

PRIVACY NOTICE

I. THE PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice (hereinafter: “**NOTICE**”) is intended to specify the purpose of the data-protection and data-control principles used by **PEOPLE GROUP KOMMUNIKÁCIÓS KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG** (Company registration no: 01-09-195238; Tax number: 25022423-2-41; Registered seat: 1036 Budapest, Perc utca 8.; hereinafter jointly: “**DATA CONTROLLER**”) and its data-protection and data-control policy, by which the Data Controller, as data controller, acknowledges to be bound.

This Notice sets out the principles for the processing of personal data of users visiting the Website (as defined below) operated by the Data Controller, of job applicants submitting a job application through the Website and of natural persons who have expressed interest in the services of the Data Controller through the Website, by email, by telephone or otherwise (hereinafter collectively referred to as “**DATA SUBJECT**” or “**DATA SUBJECTS**”).

Unless otherwise specified, the Privacy Notice does not cover the processing carried out by the Data Controller in the context of its agency activities.

The Data Controller shall inform its customers individually of the conditions of the related data processing when concluding the relevant contract.

In drafting the provisions of the Privacy Notice, the Data Controller has considered in particular the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and on repealing Regulation (EC) No 95/46/EC (hereinafter: “**GENERAL DATA PROTECTION REGULATION**” or “**GDPR**”) and of Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information (hereinafter: “**INFOTV.**”).

II. DEFINITIONS

Data processing: 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, organization, structuring, storage, conversion or alteration, retrieval, viewing, use, disclosure, transmission by dissemination or otherwise providing access, alignment or combination, restriction, erasure or destruction.

Data controller, joint data controllers: the person who, alone or jointly with others, determines the purposes and means of the processing of personal data. If the purposes and means of the data processing are jointly determined by two or more data controllers, they are considered to be joint data controllers.

Personal data: any information relating to an identified or identifiable natural person (“data subject”); a natural person is identifiable if they can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal data breach: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to Personal Data transmitted, stored or otherwise processed.

Data processor: a natural or legal person, public authority, agency or any other body that processes Personal Data on behalf of the Data Controller. The following can be Data Processors under this Notice:

- Magyar Posta Zártkörűen Működő Részvénytársaság
1138 Budapest, Dunavirág utca 2-6.
- Proweb Internet Kft., 1026 Budapest, Pasaréti út 23/a.
- Macademia Kft., 1071 Budapest, Damjanich u. 19.

Website: the webpage peoplegroup.hu operated by the Data Controller.

III. THE DATA PROCESSED BY THE DATA CONTROLLER, THE PURPOSES, LEGAL BASIS AND DURATION OF THE DATA PROCESSING

Based on the User's choice, the Data Controller may process the following data in connection with the use of the Services available through the Website, in respect of certain Services:

(A) CONTACT

Contact, questions and enquiries in connection with the Data Controller's services on the Website, by telephone or otherwise.

Scope of personal data processed:

- name;
- email address;
- phone number;
- the subject and content of the message.

Purpose of the Data Processing: The purpose of processing Personal Data under this section is to process, manage and respond to contact attempts. The Data Controller will not use the provided Personal Data for purposes other than those described in this section.

Legal Basis for Processing: The legal basis for the Data Processing is the consent of the Data Subject. In case the Data Processing is based on consent, the Data Subject has the right to withdraw their consent at any time, which does not affect the lawfulness of the Data Processing prior to the withdrawal.

Duration of the data processing: The Data Processing lasts until the purpose of the Data Processing is achieved, i.e. until the purpose of the contact is fulfilled or the Data Subject's consent is withdrawn, provided that no other legal basis requires the continuation of the Data Processing.

(B) JOB APPLICATION

To submit an application for a job advertised by the Data Controller on the interface provided for this purpose on the Website.

Scope of personal data processed:

- name;
- email address;
- phone number;
- the content of the CV, which is determined solely by the Data Subject.

Purpose of the Data Processing: The purpose of the processing of Personal Data under this section is to carry out the recruitment process for the advertised job.

Legal Basis for Processing: The legal basis for the Data Processing is the consent of the Data Subject. In case the Data Processing is based on consent, the Data Subject has the right to withdraw their consent at any time, which does not affect the lawfulness of the Data Processing prior to the withdrawal.

Duration of the data processing: The Data Processing lasts until the purpose of the Data Processing is achieved, i.e. until the recruitment process is fulfilled or the Data Subject's consent is withdrawn, provided that no other legal basis requires the continuation of the Data Processing.

(C) COOKIE(S)

The processing of the Website visitors' data, the use of cookies.

By visiting the Website, the Data Subject consents to the placing of cookies by the Data Controller on their computer (or other similar device) to assist the operation of the Website and to provide information about the Website users' behavior on the webpage.

The Data Controller uses this information for the purpose of improving the Website.

The Data Controller obtains only anonymized and aggregated technical information through the cookies it uses. The purpose of these cookies is to allow the Data Controller to ensure easy navigation on the Website, to identify which parts of the Website are of particular interest to visitors and to improve the Website in general. The information collected in this way does not make it possible to identify the user individually.

The Data Controller does not intend to identify the Website visitors individually, unless they voluntarily provide their data through the Website in some way.

When cookies are used, the data carried by cookies may be processed until the Data Subject disables the use of cookies in their browsing preferences, but not after the Data Processing is no longer necessary for the technical operation of the Website.

IV. PROFILING

The Data Controller does not use automated decision making and does not profile Data Subjects from the available data and does not use the Data Subjects' data for direct marketing purposes

V. THE RIGHTS OF THE DATA SUBJECT AND HOW TO EXERCISE THEM

The Data Subject may request the **Data Controller to inform them** whether it processes their Personal Data, and if so, provide them access to the Personal Data processed by the Data Controller, in particular with regard to the following:

- the purposes of the Data Processing;
- the categories of the processed Personal Data;
- the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, including in particular recipients in third countries or international organizations;
- where applicable, the planned duration of storage of the Personal Data or, if this is not possible, the criteria for determining that duration;
- the Data Subject's right to request the Data Controller to rectify, erase or restrict the processing of Personal Data concerning them and to object to the processing of such Personal Data;
- the right to lodge a complaint with a supervisory authority;

- where the data have not been collected from the Data Subject, all available information about their source;
- the application of any automated decision making, including profiling, and, at least in these cases, the logic used and clear information about the significance of such Data Processing and the likely consequences for the Data Subject.

The Data Subject may request information about the processing of their Personal Data at any time by sending a written request by registered mail with or without return receipt requested sent to the Data Controller's address or by email sent to office@peoplegroup.hu.

A request for information sent by postal mail is considered authentic by the Data Controller if the Data Subject can be clearly identified on the basis of the request sent. A request for information sent by email is considered authentic by the Data Controller only if it is sent from the email address provided by the Data Subject.

The Data Subject may request the **rectification or modification of their Personal Data** processed by the Data Controller. Taking into account the purpose of the Data Processing, the Data Subject may request the **completion of incomplete Personal Data**.

The Personal Data provided by the Data Subject may be modified by sending an email to the above email address of the Data Controller. Once a request to modify personal data has been fulfilled, the previous (erased) data can no longer be restored.

- The Data Subject may request the **erasure of their Personal Data** processed by the Data Controllers; however, the erasure may be refused
- if the processing of Personal Data is authorized by law; and
 - to bring, enforce or defend legal claims.

The Data Controller shall always inform the Data Subject about refusing the request for erasure, indicating the reasons for the refusal. Once a request for erasure of personal data has been fulfilled, the previous (erased) data can no longer be restored.

- The Data Subject may request the **Data Controller to restrict the processing of their Personal Data** if
- the Data Subject contests the accuracy of the Personal Data, in which case the restriction applies for the period of time that allows the Data Controller to verify the accuracy of the Personal Data;
 - the processing is unlawful and the Data Subject opposes the erasure of the data and requests instead the restriction of their use;
 - the Data Controller no longer needs the Personal Data for the purposes of the Data Processing, but the Data Subject requires them for the establishment, exercise or defense of legal claims; or
 - the Data Subject has objected to the Data Processing, in which case the restriction applies for the period until it is established whether the legitimate grounds of the Data Controller prevail over the legitimate grounds of the Data Subject.

The Data Subject may **object to the processing of their Personal Data**,

- if the processing of the Personal Data is necessary solely for compliance with a legal obligation of the Data Controller or for the purposes of legitimate interests pursued by the Data Controller or a third party;
- if the purpose of Data Processing is direct marketing, opinion polling or scientific research; or

- if Data Processing is carried out to perform a task of public interest.

The Data Controller shall examine the lawfulness of the Data Subject's objection and, if the objection is justified, shall terminate the Data Processing and lock the Personal Data processed and shall notify the objection and the action taken in relation to it to all who have received the Personal Data involved in the objection.

VI. PERSONAL DATA BREACH

In the event of a Personal Data Breach, where the Personal Data Breach is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall inform the Data Subject of the Personal Data Breach without undue delay. The Data Subject need not be informed if any of the following conditions are met:

- the Data Controller has implemented appropriate technical and organizational protection measures and these measures have been applied to the data affected by the Personal Data Breach, in particular measures, such as the use of encryption, which render the data unintelligible to persons not authorized to access the Personal Data;
- the Data Controller has taken additional measures following the Personal Data Breach to ensure that the high risk to the rights and freedoms of the Data Subject is no longer likely to emerge;
- informing would require a disproportionate effort. In such cases, the Data Controller shall inform the Data Subjects by means of publicly disclosed information or by taking similar measures to ensure that the Data Subjects are informed in a similarly effective manner.

VII. DATA PROCESSING

The Data Controller employs the Data Processors named above in this Privacy Notice to perform its activities.

Data Processors do not make independent decisions, they are only entitled to act in accordance with the contract concluded with the Data Controller and the instructions received.

The Data Controller shall monitor the work of the Data Processors.

Data Processors are entitled to employ an additional data processor only with the consent of the Data Controller.

VIII. DATA TRANSMISSION

Data Transmission to Data Processors as set out in this Privacy Notice may be made without the specific, case-by-case consent of the Data Subject, as the Data Subject gives their explicit and unambiguous consent to such transmissions by accepting this Privacy Notice. Unless otherwise provided by a legislation, the disclosure of Personal Data to third parties or public authorities is possible only on the basis of a public authority decision or with the prior explicit consent of the Data Subject.

The Data Controller is entitled and obliged to transmit to the competent authorities any Personal Data at its disposal and stored by it in accordance with the law which the Data Controller is required to transmit by law or by a final and binding order of a public authority. The Data Controller cannot be held liable for such transmissions and the consequences thereof.

The Data Controller shall keep records of data transmissions for the purposes of monitoring the lawfulness of data transmissions and providing information to the Data Subject.

The Data Controller does not transfer Personal Data to third countries.

IX. ENFORCEMENT OPTIONS

If you have any questions or comments about data processing, you can contact the Data Controller's staff at office@peoplegroup.hu.

The Data Subject may lodge a complaint about the Data Processing directly with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; phone: +36-1-391-1400; email: ugyfelszolgalat@naih.hu; website: www.naih.hu).

In the event of a violation of the Data Subject's rights, the Data Subject may take legal action. The court has competence to adjudicate the litigation. The litigation may also be brought, based on the Data Subject's choice, before the court of the Data Subject's residence or habitual residence. The Data Controllers shall, upon request, inform the Data Subject of the possibilities and means of legal remedy.

Budapest, May 16, 2022.