

## **Privacy Policy**

This document contains information from **Cheppers Zrt. (hereinafter referred to as Controller)** regarding the processing of personal data in relation to the job advertisements posted by them.

This information material has been prepared pursuant to the Data Protection Regulation of the European Union (Regulation (EU) No. 2016/679 hereinafter referred to as Regulation).

Our contact details:

*Address:* Szent István körút 22, 1137 Budapest, Hungary

*Email address:* info@cheppers.com

*Phone number:* +3630 5877859

### **1. Scope, legal ground, purpose and duration of processing Scope of processing**

Processing in relation to a job advertisement.

#### **Legal ground and purpose of processing**

Pursuant to Article 6(1) of the Regulation, the legal ground for the processing is Your voluntary consent.

The purpose of the processing is that the Controller can conduct the workforce recruitment process and hire an employee for a vacant position.

#### **Scope of processing**

Data disclosed in the CV, name, contact details of the applicant (email address and phone number).

#### **Duration of the processing**

After the end of the application process, data are basically processed until the end of the trial period. During the trial period, the purpose of processing applies, because the Controller will select a new candidate from the previous applicants if the employment terminates.

**We will not forward your data to third persons, they will remain with the Controller only.**

## **2. Your rights regarding the processing**

During the duration of processing, You have the following rights, pursuant to the provisions of the Regulation:

- access to personal data and processing information,
- right to rectification,
- right to restriction of processing,
- right to erasure,
- right to object,
- right to portability.

If You wish to exercise Your rights, then it implies Your identification and the Controller will, necessarily, communicate with You. Identification will therefore require You to disclose Your personal data (such identification may however be based on such data of Yours that the Controller is already processing) and Your complaint in connection with the processing will be available in the email inbox of the Controller during the period indicated for complaints.

The Controller will respond to complaints concerning the processing within 30 days at maximum.

### **The right to withdraw the consent**

You are always entitled to withdraw Your consent to the processing; in such a case, we will erase data provided by You from our systems.

### **Access to personal data and information.**

You are entitled to get a response from the Controller regarding the fact whether Your personal data are being processed; if there is processing, then You are entitled to:

- access the personal data processed and
- notify the Controller of the following information:
  - purposes of the processing;
  - categories of Your personal data processed;
  - information regarding the recipients or recipient categories to whom the Controller has communicated or will communicate the personal data;
  - planned duration of storing personal data, or, if this is not possible, the criteria for determining such a period;
  - Your right that You might request the Controller to rectify, erase or restrict the processing of Your personal data, and, if the processing of data is carried out for a legitimate interest, You may object against the processing of such personal data;
  - the right to lodge a complaint with a supervisory authority;

- if data have not been collected from You, then all available information on their source;
- the existence of automated decision-making (if such a procedure is applied), including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for You.

The purpose of exercising these rights may be to establish and control the lawfulness of the processing; therefore, if information is requested multiple times, the Controller may charge their reasonable costs for providing such information.

The Controller provides access to personal data by sending You the processed personal data and information via email after identifying You.

In your request, please indicate whether you would like to access personal data or request processing information.

### **Right to rectification**

You are entitled to have Your inaccurate personal data immediately rectified by the Controller at Your request.

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

You are entitled to have processing restricted by the Controller if any of the following applies:

- You are disputing the accuracy of the personal data; in such a case, the restriction shall apply to the period during which the Controller can check the accuracy of the personal data;
- processing is unlawful, and You are against the erasure of data; instead, You are requesting the restriction of their use;
- Controller does not require the personal data anymore for the processing specified; however, You require them for the establishment, exercise or defence Your legal claims, or
- You have objected to processing but the legitimate interest of the Controller may provide grounds for the processing, in this case, processing must be restricted until it is verified whether the legitimate grounds of the Controller override those of You.

Where processing has been restricted, such personal data shall, except for storage, only be processed with the data subject'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 reasons of important public interest of the Union or of a Member State.

The Controller shall inform You in advance if the restriction of processing is lifted (at least 3 working days prior to the lifting of the restriction).

### **Right to erasure, be forgotten**

You shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay where 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 by the Controller;
- You withdraw Your consent on which the processing and there is no other legal ground for the processing;
- You object processing based on legitimate interest and there are no overriding legitimate grounds (i.e. legitimate interest) for the processing;
- the Controller has processed the personal data unlawfully, and this has been established based on a complaint;
- the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject.

Where the controller has made Your personal data public for any lawful reason, and is obliged pursuant to any of the reasons given above to erase such personal data, then they, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the data that You have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

Erasure shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for the establishment, exercise or defence of legal claims.

### **Right to object**

You shall have the right to object, on grounds relating to Your situation, at any time to the processing of personal data concerning You which is based on a legitimate interest. The Controller shall no longer process the personal data unless they demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of You or for the establishment, exercise or defence of legal claims.

## **Right to portability**

If processing is carried out by automated means or is based on Your voluntary consent, then You have the right to request the Controller to provide You with the data You previously provided to the Controller, and the Controller shall provide You with such data in xml, JSON or csv format, if this is technically feasible, then You may also request that the Controller forwards such data in this format to other Controller(s).

## **Legal remedies**

If, in Your opinion, the Controller has violated any statutory regulation on data processing or has failed to perform a request, then, in order to terminate the presumed unlawful processing, You may initiate the inspection procedure of the National Authority for Data Protection and Freedom of Information (mailing address: 1530 Budapest, Pf.: 5., email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)). Please be further informed that, if statutory provisions for data processing are violated or if the Controller has failed to perform any of Your requests, then You may file a civil lawsuit at a court.

### **3. Data security**

During the operation of IT systems, the necessary access management, internal organisation and technical solutions ensure that your data do not get into the possession of unauthorised persons; unauthorised persons cannot delete, export or alter data in the system. We enforce data protection and data security requirements against our data processors as well. We keep records of every potential data protection incident; we shall inform You of any incidents, if necessary.

### **4. Miscellaneous Provisions**

The Controller reserves the right to modify this Privacy Policy in a manner not affecting the purpose and legal grounds of the processing. With Your using the website after the amendment takes effect, You shall accept the amended Privacy Policy.

If the Controller wishes to process collected data for purposes different from the purpose of collection, then, still before any additional data processing, they shall inform You of the purpose of processing and the following:

- duration of storing personal data, or, if this is not possible, criteria for determining this period;
- Your right that You may request the Controller to provide access for You to Your personal data, rectification, erasure or restriction of the processing thereof, and, in case of processing based on legitimate interest, You may object the processing of personal data, and, in case of processing based on consent or a contract relationship, You may request that the right to data portability is ensured for You;

- in case of processing based on consent, the fact that You may at any time withdraw Your consent,
- Your right to submit a complaint to the supervisory authority;
- the fact whether providing personal data is based on the law or contractual obligation or is a prerequisite to concluding a contract, and whether You are obliged to disclose Your personal data, and what potential consequences non-disclosure of data might imply;
- the existence of automated decision-making (if such a procedure is applied), including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for You.

Data processing may only start thereafter; if the legal ground for processing is a consent, then You also must consent to the processing in addition to the information.

This Privacy Policy is valid from 25 May 2018.