

## Data protection notice

### General information

This data protection notice (hereinafter referred to as „**Notice**”) provides clear and evident information on the processing and protection of the personal data of the **Humán Telex Agency Reklám Tanácsadó és Szolgáltató Korlátolt Felelősségű Társaság** (seat: 1036 Budapest, Lajos utca 74-76. V. emelet, company registration number: Cg. 01-09-064170) (hereinafter referred to as „**Controller**” or „**Company**”). The terms used in this Notice are understood as the terms of the EU General Data Protection Notice (Regulation Nr. (EU) 2016/679, „**GDPR**”).

The Controller processes the CV, motivation letter and personal data contained in it and sent to us, especially the name, contact data and information concerning qualification of the applicant (hereinafter referred to as „**Application Material**”) as data controller for the following purposes.

### Recruitment process:

The data processing is necessary for the performance of the contract to which the data subject is party (i.e. processing during the recruitment process in order to conclude the contract necessary to establish an employment relationship). Please note that providing your information is voluntary, but if you do not provide the required information you will not be involved in the recruitment or selection process. The Application Material will be processed on paper and electronically until the selection process is complete, according to the specifics of the application submission and the job application.

Once the selection process is complete, paper and electronic data processing will be discontinued, paper documents will be destroyed, and electronic data will be deleted.

For more information on data processing, please see the table below:

The purpose of processing	The legal basis of processing	The scope of data	The term of processing
Processing the personal data of Applicants for the purpose of filling the posts announced by the Company and selected by the Applicants (recruitment), and documenting the selection process	Article 6.1 (b) of the GDPR (data processing is necessary in order to take steps at the request of the data subject, to assess the application prior to entering into a contract of employment).	The information contained in the Application Material, including in particular the CV, the letter of motivation sent to us during the application process and the personal data contained therein, as well as the personal data needed to contact the person concerned (including, in particular, name, email address).	The duration while the data are stored is <b>5 years</b> after the completion of the selection procedure in accordance with Section 6:22 of the Act Nr. V of 2013 on the Civil Code in case of a possible claim by way of judicial or authority proceedings against the Company in connection with the job application. This is the time period during which the applicant may assert a claim in connection with the recruitment process e.g. on the grounds of the prohibition of negative discrimination or for the future assessment of job applications it may

			<p>be justified for the Company to keep it on record internally for the afore-mentioned period in case somebody earlier applied for a job at the Company. In the event of the enforcement of a claim, the initial legal basis of the data processing shall be replaced by Article 6.1 (f) of the GDPR. The data processing will be required for the enforcement of the legitimate interest of the Company: participation in one or more proceedings related to the enforcement of the claim and presentation of the defence of the Company.</p>
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**Further handling of job Application Materials for a new position for later contact:**

If, after the end of the selection process, you give your written consent for further data processing, the Application Material will be processed electronically in the Controller's Electronic Document Management System for one year from the date of your giving consent. The purpose of the data processing is to allow us to contact you later if a new position is opened. In this case, you may withdraw your consent at any time, in which case your Application Material will be deleted. You may notify us at the time of your sending your Application Material or later if you do not wish to have your Application Material further processed for this purpose. For more information on data processing, please see the table below:

Purpose of processing	Legal basis of processing	Scope of data processed	Time of processing
<p>Processing the Application Material in order to make it possible that the Company could contact the applicant later with an offered job directly (e.g. when a job becomes vacant)</p>	<p>Article 6.1 (a) of the GDPR (voluntary consent).</p> <p>The Company may request the applicant to give consent to retaining the Application Material even after the closing of a recruitment process or in the absence of a job vacancy with the purpose of making a future offer (e.g. when there is no vacancy in the particular area</p>	<p>The personal data originally provided by the applicant.</p>	<p>Until withdrawal of the applicant's consent, in the absence thereof, <b>1 year</b> after the completion of the selection process and sending / submitting the job application to the Company. This is the period during which the Company believes that the data required for the data processing purpose may be up-to-date and</p>

	<p>related to the application of an applicant but there may be one later).</p> <p>The applicant may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal.</p> <p>The consent is voluntary; however, the Company cannot directly address the given applicant with a job offer in the future in the absence of the consent.</p>		accurate.
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### Data protection rights and remedies:

The detailed rights and remedies of the individuals, including the applicants and other persons (e.g. person who submit a job application on behalf of somebody else), are set forth in the applicable provisions of the GDPR (especially in Articles 15, 16, 17, 18, 19, 77, 78, 79, 80, and 82 of the GDPR). The summary set out below describes the most important provisions and the Company provides information for applicants and other affected persons in accordance with the above articles about their rights and remedies related to the processing of personal data.

The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the individual, information may also be provided orally, provided that the identity of the individual is proven by other means.

The Company will respond without unreasonable delay and by no means later than within one month of receipt to the request of an individual whereby such person exercises his/her rights about the measures taken upon such request (see Articles 15-19 of the GDPR). This period may be, if needed, extended by further two months in the light of the complexity of the request and the number of requests to be processed. The Company notifies the individual about the extension also indicating its grounds within one month of the receipt of the request. Where the request has been submitted by electronic means, the response should likewise be sent electronically unless the individual otherwise requests.

In case the Company does not take any measure upon the request, it shall so notify the individual without delay but by no means later than in one month stating why no measures are taken and about the opportunity of the individual to lodge a complaint with the data protection authority and to file an action with the courts for remedy.

### The data subject's right of access

- (1) The affected person has the right to obtain confirmation from the Company whether or not personal data concerning him/her are being processed. Where the case is such, then he/she is entitled to have access to the personal data concerned and to the following information:
  - a) the purposes of the processing;

- b) the categories of personal data concerned;
  - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed;
  - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - e) the right of the affected person to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the affected person;
  - f) the right to lodge a complaint with a supervisory authority; and
  - g) where the personal data are not collected from the data subject, any available information as to their source.
- (2) The Company provides a copy of the personal data undergoing processing to the data subject. The Company may charge a reasonable fee based on administrative costs for requested further copies. Where the affected person submitted his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless otherwise requested by the data subject.

### **Right to rectification**

The data subject has the right to request that the Company rectify inaccurate personal data which concern him/her without undue delay. In addition, the data subject is also entitled to have incomplete personal data completed e.g. by a supplementary statement or otherwise.

### **Right to erasure ('right to be forgotten')**

- (1) The affected person has the right that when he/she so requests, the Company shall erase the personal data concerning him/her without delay where one of the following grounds applies:
- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Company;
  - b) the affected person withdraws consent on which the processing is based, and is no other legal ground subsists for the processing;
  - c) the personal data have been unlawfully processed;
  - d) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject.
- (2) Paragraph (1) shall not apply to the extent that processing is necessary, among other things, for:
- a) exercising the right of freedom of expression and information;
  - b) compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject;
  - c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
  - d) the establishment, exercise or defence of legal claims.

### **Right to restriction of processing**

- (1) The affected person has the right to obtain a restriction of processing from the Company where one of the following applies:
- a) the accuracy of the personal data is contested by the affected person, for a period enabling the Company to verify the accuracy of the personal data;
  - b) the processing is unlawful and the affected person opposes the erasure of the personal data and requests the restriction of their use instead;
  - c) the Company no longer needs the personal data for the purposes of the processing, but the affected person requires them for the establishment, exercise or defence of legal claims.

- (2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with consent of the affected person or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
- (3) The Company informs the affected person whose request has served as grounds for the restriction based on the aforesaid, before the restriction of processing is lifted.

### **Notification obligation regarding rectification or erasure of personal data or restriction of processing**

The Company will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company informs the affected person about those recipients if he/she so requests.

### **Right to lodge a complaint with a supervisory authority**

The affected person has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the GDPR. In Hungary, the competent supervisory authority is the Hungarian Authority for Data Protection and Freedom of Information (<http://naih.hu/>; 1530 Budapest, Pf.: 5.; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

### **Right to an effective judicial remedy against a supervisory authority**

- (1) The affected person has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him/her.
- (2) The affected person has the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform him/her within three months on the progress or outcome of the complaint lodged.
- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

### **Right to an effective judicial remedy against the Company**

- (1) The affected person, without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, has the right to an effective judicial remedy where he/she considers that his/her rights under the GDPR have been infringed as a result of the processing of his/her personal data in non-compliance with the GDPR.
- (2) Proceedings against the Company shall be brought before the courts of the Member State where the Company has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the affected person has habitual residence. In Hungary, the competent court is the tribunal. The affected person has the right to initiate proceedings at the tribunal of his/her domicile or place of residence, as he/she selects. You can find information on and contacts of the competent courts (tribunals) at [www.birosag.hu](http://www.birosag.hu).

### **Contact person of the Controller in data protection matters:**

Name:

Udvarev-Tóth Rita

Contact data:

[udvarev-toth.rita@humantelex.hu](mailto:udvarev-toth.rita@humantelex.hu)

**Other circumstances:**

For further circumstances/aspects of data processing, the provisions of Act Nr. CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information and the GDPR are regarded as governing.