

PRIVACY POLICY FOR JOB APPLICATIONS

This privacy policy contains the **Kastélyszálló Kft.** (registered office: 1033 Budapest, Polgár u. 8-10.; company registration number: 01-09-690792; "**Company**") rules governing data processing in connection with its job advertisement and the applications submitted for it.

In connection with the processing of your CV by the Company, we inform you as set out in Article 13 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 Directive 95/46/EC (General Data Protection Regulation) ("GDPR"), as set out in this notice, or if we have not received your CV directly from you, but from a recruitment agency ("headhunter"), then according to Article 14.

When preparing this information, the Company took into account the GDPR and the information provided by the National Authority for Data Protection and Freedom of Information of 28 October 2016 on the basic requirements for data processing in the workplace, as well as the opinion no. 2/2017 of the Data Protection Working Party pursuant to Article 29 of the EU on data processing carried out in the framework of an employment relationship.

1. Legal basis for data processing and scope of data processed:

Pursuant to Art. 6 para. 1 lit. a) GDPR, the processing of personal data is lawful if and to the extent that you consent to it on the basis of the provisions of this notice. We can only evaluate your application if you give your consent to the processing of the data contained in your CV by the Company in connection with the job advertisement. Scope of processed data: personal data contained in your CV. You can withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing prior to the withdrawal.

2. The data controller shall:

The controller of your personal data contained in your CV (data controller): the Company.

3. Purpose of data processing:

The purpose of data processing is to enable the Company to review your CV and contact you based on your decision in order to fill the vacancy at the Company.

4. Duration of data processing:

If your application is successful and you fill the position advertised by the Company, the Company will no longer process the personal data contained in your CV for the above purposes, it will delete them for this purpose. If your application is not selected by the Company, we will ask for your separate consent for the possible further processing of the personal data contained in your CV in order to contact you for any vacant positions that may become vacant in the future. Consent is optional.

5. Description of the technical and organizational measures used to store the data and ensure the security of the data

Your personal data is stored on the Company's servers located at its branch (2174 Verseg, Fenyőharaszt) in a controlled and closed location.

The Company will take all reasonable technical precautions to ensure the secure and non-access storage of the stored data by third parties.

IT security description of the storage of personal data, technical and organizational measures taken to ensure data security:

The Company ensures the security of personal data by, among other things, recording the operation of its IT system in regulations, providing its IT system with a continuously maintained firewall, protection with anti-virus and spam filtering, protecting its electronic devices with a password, and providing access to certain personal data only to those employees or data processors who need it to perform the given activity.

6. Persons with access to the data, data transfers:

The managing director has access to the personal data.

7. Your rights in relation to data processing (data subject rights):

In connection with the processing of your personal data, you have the following rights:

a) **right of access (Art. 15 GDPR):** You have the right to obtain from the Company information as to whether or not personal data concerning you are being processed, and, if that is the case, access to the personal data and the information contained in this notice.

The Company shall provide you with a copy of the personal data undergoing data processing upon request. For any additional copies requested by you, the Company may charge a reasonable fee based on administrative costs. If you have submitted your request electronically, the information will be provided in a commonly used electronic format, unless you request otherwise.

b) **right to rectification (Art. 16 GDPR):** You have the right to obtain from the Company the rectification of inaccurate personal data concerning you. You also have the right to request that incomplete personal data be completed.

c) **right to erasure (Art. 17 GDPR):** You have the right to obtain from the Company the erasure of personal data concerning you, and the Company is obliged to erase personal data concerning you if one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- if you withdraw your consent;
- you object to the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Company is subject.

d) **right to restriction of processing (Art. 18 GDPR):** You have the right to obtain from the Company restriction of processing if one of the following applies:

- you dispute the accuracy of the personal data, in which case the restriction applies to the period that allows the Company to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- the Company no longer needs the personal data for the purposes of data processing, but you require them for the establishment, exercise or defence of legal claims; or
- You objected to the processing.

e) **right to object (Art. 21 GDPR):** You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data. In this case, the Company will delete the personal data.

f) **the right to information about the above rights (Art. 12 GDPR):** the Company informs you of

the circumstances related to the processing in a concise, transparent, intelligible and clear manner within one month of receipt of your request pursuant to points (a) to (e) above. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The Company will inform you of the extension of the deadline, indicating the reasons for the delay, within one month from the date of receipt of the request.

The information is free of charge.

If your request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Company, taking into account the administrative costs of providing the requested information or communication or taking the action requested: (i) may charge a reasonable fee or (ii) refuse to act on the request.

g) right to lodge a complaint (**Art. 77 GDPR**): You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR. The complaint can be made to the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Erzsébet Szilágyi tree line 22/C.; telephone: +36 1 391 1400; fax: +36 1 391 1410; www.naih.hu; ugyfelszolgalat@naih.hu).

h) right to **go to court (Art. 79 GDPR)**: You have the right to a judicial remedy if you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company shall be brought before the courts of the Member State in which the Company has its place of business. Such proceedings may also be brought before the courts of the Member State in which you have your habitual residence.

i) right to data **portability (Art. 20 GDPR)**: You have the right to receive the personal data concerning you and the personal data provided by you to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company. You also have the right to request from the Company, where technically feasible, the direct transfer of personal data to another controller.

j) **the right to withdraw consent**: You can withdraw your consent to point 1 above at any time, in which case your personal data will no longer be processed.

8. You may request information about the processing of your personal data in the following ways and from a person:

The right to information can be exercised in writing via the following contact details:

by mail: 1033 Budapest, Polgár utca 8-10.

Email: fenyoharaszt@bif.hu

Information may also be provided orally to the data subject at his or her request after verifying his or her identity (phone: +3620/442-21-42). We would like to inform our clients that if our employees have doubts about the identity of the data subject, we may ask for the provision of information necessary to confirm the identity of the data subject.

Budapest, 30 November 2018