

PRIVACY NOTICE

(Annex 4 to the Data Protection Regulation)

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1. Data controller data

Name of the data controller: **SWICON Trading and Services Company Limited by Shares**

Registered office: **1031 Budapest, Záhony utca 7.**

Phone: +36 (1) 883-9860

Email: adatvedelem@swicon.com

Website: <https://swicon.com>

Company registration number: **01-10-046053**

Name of the Data Protection Officer:

Madarassy Law Office

Email address: office@madarassy-legal.com

The Data Protection Associate: **László Tündik**

2. Purpose of the notice

The purpose of this privacy notice is to provide data subjects (in this case, jobseekers) with information about the processing of their personal data in a clear and comprehensible way.

The collection and storage of personal and special data, the transmission of personal data to third parties, and any other data management activities are carried out in such a way that unauthorized person(s) do not have access to it.

In conducting our data processing activities, we pay particular attention to the spirit and the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the GDPR 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 (General Data Protection Regulation).

3. General purpose of data processing

The purpose of data management is to manage the recommendations of users of the <https://talentbee.swicon.com> system.

4. Data processed

4.1 Talentbee recommendation system

Concerned parties: The employees and partners of Swicon Zrt who have registered in the Talentbee recommendation system and the recommended persons.

Purpose of processing: sending information or marketing content

Activitiy	Data type	Legal basis	Target	Guarding time
Registration	Name, email address, Region	Submit quality recommendations	Minőségi ajánlások benyújtása	Until registration is terminated (revocation of consent)

The data management process:

Current and partners of Swicon Zrt can register in the Talentbee system. Registration is voluntary. Registration gives you the opportunity to recommend friends by sharing job posts on the swicon.com job portal via a unique link. The recommended person can use the unique link provided by the recommender to reach the public job advertisement on <https://swicon.com>, where they can submit their application by accepting the data protection information applicable there. When the recommender applies with the unique link, the person of the recommender is stored in the candidate management system, thus providing the recommender with the financial benefits associated with the recommendation.

5. Data security

We have put in place technical and organizational measures and procedures to ensure the security of the personal data we process.

Appropriate measures are taken to protect the data against unauthorized access, alteration, disclosure, deletion or destruction, accidental destruction or damage, and loss of access due to changes in the technology used.

Personal data is only accessed by our employees who need to know it in order to perform their duties.

For data security

- assess and take into account potential risks in the design and operation of the IT system, with a view to continuously reducing them
- monitor emerging threats and vulnerabilities (e.g. computer viruses, computer intrusions, denial of service attacks, etc.) to take timely action to avoid and prevent them
- protecting IT assets and paper-based information against unauthorised physical access and environmental impacts (e.g. water, fire, electrical surges)
- monitor our IT systems to detect potential problems and incidents
- we take great care to train staff in information security and raise awareness
- reliability is a key criterion in the selection of service providers

6. Transmission, transfer of data

The Data Controller's activities are specifically aimed at transferring or transmitting the personal data of applicants (and the CVs and related documents containing them) to other data controllers (primarily potential employers).

The members of the SwiconGroup group of companies primarily provide IT operational and administrative support services to Swicon Zrt., in the course of which they can gain access to the data processed and are therefore considered data processors:

ITIL-PRO Ltd., 1031 Budapest, Záhony utca 7., Tel: +36 (1) 883-9866., Company registration number: 01 09 739887

For data protection issues, both of the above organisations can be contacted via Swicon Zrt.'s data protection contact details: privacy@swicon.com, Tel: +36 (1) 883-9860.

In principle, the data may be accessed by service providers involved in the operation of our systems concerned and in the provision of telecommunication lines.

7. Rights of data subjects

Everyone concerned has the right to:

- To be *informed* of the processing concerning him/her before it starts (by means of this privacy notice).
- *Have access to* all information concerning the processing of personal data concerning them
- Request *the correction of* incorrect, inaccurate or incomplete data
- Request *the erasure* (forgetting) of your personal data
- Request *restriction of* processing
- *Object* to the use of your data in certain cases, for example for marketing purposes
- *Right of redress* against data processing

These rights can be exercised by the data subject in writing using the contact details provided in point 1 or in person by prior arrangement. We will endeavor to respond to all requests as soon as possible, but not later than 15 working days.

Contact information for the exercise of rights:

- By mail: 1031 Budapest, Záhony utca 7. addressed to Swicon Zrt
- By email: privacy@swicon.com
- In person: By appointment at +36 (1) 883-9860.

We are unable to release information related to personal data over the phone, as we cannot identify the caller.

In the event of a breach of their rights, data subjects can turn to the National Authority for Data Protection and Freedom of Information

Address: 1055 Budapest, Falk Miksa utca 9-11.

Address for correspondence: 1374 Budapest, Pf. 603.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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

e-mail: ugyfelszolgalat@naih.hu