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## Privacy Notice for Recruitment

PRO PATRIA ELECTRONICS Mérnöki Fejlesztő és Szolgáltató Korlátolt Felelősségű Társaság

### **About this Privacy Notice**

Please read this Privacy Notice, which has the aim of ensuring that we handle your data in accordance 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 Directive 95/46/EC (hereinafter as: “GDPR”), and Act No. CXII of 2011 on information self-determination and freedom of information (hereinafter as: “Privacy Act”).

Please only send us your own, valid data upon submitting your application for the advertised position. Please do not provide sensitive data in your application files to be submitted (so data referring to your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning sex life or sexual orientation).

At PRO PATRIA ELECTRONICS Mérnöki Fejlesztő és Szolgáltató Korlátolt Felelősségű Társaság (head office: 1097 Budapest, Könyves Kálmán körút 12-14. floor 3, phone No.: +36-1-322-7010, e-mail address: [info@propatria-inc.com](mailto:info@propatria-inc.com), representative: Szathmári Géza István, managing director, hereinafter as: “PPE Kft.” or “Company” or “Data Controller”) we recognize that privacy is important and are committed to follow the highest standards of personal data protection under Hungarian and European legislation. We have developed this Privacy Notice to inform you of how PPE Kft. will use the information you submit to PPE Kft. through the [www.propatria-inc.com](http://www.propatria-inc.com) webpage, or in any other way as part of a job application or job search process.

When reading this Privacy Notice, please keep in mind that “Personal Data” (in this Notice also referred to as “Data” or “your Data”) means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, e.g. name and surname, email address, phone number, etc.

When this Privacy Notice mentions “we,” “us,” or the “Company,” it refers to the controller of your Personal Data under this Notice, namely the PPE Kft., which may be interested in offering you a job position or which otherwise decides which of your Data are collected and how they are used.

This Privacy Notice is divided into the following chapters:

1. What personal data do we process about you
2. Purposes of data processing
3. What are our legal bases for processing your personal data
4. Background checks
5. Automated decision making
6. For how long do we keep your personal data
7. What choices and rights do you have regarding your personal data
8. Addressees and categories of addressees of the personal data
9. How do we keep your personal data secure
10. Contact us
11. Right regarding the submission of a complaint on data processing and legal remedy

## 1. What personal data do we process about you

The Privacy Notice concerns all Data that you decide to or are requested to submit in relation to your application for a particular job position, including the following:

- a) Identification Data: Name, email address, telephone number, or other contact information;
- b) Job Application Data: CV, cover letter, previous work experience, education, additional qualification, or other information regarding your professional qualification and experience, education, additional skills and abilities, professional interest, etc. you provide for our consideration in the recruitment process;
- c) Image: We do not require from job candidates to include photos as part of the job application documentation. It is up to you if you would like to voluntarily submit such Data;
- d) Identification of the Job and Personal Requirements: Type of employment sought, desired salary, willingness to relocate, or other job preferences you decide to voluntarily submit;
- e) Referees: Reference letters, names and contact information for referees.

NOTE: If you decide to attach reference letters to your job application, it is your responsibility to obtain consent from referees and inform them of the purposes for which their Data may be processed by us (based on this Privacy Notice) before providing their personal information to us.

- f) At the end of the recruitment process if you are selected we will ask you to provide us with the compulsory occupational health check certification described by the law.
- g) Any other information that you decide to voluntarily share: hobbies, interests, professional plans, how you found about the job offer, what motivates you to apply for us, etc.

You can choose what types of information to submit as part of your job application. Normally, the information in p. a), b), would be strictly necessary to be provided, so we can consider your job application for the particular position. Thus, if you decide not to provide such Data,

we may be prevented from further processing your application. Further if you are selected then p. f) is also requested.

Submitting of any other information would be dependent entirely on you and would be treated as voluntary.

Note, that in case of your selection for the job position you have applied for, the above categories of Data processed will further form part of your employment file (dossier) with PPE Kft. (more information will be provided upon the start of your employment).

Further in the process or during interviews, we may ask for your consent before we obtain additional information from third parties (e.g. former employers for references provided by the national law, etc.) or will, where required by law, notify you that we obtained such data from those third parties.

## **2. Purposes of data processing**

Any Data provided by you in the recruitment procedure will be processed only for the purposes of reviewing and assessing your eligibility as a job candidate for the particular job position as well as for the purposes of our legal and internal compliance, namely:

- a) To assess your skills, qualifications and interests against our career opportunities, to maintain our relationship during the recruitment process, including by calling you and inviting you to interviews, exchange of offers and terms of employment;
- b) To verify your information, to run our internal compliance and conflict checks and to conduct reference/background checks (if required under law or subject to your explicit consent);
- c) To communicate with you;
- d) For security and protection of our organization, IT networks and Company information;
- e) To improve our recruitment process; and
- f) Legal defense as necessary – to defend ourselves in any legal or court proceedings;

If in future we would need to process your personal data for a purpose other than the above we will provide you with information on that purpose and any other relevant information. Where necessary, we may seek for your consent before processing your Data for other purposes.

Note, that in case of your selection for the job position you have applied for, the above categories of Data will be further processed for employment purposes (more information will be provided upon the start of your employment).

### **3. What are our legal bases for processing your personal data**

In order to be able to process your Data in our recruitment campaigns, we rely on different legal bases, including:

- a) Your consent to PPE Kft. to process all Data provided in your CV and related documents, which you have given us by deciding to apply to our job offer and submit your CV and related documents, after reading this Privacy Notice; and/or
- b) The necessity to establish a contractual relationship with you or to take steps in this direction, at your request; and/or
- c) The necessity for us to comply with legal obligations related to recruitment campaigns and/or our regulated type of business activity; and/or
- d) The necessity to pursue our legitimate interests, including;
  - To ensure that our organization, IT networks and information are secure;
  - To administer and generally conduct business within the PPE Kft.; and
  - To protect our interest and rights in event of investigated, suspected or actual violations of law.
- e) Your specific consent (only when legally required or permitted).

NOTE: If we rely on your consent as a legal basis for processing your Data, you may withdraw your consent at any time by submitting a withdrawal request to the following e-mail: [info@propatria-inc.com](mailto:info@propatria-inc.com). Following the receipt of your withdrawal, any Data to which the Withdrawal refers would be deleted from our files and records in accordance with the provisions of Article 17 of the GDPR. The withdrawal of consent, however, does not influence the legality of processing data relying on consent, prior to the withdrawal.

### **4. Background checks**

Considering the business activity of the PPE Kft., for certain position we may need to conduct additional background checks to meet statutory and internal compliance and conflict of interest procedures and verify your eligibility to work at PPE Kft. During the recruitment process we will duly inform you in advance of the details of the background checks.

In this respect, among others, we may collect additional data about you from social media platforms where you maintain an open profile. This would mainly include professional social networks (e.g. LinkedIn, etc.) but to the extend relevant for the applied job position.

### **5. Automated decision making**

We do not apply Automated Decision Making, including profiling, to job candidates in the recruitment process.

## 6. For how long do we keep your personal data

After 12 months have elapsed from the end of the recruitment campaign in question, we will delete any Data you submit or have been sent to us by any third party during the recruitment process. We can not estimate the exact time period for completion of a recruitment campaign as it depends from the job position but we consider this period would be between 2 and 8 months and will be over when a candidate accepts our job offer for the position and for which we are considering you.

Note, that in case you are selected for the job position you have applied for, the above categories of Data will continue being processed as part of your employment file (dossier) with PPE Kft. The ground for such processing is legitimate interest of PPE Kft. to have your employment file completed with your CV and other Data obtained during the recruitment process (more information will be provided upon the start of your employment).

## 7. What choices and rights do you have regarding your personal data

### 7.1 Right to access

You are entitled to request information from PPE Kft. through the contacts given in chapter 10. on whether the processing of your personal data is in progress, and if such data processing is in progress, you are entitled to know that

- the PPE Kft. process
  - which of your personal data;
  - on what legal base;
  - for what data processing purpose;
  - for how long; furthermore
- to whom, when, according to which act has PPE Kft. provided access to which of your personal data or to whom has it forwarded your personal data;
- what source do your personal data originate from;
- whether the PPE Kft. applies automated decision making, and its logic, including profiling as well.

The PPE Kft. provides the copy of the personal data subject to data processing free of charge in case of such a request by the affected for the first time, following this it may charge a price of reasonable amount, based on the administrative costs.

In order to fulfill the data security requirements and to protect the rights of the affected the PPE Kft. is obliged to ascertain the correspondence of the identity of the affected and the person wishing to exercise its right to access, to this end the information, the insight into the data, or the copies thereof are bound to the identification of the affected person.

### 7.2 Right to correction

You may request the PPE Kft. through the contacts given in chapter 10. to modify any of your personal data. In case the affected can satisfactorily certify the precision of the corrected data the PPE Kft. shall correct it within one month, and about this, shall notify the affected person through the contact given by the person.

### 7.3 Right of blocking (restriction of data processing)

You may request the PPE Kft. through the contacts given in chapter 10. to restrict the processing of your personal data (by expressly indicating the restricted nature of the data processing and by ensuring the separate processing from other data) in case

- you question the correctness of your personal data (in this case the PPE Kft. restricts the data processing for the period until it checks the correctness of the personal data);
- the data processing is unlawful, and the affected objects to the deletion of the data, and instead requests the restriction of their usage;
- the Data Controller is no longer in need of the personal data for the purpose of data processing, however, the affected requires them for the purpose of the submission, enforcement or protection of legal interests; or
- the affected protested against the data processing (in this case the restriction regards the period until it is determined whether the rightful interests of the Data Controller enjoy privilege against the rightful interests of the affected).

### 7.4 Right to protest

You may protest against the data processing regarding the data processing based on the rightful interests of the PPE Kft. (point 3. d)) through the contact given in chapter 10., in case according to your opinion the PPE Kft. would not process your data accordingly in relation to the purpose indicated in this privacy notice. In this case the PPE Kft. must verify that the processing of personal data is justified by compelling rightful reasons that enjoy privilege against the interests, rights and liberties of the affected, or are related to the submission, enforcement or protection of legal claims of the affected.

### 7.5 Right to deletion (“right to make forget”)

In case you request the deletion of one or all of your personal data, the PPE Kft. deletes it/them without undue delay, in case:

- the Data Controller is no longer in need of the given personal data for the purpose of which it collected or in any other way processed it;
- the data processing in question was based on your approval, however, you have revoked the approval and the Data Processing has no other legal base;
- the data processing in question was based on the rightful interest of the Data Controller or a third party, however, you protested against the data processing, and – excluding the protesting against the data processing for the purpose of direct marketing – there is no privileged cause for data processing;
- the Data Controller processed the personal data unlawfully; or
- the deletion of personal data is required for the fulfillment of a legal obligation.

In case the Data Controller has shared the personal data affected by this right with other parties, as addressee (eg. processor), the Data Controller immediately informs these parties following the deletion, provided that it is not impossible or does not require disproportionate effort from the Data Controller. Upon your request, the Data Controller shall inform you of these addressees. The Data Controller is not always obliged to delete personal data, expressly eg. in case the data processing is required for the submission, enforcement or protection of legal claims.

## 7.6 Right to data portability

In case of data processing based on your approval (point 3. a) and e)), and data processing based on contractual obligations (point 3. b)), you are entitled to receive the personal data relating to you and given to PPE Kft. by you in an articulated, widely used, machine-readable format, furthermore you are entitled to forward this data to another data processor without hindering PPE Kft. in the data processing operations performed in an automated mode.

Your request submitted to the PPE Kft. for the purpose of exercising the above mentioned rights will be reviewed and you will receive an answer within one month in accordance with the GDPR.

## 8. Addressees and categories of addressees of the personal data

The PPE Kft. will not forward your personal data to another addressee.

## 9. How do we keep your personal data secure

We recognize our responsibility to protect the information you provide to us. PPE Kft. takes appropriate technical, organizational, and legal steps to protect job application information, including secure servers, firewalls, and encryption of application data.

## 10. Contact us

Please feel free to ask us questions concerning our Privacy Notice for Recruitment, request a copy of your Data or to access, delete, correct or update your Data or withdraw your consent for processing of your personal Data or certain categories of data (see above) or if you want to address any safety and security related requests, to our Data Protection Officer at the address below:

PRO PATRIA ELECTRONICS Mérnöki Fejlesztő és Szolgáltató Korlátolt Felelősségű Társaság

Head office: 1097 Budapest, Könyves Kálmán körút 12-14. floor 3

Phone No.: +36-1-322-7010

E-mail address: [info@propatria-inc.com](mailto:info@propatria-inc.com)

## 11. Right regarding the submission of a complaint on data processing and legal remedy

You also have the right to make a complaint to the national supervisory authority for personal data processing or to take legal action as provided by the GDPR.

In addition to this, if you consider that your rights are infringed, you may take legal actions at the tribunal competent at the head office of PPE Kft., as defendant, or – subject to your choice - at the tribunal competent at your place of residence or place of abode.

Thus, if you are not satisfied by the way we process your Data or the response received by us on any request from your side, you have the right to request an investigation by sending a report to the Hungarian National Authority for Data Protection and Freedom of Information.

Full details regarding the language requirements and the form of the complaint may be accessed on the complaints section of the Hungarian National Authority for Data Protection and Freedom of Information's website: [<https://www.naih.hu/panaszuegyintezes-rendje.html>] and the contact details for submission of a complaint are as follows:

ADDRESSEE: Hungarian National Authority for Data Protection and Freedom of Information;  
address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C, Hungary, mail address: 1530 Budapest, P.O. Box 5, fax + 36-1/391-1410, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) TELEPHONE NUMBER + 36-1/391-1400

This Privacy Notice has been prepared in Hungarian and English languages. In case of any discrepancy the terms of the Hungarian version shall prevail.