

INRIMAS KFT.'S PRIVACY NOTICE FOR JOB APPLICATIONS

Introduction

- 1.1. INRIMAS Kft. as data controller (hereinafter referred to as the "**Company**" or the "**Controller**") informs job applicants in this information notice (hereinafter referred to as the "**Notice**") about the way it processes personal data of data subjects in the case of individuals applying for the job vacancies it advertises.
- 1.2. When recording, processing and transferring the personal data of the Data Subject, the Controller complies with the provisions 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 referred to as "**GDPR**" or General Data Protection Regulation), Act CXII of 2011 on the Right to Informational Self-Determination and on Freedom of Information (hereinafter referred to as "Information Act"), and other legal provisions and recommendations of public authorities on data protection.
- 1.3. To ensure compliance with data security requirements, the Controller provides for the protection and security of the personal data of the data subject, in particular in the event of accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.
- 1.4. Personal data are processed with the consent of the data subjects, based on authorisation by law, and/or to the extent necessary for the performance of a contract and in connection with the enforcement of the legitimate interests of the Controller. Its internal organisational units take all necessary data security, technical and organisational and administrative measures to ensure an adequate level of security of personal data. To this end, the functions of operating and developing security, data protection and IT systems are separate and independent from each other within the company.
- 1.5. We also make a statement concerning the purposes for, and the way in, which we use such data and how we ensure the retention and protection of personal data.

Please read the Privacy Notice carefully before submitting your application to us so that you understand how we will process your personal data, and know your rights regarding data processing. For further information, or if you have any comment or objection to make regarding the processing of your data, please do not hesitate to contact **INRIMAS Kft.** at:

Registered office:	H-1046 Budapest, Klauzál utca 10.
Telephone:	+36 30 322 29 05
E-mail:	info@inrimas.hu

1. Definitions

Controller:

Company name:	INRIMAS Kft.
Registered office:	H-1046 Budapest, Klauzál utca 10.
Company registration number:	01-09-417899

Web:	www.inrimas.hu
Represented by:	Gábor Pap, CEO József Kerékgyártó, Managing Director
Telephone:	+36 30 322 29 05
E-mail:	info@inrimas.hu
Contact person for data protection:	info@inrimas.hu

Definition of terms relating to processing:

For the purposes of this Notice the definitions set out below apply:

‘personal data’ means any information relating to an identified or identifiable Data Subject; an identifiable Data Subject (natural person) is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

‘controller’ means the Controller, as well as the natural or legal person or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

‘processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

‘recipient’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law will not be regarded as recipients; the processing of those data by those public authorities must be in compliance with the applicable data protection rules according to the purposes of the processing;

‘third party’ means a natural or legal person, public authority, agency or body other than the Data Subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

‘consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

‘sensitive data’ means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, health data or data concerning a natural person’s sex life or sexual orientation;

'health data' means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about their health status;

'transfer' means providing access to personal data to a specific recipient;

'personal data breach' means a breach of security in relation to the processing of personal data leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted or stored or otherwise processed.

Other definitions defined in the Regulation are set out in Article 4 thereof.

Data Subjects

The Notice applies to every individual responding to any of the Controller's job advertisements or applying for any job not advertised by the same (hereinafter referred to as "**Applicant**" or "**Data Subject**"). By transmitting their job application to the Company, the Applicant accepts the provisions hereof and consents to the processing of their data as set out herein. Without an advertised position, the Controller will immediately notify the Applicant of the Notice after receipt of the application and request the Applicant's confirmation of their having familiarised themselves with the content hereof. The Controller has the right to unilaterally amend this Notice at any time.

The Controller will bring this Notice to the Applicants' attention,

- a) if possible, before the Applicant's submission of their data, or
- b) in view of the specific circumstances in which the personal data are to be processed, within a reasonable period – but not more than one month – from the date of its receipt of the personal data; or
- c) if the personal data concerned are used for communicating with the Applicant, upon the first contact with the Applicant; or
- d) if the data are likely to be disclosed to other recipients as well, not later than when the personal data are disclosed for the first time.

2. Purposes, legal bases, scope and duration of processing, data security

2.1. Purposes of the processing:

- (I) recruitment;
- (II) communication;
- (III) enforcement or exercise of rights

For purposes I and II, the legal basis for processing is the Data Subject's voluntary consent pursuant to Article 6(1)(a) of the GDPR. If the Data Subject also provides specific personal data in connection with their application, the legal basis for the processing is their voluntary, explicit and informed consent, pursuant to Article 9(2)(a) of the GDPR. If the Applicant also provides personal data in connection with their application regarding their reduced capacity to work,

health impairment or health damage, the Controller will also process such data on the basis of explicit consent pursuant to Article 9(2)(a) of the GDPR.

The data are processed by the Controller through its Website and other websites offering job advertisements for the purposes of registering applicants in the database, evaluating the applications, notifying the applicants after the closure of the selection process and, with specific consent, for further storage in INRIMAS Kft.'s own database.

In the case of purpose III: Processing of the Applicant's personal data for legitimate interests pursuant to Article 6(1)(f) GDPR.

The purpose of processing is to enable the Company to meet its obligation to provide evidence in case the Applicant exercises their rights. In the case of a rejected application the Company retains the Applicant's online and paper-based data for a period of 3 years after rejection, in case legal remedy is sought in relation to the provisions regarding the procedure of the Directorate General for Equal Treatment before the Office of the Commissioner for Fundamental Rights. In the case of this purpose of processing, the Company only stores but not actively processes data.

Legal basis for processing: processing of the Applicant's personal data for the Company's legitimate interests pursuant to Article 6(1)(f) GDPR.

2.2. Scope of data processed and duration of processing

ad I and II, Data processed for recruitment/contact purposes

The following data of Applicants are processed by the Company: all the data provided by an Applicant in the Data Sheet and their application/resume, including, in particular:

The data to be processed	Purpose of processing
Name of applicant	necessary for identification
place and date of birth	necessary for identification
mother's name	necessary for identification
photo	necessary for identification
e-mail address	necessary for communication
address of residence	necessary for communication
title of position applied for	necessary for identifying the application
previous work experience	necessary for the assessment of the application and the selection of the person with the right skills
qualifications	necessary for the assessment of the application and the selection of the person with the right skills
foreign language skills	necessary for the assessment of the position, for the selection of the person with the right skills

sensitive data: e.g. health data, medical data of a person with disabilities	sensitive data are only processed if it is necessary for filling the position
other information included in the resume submitted by the Applicant	necessary for the assessment of the application and the selection of the person with the right skills
cover letter submitted by the Applicant	necessary for the assessment of the application and the selection of the person with the right skills
indication of specific consent to the processing of data for 1 year after application in case the Applicant is not hired	necessary as a legal basis for further processing in case the Applicant is not selected for hiring
required salary	necessary for the evaluation of the application
test work carried out during the selection process	necessary for the assessment of the application and the selection of the person with the right skills

Scope, limits and duration of processing

The Controller will process the personal data of Applicants only to the extent and for the duration necessary for the purposes set out above. Only personal data that are necessary for reaching the purpose of the processing and are adequate for reaching the purpose may be processed.

The Controller will process the data of the Applicants for recruitment/contact purposes for the time necessary to achieve the purpose, i.e. until the application is assessed, the advertised job is filled and the employment contract is concluded, or for a further period of 1 year after the assessment of the application, only with the express consent of the Applicant, or until the Applicant's request for erasure in the meantime has been complied with, in order to enable the Company to assess the suitability of the applicant's competences and to contact the applicant if justified in the event of a vacancy for the same or a similar post at a later date. A request for erasure filed by the Applicant in the meantime interrupts processing, in which case the end of processing is the date of the erasure. In the absence of the Applicant's request for erasure, the Company will automatically erase the Applicant's personal data at the end of the contact period (when the purpose of processing is fulfilled) (except for the purpose of processing based on legitimate interest). The data of a hired Applicant will continue to be processed in accordance with the Company's Privacy Notice for Employees.

ad. III, Data processed for the exercise or enforcement of rights

The same data are processed for this purpose as those processed during the recruitment process.

Scope, limits and duration of processing

In the case of a rejected application, the Company retains the Applicant's data – processed for the purposes of exercising or enforcing rights – for a period of 3 years after rejection, in case

legal remedy is sought in relation to the procedure of the Directorate General for Equal Treatment before the Office of the Commissioner for Fundamental Rights. In the case of this purpose of processing, the Company only stores but not actively processes data.

3. Recipients of processing

Applicants' personal data may be disclosed to the following persons within the Controller Company for the following purposes, to the necessary extent:

Human Resources staff for the following purposes:

- preparation and storage of employment documents and contracts.

Persons who have access to personal data at the Controller are bound by confidentiality obligations with regard to the personal data of Applicants, i.e. they must treat personal data and other information obtained in the course of their duties or otherwise as confidential and not disclose it to third parties. This obligation survives the termination of employment without limitation in time.

Persons engaged in data processing are obliged to maintain the confidentiality of the personal data they process, and to refrain from using them for their own purposes, from disclosing them to the public as well as from transferring them to, or making them available for, anybody, except in the cases listed in the Notice.

4. Source of data:

The Controller receives the Applicants' data either directly from the Applicants or from a recruitment agency.

The Applicant may withdraw their consent to processing at any time, but this does not affect the lawfulness of the processing carried out on the basis of the consent before its withdrawal.

If the Applicant fails to provide personal data or provides incomplete data, depending on the type of incomplete data, the attempt to contact the Applicant fails or the Controller does not have sufficient data to assess the Applicant's suitability for the position concerned, it will not be possible to assess the Applicant's suitability for the position, and no employment contract can be concluded.

5. The place of processing, the type of processing technology used and data security:

The Controller designs and develops its entire data protection process in view of the requirement of data security, in observance of the "privacy-by-design" principle of data protection by default and by design. The Controller aims to minimise the processing of personal data in order to reduce the risks of processing.

Persons who have access to personal data at the Controller are bound by confidentiality obligations with regard to the personal data of Applicants, i.e. they must treat personal data and other information obtained in the course of their duties or otherwise as confidential and not disclose it to third parties. This obligation survives the termination of employment without limitation in time. Persons engaged in data processing are obliged to maintain the confidentiality of the personal data they process, and to refrain from using them for their own purposes, from disclosing them to the public as well as from transferring them to, or making them available for, anybody, except in the cases listed in the Notice.

The Controller also takes the technical and organisational measures and complies with the procedural rules that are necessary for ensuring data protection and data security.

The Applicant acknowledges that the Controller excludes liability for any damage or loss resulting from any failure or malfunction of the IT connection. The Applicant acknowledges that any files they may attach will be subjected to virus scanning and other data and information security screening by the Controller. The computing elements of the system are located on the Controller's servers.

The Controller will protect the security of processing by technical and organisational measures to ensure a level of protection appropriate to the risks associated with the processing, by selecting and operating the IT tools used in such a way that the processed data:

- a) are accessible to authorised persons (availability);
- b) are authentic and verified (authenticity of processing);
- c) can be verified to be unaltered (data integrity);
- d) are accessible only to the authorised person and protected against unauthorised access (data confidentiality).

Backup

The Controller makes backup copies of its electronically stored data on a daily basis. The Controller stores the backup copies on its own server. Legal basis for processing data relating to backups: the Controller's legitimate interest to comply with the requirements of the GDPR and to ensure the continuous and uninterrupted availability of data generated in the course of its activities. The Controller processes a significant amount of data, and there is a significant public interest in the safe storage of such data and its recovery in the event of possible damage.

Purpose of the processing: to increase data security, to retain documents related to the operation of the Controller and to recover them in case of a possible data security problem, to ensure the continuity of work processes.

Duration of backup storage: up to 5 years.

Personal data are stored in paper-based and electronic form on the Controller's servers at the Controller's headquarters.

6. Personal data breaches

In the event of a personal data breach or a privacy incident, the Controller's employees are obliged to report the occurrence to the Data Protection Officer/Managing Director immediately upon its notification/detection.

If the personal data breach poses a high risk to the rights and freedoms of the Applicant, the Controller informs the Applicant of the personal data breach without undue delay, in particular about:

- the name and contact details of the Data Protection Officer
- the likely consequences of the occurrence
- the actions planned or taken to remedy the situation.

The Controller keeps a record of personal data breaches, their known impacts and the actions taken in response.

7. Data processors

In order to achieve the data management purposes set out in point 2, the Controller may use services of third parties to perform certain of its tasks, which may involve the processing of Applicants' personal data. Such third parties (hereinafter referred to as "**Processors**") carry out processing in accordance with the instructions of the Controller and in compliance with the provisions of the applicable legislation. For the purposes of processing, only the personal data necessary for the fulfilment of that purpose will be transmitted to each Processor.

8. Data transmission

The Controller may have the right and, at the same time, be obliged, to transfer Applicants' personal data to certain third parties in special cases specified by law, in particular, including without limitation, a court, public authority, police, prosecutor's office, local government, national security service. The Applicant has the right to be informed of the transfer of their data to a third party, unless the provision of such information would jeopardise the purpose of the transmission of the data concerned.

The Controller keeps a record of data transmissions, which includes:

- the date of transmission of the personal data;
- the legal basis of transmission;
- the recipient;
- the personal data transmitted.

The Controller declares that it will not transmit Applicants' personal data to any third country, i.e. any country outside the European Union (nor make such data accessible to any controller operating in any third country).

The Controller ensures that the legal conditions for processing (purpose, legal basis) are met during transmission as well and that such transmission will not violate the rights of the Applicant.

9. The Applicant's rights in relation to processing

The Company draws the attention of Data Subjects to the fact that in the event of a complaint or comment, it is advisable to contact the Company as Controller using one of the contact details indicated in this Notice.

The rights of the Applicant:

a) right of access

The Applicant has the right to obtain from the Controller confirmation as to whether or not his or her personal data are being processed and, if such processing is ongoing, the right to be informed about the personal data being processed, the purposes of the processing, the categories of data, the recipients, the storage period, his or her rights and the source of the data.

The Company provides the Applicant with a copy of the personal data subject to processing. For additional copies requested by the Applicant, the Controller may charge a reasonable fee based on administrative costs.

b) right to rectification and erasure

The Applicant has the right to have inaccurate personal data concerning them corrected by the Controller without undue delay upon their request. In view of the purposes of processing, the Applicant has the right to have incomplete personal data complemented, including by means of providing a supplementary statement.

c) right to erasure/right to be forgotten

The Applicant has the right to have their personal data erased by the Controller without undue delay upon their request. The Applicant may withdraw their consent to data processing – with effect from a certain point in time – in which case the Controller is entitled to continue processing the data in accordance with the purpose of the processing until such point in time. If the purpose of processing ceases to exist or the Applicant withdraws their consent to processing, the Controller will no longer process the Applicant's data but will erase the personal data relating to the Applicant without further notice to the Applicant in accordance with its rules on erasure.

d) restrictions on the processing of data;

The Applicant is entitled to have the Controller limit the processing of their data at their request if one of the following conditions is met:

- the accuracy of the personal data is contested by the Applicant, in which case processing is limited for a period during which the Controller can verify the accuracy of the personal data;

- processing is unlawful and the Applicant objects to the erasure of the data and requests restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the Applicant for the establishment, exercise or defence of legal claims; or the Applicant has objected to the processing pending the verification whether the legitimate grounds of the Controller override those of the Applicant.

Where processing has been restricted under the above, such personal data will, with the exception of storage, only be processed with the Applicant's consent 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 important grounds of public interest of the European Union or of a Member State. The Controller communicates 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.

e) the right to data portability

The Applicant will have the right to receive the personal data concerning him or her, which he or she has provided to a Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Controller where the processing is based on consent and the processing is carried out by automated means. When exercising their right to data portability, the Applicant has the right to have their personal data transmitted directly from one controller to another, if it is technically feasible. The exercise of this right must not prejudice the right to erasure. That right cannot not be exercised in relation to processing necessary for the performance of a task carried out in the public interest. The exercise of the right must not adversely affect the rights and freedoms of others.

f) right to object

The Applicant will have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. The Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Applicant or for the establishment, exercise or defence of legal claims. The Applicant shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

Unless the decision is:

- necessary for the conclusion or performance of a contract between the Applicant and the Controller;
- allowed by EU or national legislation to which the Controller is subject and which also lays down suitable measures to safeguard the Applicant's rights and freedoms and legitimate interests; or is based on the Applicant's express consent.

g.) Right to withdraw consent

Where the processing of the personal data is based on the Data Subject's consent, the Data Subject shall have the right to withdraw such consent at any time. In the event of withdrawal of consent, the processing will be terminated by the deletion of his or her personal data, provided that there is no other legal basis for the processing of his or her personal data. Withdrawal of consent has no consequences for the Data Subject. However, the withdrawal of consent will not affect the lawfulness of the processing carried out on the basis of his or her consent before its withdrawal.

The Data Subject is entitled to exercise the above rights in relation to the legal bases as follows:

	<u>Consent</u>	<u>Performance of contract</u>	<u>Legal obligation</u>	<u>Legitimate interest</u>
<u>information</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>rectification</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>limitation</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>erasure</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>objection</u>				<input checked="" type="checkbox"/>
<u>data portability</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
<u>withdrawal of consent</u>	<input checked="" type="checkbox"/>			
<u>complaint</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<u>remedy</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

10. Procedure at the Applicant's request

The Applicant may contact the Company's representative indicated, at any of the contact details listed, at the beginning of this Notice with any of the above requests or other questions or any other request concerning their personal data.

The Controller is obliged to consider requests submitted in writing within 30 days of receipt. If necessary, taking into account the complexity of the request or the number of pending requests, the Company may extend the time limit for processing the request. The Applicant concerned must be informed in advance of such an extension and its causes. If the Applicant's request is justified, the Controller will implement the requested measure within the procedural time limit and will inform the Applicant in writing of the implementation. If the Controller rejects the Applicant's request, it shall take a written decision to that effect. In its decision, the Controller shall state the facts on which the decision is based, the reasons for the decision, with reference to the relevant legislation and case law, and shall inform the Applicant of the legal remedies available against the decision of the Controller.

An Applicant may only be obliged to pay the costs relating to the exercise of their rights only if the Controller has informed the Applicant in writing within 8 days of receipt of their request that their request is excessive and at the same time informed them of the amount of administrative costs, but the Applicant has maintained their claim in writing despite these circumstances. A claim is considered to be maintained if the Applicant does not withdraw their application within 5 working days or by the end of the administration time limit, in spite of

having been informed by the Controller. The Applicant who is liable for the costs shall pay the costs separately within 8 days of receipt of the payment request issued by the Controller.

If the Applicant does not agree with the Controller's decision or if the Controller fails to comply with the relevant procedural time limit set out above, the Applicant may refer the matter to the supervisory authority or to a court.

Supervisory Authority

If the Applicant considers that the processing of his or her personal data by the Controller violates the provisions of the applicable data protection legislation, in particular the GDPR, he or she shall have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information.

Contact details of the National Authority for Data Protection and Freedom of Information:

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

Address: 1055 Budapest, Falk Miksa utca 9-11., Mailing address: 1363 Budapest, Pf.: 9.

Phone: +36-1-391-1400 Fax: +36-1-391-1410,

E-mail: ugyfelszolgalat@naih.hu

Applicants also have the right to lodge complaints with a supervisory authority established in another EU Member State, in particular in the EU Member State of his or her habitual place of residence, place of work or place of the presumed infringement.

Right to bring an action (right to go to Court)

Irrespective of his or her right to lodge a complaint, the Applicant may go to court if his or her rights under the GDPR have been infringed in the processing of his or her personal data.

The Controller, as a Hungarian controller, may be sued before a Hungarian court. For the contact details of regional courts in Hungary, please visit: <http://birosag.hu/torvenyszekek>.

11. Miscellaneous provisions

The Controller reserves the right to unilaterally amend this Notice at any time in accordance with the law.

Budapest, 15 March 2024

INRIMAS Kft.
Controller

DECLARATION

*I, the undersigned (name) (mother's name:, address of residence:), as an applicant responding to the job advertisement of **INRIMAS Kft.** (Registered office: 1011 Budapest, Szilágyi Dezső tér 1. fszt. 4. ajtó hereinafter: **Company**)*

declare,

*that I have familiarised myself with the information on facts relating to the processing of my personal data, laid down in the relevant document entitled "**Privacy notice relating to job applications**" issued by **INRIMAS Kft.** as **Controller** in effect on the day written below and that I have acknowledged its content.*

I, the undersigned declare, under penalty of perjury, that the information I have provided is true and correct and that I am entitled to process the information I have provided and to transmit it to the Controller.

In the case of processing based on consent I, the undersigned, expressly consent to the Controller's processing my data specified below, as described in the Privacy Notice relating to Job Applications. I am not disclosing the data to the processing of which I do not consent.

I further declare that I have been authorised by the data subject(s) to disclose any personal data that are not my own, which I may have provided to the Controller.

I acknowledge that I may exercise my rights under the provisions of the applicable data protection legislation, I have the right to access and data portability, I may request the rectification, limitation of processing, or erasure, of the data being processed, I may object to the processing of my data by post, in person through my line manager and/or at the address of the Controller's central administration or at the e-mail address of the Controller, and I may exercise my rights to legal remedy.

Dated:

Applicant's signature