contacts.
Legal base	the consent of the person concerned when applying for a job, in the case of selection, the performance of an agreement with the person concerned when concluding an employment contract, the notification of employment-related matters to the authorities, the performance of a legal obligation in the course of accounting, and in other cases the legitimate interest of the Data Controller
P e r s o n s	natural persons employed as temporary agency workers
Data category	see details in the privacy statement

Time period	for 3 years to enforce a labour law claim 5 years for civil law claims pursuant to § 99/A of Act LXXXI of 1997 for five years after the insured person reaches the retirement age, an additional period is prescribed by law for other purposes, during which period
Mode	electronic and/or paper-based, manual
Source	Persons concerned, Partner

In view of the fact that the purpose of the processing activity and the method of processing as set out in this Notice are jointly determined, the Lender and the Borrower (Partner) shall be considered as joint controllers pursuant to Article 26 of Section 1 of Chapter IV of the GDPR.

## 2.1. What is the scope of the data processed?

Scope of the data processed:

personal identification data (name, surname, first name, name at birth, title, place of birth, date of birth, mother's name, nationality), contact details (telephone number, permanent address, residence), social security number, tax identification number, identity card number, gender, marital status, number of children, place and date of birth, tax identification number, bank account number, type of driving licence, data on studies, education (data on education, data on education, training, qualifications, language skills), documents required for the job (medical record book, copies of other documents required by law or by the job), data on employment (date of employment, job held, working hours, place of work, date of termination of employment, conditions of termination of employment), medical certificate, data on payroll (data on working hours, dates of employment, dates of employment, conditions of termination of employment), data on medical fitness, data on payroll; absence data, information; employee benefit data; data relating to employment, insurance (dates, characteristics, classification data, etc.) ); personal data relating to employment-related tax benefits.

## 2.2. What is the legal basis for processing?

The legal basis for the processing of data in the context of temporary agency work

- The person's consent during the application and selection process (Article 6(1)(a) GDPR),
- in the case of an employment contract with a person concerned, the performance of the agreement with the person concerned (Article 6(1)(b) GDPR)
- when reporting employment-related matters to the authorities, to comply with a legal obligation in the settlement of accounts (Article 6(1)(c) GDPR),
- the performance of a legal obligation in the exercise of the employer's rights (Article 6(1)(c) GDPR); or
- in other cases, to pursue his or her legitimate interests (Article 6(1)(f) GDPR).

The background of temporary employment is provided by the Labour Code and the Government Decree 118/2001 (VI. 30.) on the registration and conditions of the activity of temporary employment and private employment agencies, as well as other related legislation.

## 2.3. Who are the persons concerned?

The persons concerned are natural persons employed in the framework of temporary agency work.

## 2.4.

The purpose of the processing is to ensure the conditions of temporary employment and to maintain contact. The purpose is also to exercise the rights and fulfil the obligations arising from the employment relationship with the Data Controller in connection with the establishment, performance and termination of the employment relationship with the Data Controller, in accordance with the provisions of the employment contract and the provisions of the Labour Code, in particular with regard to the provisions of the Labour Code, the Labour Code and the Labour Code. "5/A. Data management".

## 2.5. How long does the processing last?

Duration of processing: Personal data are deleted at the time of the cessation of the purpose of processing or at the request of the person concerned, except for data that the Data Controller is legally obliged to keep for the period specified in the legislation imposing the mandatory processing, such as

- The Data Controller shall retain personal data processed in the course of the establishment, performance and termination of the employment relationship with the person concerned for the purpose of enforcing an employment claim until the expiry of the statute of limitations for the employment claim arising from the employment relationship, i.e. 3 years from the termination of the employment relationship pursuant to Section 286 (1) of the Labour Code,
- for the enforcement of civil law claims within the period of the Civil Code. 6:22 § (1) for 5 years,
- the Data Controller is obliged to keep employment records containing data on the length of service or earnings and income taken into account in the determination of pension benefits in connection with the insurance relationship of the person concerned pursuant to Section 99/A of Act LXXXI of 1997 for five years after the insured (person concerned), former insured person reaches the retirement age,
- or, where the legislation provides for an additional period for other purposes, during that period.

## 2.6. How is the data processed?

The method of data processing: electronic, manual.

## 2.7. Source of data: directly from the person concerned, or from the Commissioning Partner.

## 2.8 Is there any disclosure of data to third parties?

Data communication to a data processor:

Company name	Headquarters	Location of service provision	Service
Maxoft Kereskedelmi és Konzultációs Kft	1092 Budapest, Ráday utca 32. I/8.	Vizuál Bér	Provision of payroll software and support
PC Support Kft.	5100 Jászberény, Páfrány u. 41.	IT system	sw and hw installation, maintenance and repair

translator	location of the translator	Data controller's headquarters, branches	interpretation and translation tasks
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The Data Controller transmits data to the service provider company for the purpose of the occupational aptitude test required by Act I of 2012 (Labour Act) (name, job title, social security number, address, feor)

If a medical fitness test is required for a new temporary employee or an existing temporary employee, the Data Controller will transfer the following data to the company doctor for the purpose of providing occupational health services pursuant to and on the basis of the authorisation under Act XCIII of 1993 on Occupational Health and Safety.

If the worker is accommodated in a workplace accommodation, the data (name, place of birth and/or address) are transmitted to the accommodation for identification and eligibility verification purposes

If the employee does not have a bank account number in Hungary, data is transmitted to the bank for the purpose of opening a bank account (data transmitted: name, mother's name, place and date of birth, nationality, address, place of residence, telephone number, e-mail address)

If the employee gives his/her consent by signing a declaration (Annex 2), his/her personal data may be transmitted to the bank for the purpose of opening a bank account. A copy of his/her personal document may only be transmitted if a contract has been concluded between the bank and the Data Controller, under which the Data Controller is responsible for this.

IV. INFORMATION NOTICE ON THE TRANSFER OF DATA OF APPLICANTS' PERSONAL PERSONS CONCERNED IN THE COURSE OF RECRUITMENT BASED ON THE LEGITIMATE INTEREST OF THE CONTROLLER

Given that one of the main objectives of the relevant legislation is to ensure transparency, the Data Controller wishes to inform you in this document about the transfer of your personal data.

Summary table of data processing in relation to the transfer of data of applicants' personal information based on the legitimate interest of the controller in the context of recruitment			
<b>Purpose:</b> to place the labour force, to match the candidates with the partners looking for a workforce as quickly as possible			
<b>Persons concerned:</b> persons applying (registering) for an advertised job advertisement or in the Data Controller's database (database), who participate in recruitment.			
<b>Data</b>	<b>Purpose</b>	<b>Legal base</b>	<b>Storage period</b>
first stage: name	identification	Legitimate interest of the controller (Article 6(1)(f) GDPR)	Until the limitation period for asserting a
first stage: place and date of birth			



<p>in a second stage: data provided by the person concerned to the Data Controller during the application process</p>	<p>meeting the requirements of the vacancy notice, launching the selection process</p>	<p>legal claim against the Partner (until deletion at the request of the person concerned, if deletion is not prevented, or until objection at the request of the person concerned, if deletion is not prevented)</p>
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1. What is the scope of the data processed?

The scope of the data transferred is the same as the scope of the data provided by the applicant when applying to the Data Controller concerned, as follows:

The data transfer is a two-step process:

In the first step, the following data are transmitted to the Partner:

- Name and date and place of birth.

If the person concerned can be identified by the Partner, already exists in its database, i.e. has already been placed by another intermediary or is a former or current employee of the Partner, no further data will be transmitted by the Data Controller.

If the person concerned cannot be identified by the Partner (i.e. does not exist in its database, e.g. because the person concerned has not been referred to it by another intermediary or is not a current or former employee of the Partner), the Data Controller shall, in the second step, transmit the following to the Partner

- data provided by the person concerned to the Data Controller during the application process.

The two-step transfer also complies with the principles of necessity and proportionality and the requirement of data security.

2. What is the legal basis for processing?

The legal basis for the processing is Article 6(1)(f) of the GDPR, the legitimate interest of the Controller.

The Data Controller's legitimate interest is to provide the person applying for a job advertisement or a data file with a job opportunity as quickly as possible, in which the Partner providing the job opportunity, having knowledge of the personal data provided by the person concerned to the Data Controller, is open to the possibility of inviting the person concerned to a job interview and can take a decision on this.

In the modern world of work, speed is a key factor in finding a job, and therefore the transmission of data by consent would disproportionately prolong the process, and the

number and constantly changing composition of the Data Controller's partners would make it disproportionately difficult to collect individual consents from the applicant in advance.

It is in the business interest of the Data Controller to provide the candidate's data concerned to the partner providing the job opportunity as quickly as possible, because the intermediary who has provided the suitable candidate soonest will win the position and thus the remuneration under the relevant contract, on the basis of competition. The Data Controller has demonstrated its legitimate interest by means of an interest test, which is available at the Data Controller's headquarters and which the Data Controller will send to the person concerned upon request.

### 3. Who are the persons concerned?

The persons concerned are: persons applying (registering) for an advertised job vacancy or for a job advertisement in the database of the Data Controller, who are involved in recruitment.

### 4. What is the purpose of the processing?

The purpose of the processing is the placement of personnel, the placement of applicants to the Partners seeking employment as quickly as possible.

### 5. How is the data processed?

The typical activities and processes involved are:

- a. The person concerned applies (registers) for a job advertisement or for a database (database) of the Data Controller.

- b. The person concerned has the possibility to designate the Partners with regard to whom he/she wishes to prohibit the transfer of his/her data.
- c. The person concerned may also indicate in writing to the Data Controller if he/she objects to the processing of data processed in the context of job placement on the basis of legitimate interest and only with his/her consent may his/her data be transferred to Partners.
- d. The Data Controller will verify the person concerned's data and objections and will transfer (or not transfer) the person concerned's data to its Partners accordingly (if necessary, subject to consent), using the two-step transfer procedure already mentioned above, in compliance with the requirement of data security.
- e. If a Partner is interested in the candidate person concerned and proposes to interview him/her, the Data Controller will contact the person concerned for this purpose.

## 6. How long does the processing last?

Duration of processing:

- a. Until the limitation period for asserting a legal claim against the partner (in order to enable the Data Controller to prove whether the Data Controller mediated the person concerned in the event of a dispute).
- b. until deletion at the request of the person concerned, if the deletion is not prevented by the purpose indicated in point a. or if the deletion does not prejudice the rights or interests of the person concerned or of others and there is no legal/ factual obstacle to the deletion
- c. until objection at the request of the person concerned, if the erasure is not prevented by the purpose stated in point (a) or if the erasure does not adversely affect the rights or interests of the person concerned or of others and there is no legal/ factual obstacle to the erasure.

## 7. How is the data processed?

The processing is typically carried out electronically, but may also be carried out manually.

8. Where did the data come from?

Data source: directly from the person concerned.

9. Is there any disclosure of data to third parties?

Yes, there is, this is the basis of the communication. However, any Partner as recipient of a data transfer will be disproportionately difficult for the Data Controller to identify in advance to the person concerned due to their number and variability.

Therefore, in compliance with Article 14(3)(c) of the GDPR, the Data Controller will inform the person concerned by e-mail after the first data transfer about the transfer and its recipient, the terms of this notice and the possibility to object further.

## V. THE RIGHTS OF THE PERSON CONCERNED

The following table sets out the relationship between the person concerned's rights and the legal basis, so that it is clear to the person concerned what rights he or she can exercise under the legal basis used.

	The right to prior information	Right of access	Right of rectification	Right of cancellation	Restriction	Data portability	Objecti on	Withdra wal of consent
Contribu tion	✓	✓	✓	✓	✓	✓	✗	✓
Agreeme nt	✓	✓	✓	✓	✓	✓	✗	✗
Legal obligatio n	✓	✓	✓	✗	✓	✗	✗	✗
Vital interest	✓	✓	✓	✓	✓	✗	✗	✗
Public task, public right	✓	✓	✓	✗	✓	✗	✓	✗
Legitimat e interest	✓	✓	✓	✓	✓	✗	✓	✗

### 1. Right of access (Article 15 GDPR)

The person concerned has the right to obtain from the Controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and information about the circumstances of the processing. Where personal data are transferred to a third country or to an international organisation, the person concerned shall have the right to be informed of the appropriate safeguards for the transfer in accordance with Article 46. The Controller shall provide the person concerned with a copy of the personal data which are the subject of the processing, if the person concerned so requests.

## 2. Right to withdraw consent (Article 7 GDPR)

The person concerned has the right to withdraw his/her consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

## 3. Right to rectification (Article 16 GDPR)

The person concerned shall have the right to obtain, at his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her.

## 4. Right to object (Article 21 GDPR)

The person concerned has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of Article 6(1) (e) or (f) of the GDPR.

In such a case, the Controller may no longer process the personal data, unless it can demonstrate legitimate grounds for the processing which override the interests, rights and freedoms of the person concerned.

## 5. Right to restriction of processing (Article 18 GDPR)

The person concerned shall have the right to obtain, at his or her request, the restriction of processing by the Controller if any of the conditions set out in the GDPR are met, in which case the Controller shall not carry out any operation on the data other than storage.

Where the person concerned has objected to the processing; in this case, the restriction shall apply for a period of time until it is established whether the legitimate grounds of the Controller prevail over the legitimate grounds of the person concerned.

#### 6. Right to erasure (right to be forgotten) (Article 17 GDPR)

The person concerned shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay where the processing has no purpose, the person concerned has withdrawn his or her consent and there is no other legal ground for the processing, there is no overriding legitimate ground for the processing in the event of an objection, the data have been unlawfully processed or the data must be erased in order to comply with a legal obligation. Where the controller has disclosed the personal data and is under an obligation to erase it, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that the person concerned has requested the deletion of the links to or copies or replicas of the personal data in question.

#### 7. Right to data portability (Article 20 GDPR)

The person concerned has the right to receive the personal data concerning him or her which he or she has provided to the controller in a structured, commonly used, machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which he or she has provided the personal data, where legal conditions (automated processing and legal basis for consent or agreement) are met.

8.



The Data Controller draws the attention of the persons concerned to the fact that they may request information, exercise their right of access and exercise their other rights by sending a statement to the Data Controller by post

(2615 Csóvár, Mikszáth utca 3.) or by e-mail (info@adapt.hu). The Data Controller will examine and reply to the declaration as soon as possible after receipt, but no later than 1 month, and will take the necessary steps.

#### 9. Contact details of the authority in case of a complaint (Article 77 GDPR):

Nemzeti Adatvédelmi és Információszabadság Hatóság

Address: 1055 Budapest, Falk Miksa utca 9-11

Postal address: 1363 Budapest, PO Box 9.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Website: <http://www.naih.hu>

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

For more information about your rights and details of how to complain to the Authority, please visit <http://naih.hu/panaszuegyintezes-rendje.html>.

#### 10.

In the event of a breach of your rights, you may also bring an action before the courts of the place where you reside, including a claim for damages.

You can find the competent court in your place of residence at the following link: <https://birosag.hu/birosag-kereso>

## VI. DATA SECURITY

### 1. How does the Data Controller ensure data protection?

The Data Controller shall ensure, in particular, in the context of its IT security responsibilities:

- a. denying unauthorised persons access to the means used for data processing (hereinafter referred to as the "data processing system"),
- b. preventing the unauthorised reading, copying, modification or removal of data media,
- c. preventing the unauthorised input of personal data into the data management system and the unauthorised access to, modification or deletion of personal data stored in the data management system,
- d. preventing the use of the processing systems by unauthorised persons by means of data transmission equipment,
- e. ensuring that persons authorised to use the processing system have access only to the personal data specified in the access authorisation,
- f. that it is possible to verify and establish to which recipients the personal data have been or may be transmitted or made available or made available by means of a data transmission installation
- g. that it is possible to verify and establish a posteriori which personal data have been input into the system by whom and at what time
- h. on the prevention of unauthorised access to, copying, modification or deletion of personal data during their transmission or during the transport of the storage medium
- i. ensure that the data management system can be restored in the event of a malfunction.

j. that the data management system is operational, that any errors in its operation are reported and that the personal data stored cannot be altered even if the system is not functioning properly.

2. How does Facebook ensure data protection?

See [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum) for more information in the Annex.

3. Is there any automated decision-making, profiling?

Automated decision making, profiling: no automated decision making or profiling is carried out by the Data Controller appointed to handle the data. However, the Data Controller draws attention to the fact that the Data Controller operating the relevant social networking site may carry out profiling or other automated processing for its own purposes and in its own interest, but in this case the Data Controller will be the operator of the social networking site.