

PRIVACY NOTICE
ABOUT PROTECTING THE PERSONAL DATA OF JOB APPLICANTS

Nova Human Resources Korlátolt Felelősségű Társaság (1095 Budapest, Soroksári út 30-34.; trade registry number: 01-09-351983), as controller (“**Company**” or “**Controller**”, and also as the operator of the www.novahr.hu website) is dedicated towards observing the governing privacy rules and provides the legally prescribed protection to people who apply for the jobs mediated by the Company (“**Data Subject**” or “**Applicant**”).

The purpose of this notice (“**Notice**”) is to provide the Applicants with detailed information on all essential facts related to processing their data, in particular on the purpose and the legal ground of data processing, on the persons authorized to data control and data processing, on the period of data processing as well as on who is authorized to access the data in compliance with the General Data Protection Regulation No. 679/2016 (“**GDPR**”) of the European Union and Act No. CXII of 2011 on Informational Self-Determination and the Freedom of Information (“**Info Act**”).

This Notice is effective from 25 May 2018 until further notice or until withdrawal.

Representative of the controller Company:

Andrea Janniczky, managing director; Szabolcs Jordán, managing director

Contacts of the controller:

address: 1095 Budapest, Soroksári út 30-34.

e-mail: info@novahr.hu

telephone number: +36 1 770 0931

1. DATA SUBJECTS

The personal scope of the Notice covers everybody who applies for public job ads mediated by the Company through the www.novahr.hu website run by the Company or at other contacts, or who apply for the job ads of Business Partners (advertisers) pertaining to the Company’s customers in general terms, in order to find work, for the purpose of recruitment or to take jobs that are not offered publicly. By submitting their applications to the Company, the Applicants simultaneously accept the provisions of this Notice and agree to processing their data in compliance with this Notice. The Company ensures that the Applicants can access - before the application - the contents of the Notice through the application channels set up by the Company and used upon the search. In the event where the Applicants send their job application through a channel other than the one set up by the Company and used upon the search and the Company finds that - for this reason - they probably did not access this Notice, the Company informs the Applicant about the Notice before accepting the application and requests conformation of its acceptance.

2. INTERPRETATION

In this Notice the below mentioned terms shall carry the following meanings:

“personal data”: means any information relating to an identified or identifiable Employees; an identifiable Employee 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 to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“data 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 employer as well as the natural or legal person or any other body which, alone or jointly with others, determines the purposes and means of processing personal data;

“data processor”: means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

“data protection incident”: a violation of security that results in incidental or unlawful annihilation, loss, change, authorized publication of, and unauthorized access to transferred, stored personal data or data processed in another manner;

“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. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall 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 authorized to process personal data;

“consent by the Data Subject”: means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him/her;

“special data”: Personal data revealing 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 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 data on the provision of health care services to the natural person which reveal information about his or her health status;

“data transfer”: means ensuring access to the personal data for a recipient;

“data protection incident”: a data protection incident means the violation of security regarding personal data processing that results in incidental or unlawful annihilation, loss, change, unauthorized publication of, and unauthorized access to transferred, stored data or data processed in another manner.

“enterprise group”: the controlling enterprise and the enterprises controlled by it; for the purposes of this Notice, the enterprise group means the Company and its controlling companies. Other terms specified by the GDPR are set forth in article 4 thereof.

3. DATA PROCESSING ACTIONS

3.1. DATA PROCESSING RELATED TO MARKETING

a.) DATA PROCESSING RELATED TO SENDING NEWSLETTERS

The Data Subjects can subscribe to the newsletter before or upon using the (recruitment) services provided by the Company or in another manner, with their below specified data. Upon subscription to the newsletter, the Company also records the date of subscription and the IP address at the date of subscription. The Company sends a confirmation e-mail to the address from where the newsletter was requested about the subscription to the newsletter for the purpose of identification and to prevent abuse.

The legal ground of data processing: Subscription to the newsletter is based on voluntary consent. The Data Subject is not obliged to give consent to data processing: Should the Data Subjects not give their consent to data processing, it has the following consequences: they will not receive the Company's newsletters and informative, commercial letters.

Data Subjects: all natural persons and natural persons acting on behalf of legal entities, representatives of such Customers who wish to be regularly informed about the Company's news, therefore they subscribe to the newsletter service by supplying their personal data.

The purpose of data processing: The purpose of data processing related to sending newsletters is to inform the Data Subjects about the Company's latest events, news, promotions and services.

The scope of the processed data	the purpose of data processing
The scope of the processed data name	the purpose of data processing identification
e-mail address	sending newsletters
IP address	identification, technical operation
telephone number	identification
date of subscription	identification, technical operation

Who can access the data: The newsletter is sent exclusively by the staff of the Company's Marketing and PR department through the HR newsletter sending software.

The period of data processing: Until erasure upon request by the Data Subject, i.e. until withdrawal of the Data Subject's consent. The Company may process the personal data obtained for this purpose only until the Data Subject unsubscribes from the newsletter list. The Controller revises the newsletter list every three years and requests confirmation consent to sending the newsletter after three years. The Controller erases the data of those Data Subjects who fail to give the confirmation consent.

The Company informs the Data Subjects that they may unsubscribe from the newsletter at any time at the contacts indicated in the newsletters and via a cancellation request sent to the info@novahr.hu e-mail address. You can unsubscribe from the newsletter via mail at the address given in this Notice.

B.) DATA PROCESSING RELATED TO SOCIAL SITES

The Company is also available at Facebook and other social sites (linkedIn). The primary purpose of the contents placed at these sites is to present the Company’s activities, structure, job opportunities, company-related novelties as well as to share, publish and market the website contents at the social sites. With the help of the social sites the Data Subjects can receive information about the latest positions and the Company’s eventual novelties.

In the course of its activities the Company may process the names and the public data of the Data Subject users registered at Facebook/Google+/Twitter/Linkedin/Pinterest/Youtube/Instagram etc. who like the Company’s social site at these social sites in order to share, like and promote various content elements, products, promotions of the social site, or the social site itself. The Company communicates with the Data Subjects at the social sites - and thus the purpose of the circle of the processed data becomes essential - exclusively when the Data Subject contacts the Company at this forum, i.e. at the social site.

The legal ground of data processing: Establishing and maintaining contacts with the Company at, within and through the social sites and other operations permitted by the social sites are based on voluntary consent. The Data Subjects give their voluntary consent to follow and like the Company’s contents based on the terms and conditions of the social site.

Scope of the Data Subjects: natural persons who follow, share or like the Company’s social sites or their contents.

The scope of the processed data	the purpose of data processing
name	identification
public data	identification
message	keeping contact
e-mail address	keeping contact

The Company may connect the given social site with other social sites under the rules relevant to the given social site. The Data Subjects can find information at the given social site about data processing at the given social site, about the source of data and their processing as well as about the manner and the legal ground of transfer. The relevant data are processed at the social sites, therefore, the period and manner of data processing as well as the option to erase and modify the data are governed by the rules of the given social site.

The Company also publishes images/video recordings at its social site, especially on Facebook about various events, about the Company’s services etc. The Company may connect the Facebook site with other social sites under the rules of the facebook.com portal, thus publication on Facebook shall also mean publication at such connected social media portals.

The Data Subjects may receive information at the given social site about data processing at the relevant social site.

The period of data processing: Until erasure upon request by the Data Subject.

3.2 ESTABLISHING CONTACT AND REQUEST FOR INFORMATION

Establishing contact, requesting and providing information at the www.novahr.hu website or through the a.m. contact addresses.

Through the website the Data subjects can contact the Company and can request information from the Company by providing certain data. The future Customers of the Company can directly contact the employee assigned by the Company to keep contacts. Using the customer contact point requires acceptance of this Privacy Notice.

The circle of Data Subjects: natural persons who contact the Company and request information from the Company by providing their personal data, as well as the natural contact persons of business customers.

The purpose of data processing: establishing and keeping contacts, providing and requesting information.

The legal ground for data processing: the voluntary consent of the Data Subject.

The scope of the processed data	the purpose of data processing
name	identification
address	identification
telephone number	establishing and maintaining contacts
e-mail address	establishing and maintaining contacts
date of message	identification
subject matter and text of the message	giving response, providing information
other personal data provided by the Data Subject	giving response, providing information

The period of data processing: the time needed for data processing, which may be at most 5 years calculated from the data supply or the deadline set for enforcing eventual claims, but at most until withdrawing the consent.

3.3. PROCESSING DATA FOR JOB APPLICANTS

The Data Subjects may submit their application (CV, motivation letter etc.) and other personal data by registering at the www.novahr.hu website or electronically or by mail through other contacts of the Company for the positions or jobs offered there.

Upon the selection process the Controller compares the applications with the vacancy to be filled and with the other conditions of establishing the employment/other legal relationship and invites the most suitable applicants for a personal interview based on the comparison. The selection process is continued with a personal or telephone interview and, in certain cases, by completing a test. The selection is ended by forwarding the data of the most suitable Data Subject to the advertiser.

The source of data: The processed personal data mainly come from the Data Subjects, however, if the Data Subjects note that where they give the data of a third person upon the job

application (e.g. they give a third person for reference), they may give the third person’s data with the prior consent of that third person so they declare to hold the proper authorization for supplying the third person’s data.

The circle of Data Subjects: All natural persons who apply for the job advertised by the Controller.

The legal ground for data processing: the Applicant’s voluntary consent. If the Applicants do not agree to processing their personal data, the Company cannot assess their job application. The Applicants may withdraw their consent to data processing at any time, without affecting the lawfulness of data processing carried out based on the consent before the withdrawal.

In the event of recruitment, the legal ground of data processing after the unsuccessful assessment of the job application – if the Applicant gave no consent to further enquiries - is the Controller’s rightful interest (description of the rightful interest: rightful interest to the payment of remuneration for the provided services).

The circle of the processed data: The Company processes the following data of the Applicants: all data given by the Applicant in their application/CV, thus specifically:

The scope of the processed data	the purpose of data processing
name	identification
address	identification
telephone number	establishing and maintaining contacts
e-mail address	establishing and maintaining contacts
photo	identification
position applied for	identifying the application
list of former work experience	needed for assessing the application and selecting the associate with proper competence
qualification	needed for assessing the application and selecting the associate with proper competence
foreign language skills	needed for assessing the application and selecting the associate with proper competence
special data: e.g. health data, medical data of persons with a changed working capacity	special data are processed only if it is required for filling the vacancy
other data indicated in the submitted CV	needed for assessing the application and selecting the applicant with proper competence
sent motivation letter	needed for assessing the application and selecting the associate with proper competence

salary demand	needed for assessing the application
Data controller's notes, comments	needed for assessing the application

The general purpose of data processing: The Company stipulates that the Applicants' personal data are mainly processed for the following purposes: recruitment; keeping contacts. Another indirect purpose of personal data processing is to assess the professional skills of the Applicants for the advertised position and in order to contact the Applicants with a specific, customized offer.

Transferring personal data: Depending on the applicant's consent, potential employers or other employers or hirers, cooperatives about whom Nova Human Resources Kft. informs the Applicants individually, in advance. Processing the data of the recipient of data transfer is based on the information to be provided by the recipient.

Data transfer: The Company transfers the personal data of the Applicants to those Customers whose ads are mediated or for whom workforce is recruited (advertisers). Data are transferred only with the Applicants' express, prior, well-informed consent. The application/CV of the Applicants, the information and data checked with the Applicants upon establishing contact as well as the result of the personality test and the employers'/advertisers' professional test, also checked with the Applicants who meet the employers'/advertisers' preferences are transferred by the Company to the employer/advertiser indicated upon requesting the consent.

The period of data processing: Contacts for data processing: the Company processes the data of non-recruited Applicants for 2 years after submitting the application so that in the case of a position similar or identical with the job that the Applicant applied for and that opens at a later date the Company can assess whether the Applicant has suitable competences and, if justified, it can contact the Applicant. If the Company itself employs the Applicant, the data of the recruited Applicant are later processed based on the Company's privacy notice relevant to employees.

3.4. TRAINING, EVENTS

Data processed in connection with training held, or events organized by the Company.

The legal ground of data processing: Consent by the Data Subject.

The circle of Data Subjects: All natural persons who intend to participate in education, training and events organized by the Company by supplying their data voluntarily.

The scope and purpose of the processed data:

The scope of the processed data	the purpose of data processing
name	identification
address	identification,
telephone number	establishing and maintaining contacts
e-mail address	establishing and maintaining contacts

photo	identification
position	identification
invoicing address	required for issuing the invoice
date of application/event	identification, claim enforcement

The purpose of data processing: enabling the application, identifying the Data Subjects and verifying their authorizations as well as keeping contacts.

The activities and processes affected by data processing: the Data Subjects notify the Controller about their intention to attend the education or training in the manner provided or made available by the Controller, thus specifically via order at the given e-mail address or on the telephone by providing their above specified data and sending them to the education staff of Nova Human Resources Kft. The intention to participate is manually entered into the electronic registration system set up for this purpose and/or it is recorded on paper. The Controller may make the participation in education or training subject to fulfilling specific conditions (e.g. fee payment).

The Company may make video and image recordings about the participants of the events and the Data Subjects as participants agree to use the recordings by the Company for marketing purposes by accepting the registration link of the event. The Data Subjects may prohibit - with a separate declaration - the further use of the image and video recordings made about them.

The period of data processing: with regard to data for identification and keeping contacts until the lapse of the enforceability of the rights and obligations arising from the legal relationship for which the Controller processes the personal data, while with regard to data underlying accounting documents (invoicing data) the data processing period is at least 8 years from fulfilment based on the legal regulations.

3.5. PROCESSING THE VISITOR DATA OF THE WWW.NOVAHR.HU WEBSITE

When entering the website, certain data generated upon the visit may be technically recorded automatically at the server of the website. The automatically recorded data are logged by the system automatically upon entry and exit, without any special declaration or action by the Data Subjects. The system processes these data for the shortest period needed for providing the service and for safe operation - typically for less than 3 days - afterwards the data are overwritten, i.e. erased. Thus, e.g. the following data may be stored: IP address, browser data, visit parameters.

The purpose of data processing: upon visit to the website, the storage space provider records the visitor data in order to check the operation of the service and to prevent abuse.

The legal ground for data processing: the voluntary consent of the Data Subject

<u>The scope of the processed data</u>	<u>the purpose of data processing</u>
<u>date of visit</u>	identification
<u>IP address</u>	identification
<u>address of the visited page</u>	identification, preventing abuse
<u>browsing history</u>	identification, preventing abuse
<u>Data related to the Data Subject's operation system and browser</u>	identification, preventing abuse

The period of data processing: 3 days from viewing the website.

3.6. COOKIES AND THEIR PROCESSING

The www.novahr.hu website and the site's external partners use cookies and similar technologies when the visitors and the registered users use the website from a computer, tablet or mobile phone. The basic purpose of using cookies is to provide certain basic functions of the website, to improve and customize the user experience, to display appropriate, customized ads and offers as well as to collect statistical data in order to enhance further service development.

The cookie is an information package, generally a small size text file containing an individual ID and stored on the user's PC or mobile device. The cookie is placed on the user's device by the visited website itself for identification, thus the device used by the user can be recognized when a certain website is visited.

In the below table the www.novahr.hu website summarizes the cookies that are used when the visitors open the website and browse the pages.

a.) COOKIES STRICTLY NECESSARY FOR OPERATING THE WEBSITE

Such cookies are indispensable for proper website operation. Without accepting these cookies the Company cannot guarantee the proper operation of the website and that the users will access all information searched by them. The data stored by these cookies do not "collect" personal data for marketing, analytics etc., they are exclusively needed for the basic operation of the website.

Cookie description	Cookie features
CookieConsent	<p>The purpose of data processing: Ensuring the proper operation of the website</p> <p>Period: Period until closing the relevant visitor work session / 1 year</p> <p>Created by the www.novahr.hu website</p>

b.) COOKIES FOR MARKETING

Behaviour-based, personal and anonymous data are collected and analyzed so that the website can publish ads that are interesting to the users and the Controller can recognize which part of its application or website is used by the users and in what manner.

Cookie description	Cookie features
	<p>The purpose of data processing: Ensuring the proper operation of the website</p> <p>Period: Period until closing the relevant visitor work session / 1 year</p> <p>Created by the www.novahr.hu website</p>

c.) UNCLASSIFIED COOKIES

Unclassified cookies are still to be classified, together with the providers of individual cookies.

Cookie description	Cookie features
	<p>The purpose of data processing: Ensuring the proper operation of the website</p> <p>Period: Period until closing the relevant visitor work session / 1 year</p> <p>Created by the www.novahr.hu website</p>

SETTING THE COOKIE USAGE IN THE BROWSERS

The Controller draws the attention of the users that some internet browsers automatically accept the cookies but the Data Subjects have the opportunity to enable, erase or automatically reject them by setting or modifying the programme of the computer browser. If you do not agree to use the cookies, certain functions of the Website may not be used in full. Information and help for managing cookies in the browser are available on the “help” platforms of the browsers.

SETTING THE COOKIE USAGE AT THE WEBSITE

After logging to the www.novahr.hu website the Controller provides information about cookie management in a pop-up window, where the user must give consent to the cookie management procedures of the site. When giving consent, the Data Subject can select which cookie types they agree to manage by ticking the button before the cookie type or by removing the tick.

After accepting the cookie management, the Data Subject can at any time change or modify their consent to cookie management at the site by clicking on the “Cookie management” link in the footer.

LINKS TO OTHER, EXTERNAL WEBSITES

The website may also contain links that lead to pages that are not run by the Controller, they only provide information to the Data Subjects (“cross-linking”). The Controller is not responsible for the contents and the security of websites run by these companies so it is not responsible for them. The Company requests the Data Subjects to check the Privacy Notice and the privacy statement of these sites before providing their data on the given pages in any form.

4. DATA SECURITY

The Company takes the following actions to ensure the security of personal data processed on paper:

- the documents are stored in a lockable, dry room protected against unauthorized access through technical and human protection and, within this, in a lockable cabinet;
- the Employee processing personal data may leave the room where the data are processed and the documents are stored by locking the documents containing personal data entrusted with him/her and by locking the office if there are no other Employees in the office;
- documents containing personal data can only be forwarded in a closed envelope, bearing the inscription “bizalmas/confidential”;

The Company takes the following actions to ensure the security of personal data stored on a PC or in a network:

- data located on a PC may only be accessed by persons authorized to access and carrying valid, personal and identifiable authorization (at least with a user name and a password);
- data stored on the Company’s central server may only be accessed by persons with appropriate authorization;
- the Company shall provide for regular cloning/backup with short storage period with a view to protection against data loss;
- the Company provides for regular IT boundary protection (protection against viruses, excluding unauthorized external access) by running advanced security applications;
- digitally stored personal data are forwarded between Employees authorized to process data exclusively in a manner that can be monitored (via e-mail or with a network solution that can be controlled based on a logfile);

The persons with access to personal data at the Company are bound by the obligation of confidentiality with regard to the Applicants’ personal data, i.e. they are obliged to process confidentially the personal data and other information accessed when fulfilling their work obligations or accessed in any other manner and they may not make them accessible to third persons. This obligation shall also survive without any time limit after the termination of the employment. The data processing persons shall process the personal data confidentially, they may not use them for their own purposes, they may not publish them, may not transfer them or may not make them accessible to anyone, except for the cases specified in the Notice.

5. PRIVACY INCIDENTS

If privacy or data security incidents are detected, the Company’s employees shall immediately report them to their direct superior and to the data protection officer. The direct superior shall take action to manage and avert the incident and the data protection officer contacts, in a justified case, the managing director with a view to manage the incident. The data protection officer regularly reports to the managing director about all data protection incidents.

If the data protection incident involves a high risk for the rights and freedoms of the Applicant, the Company shall notify the Applicant about the data protection incident without unreasonable delay, within this, specifically:

- the name and the contact of the data protection officer
- the expected consequences of the incident
- the actions planned or taken to solve the incident and to reduce its risks.

The Company registers the privacy incidents, indicates their known impacts and the actions taken.

6. DATA PROCESSORS

The Company uses services by third parties in order to meet the data processing purposes and to fulfil the tasks specified herein, and such services may also include the processing of the Applicants' personal data. These third persons ("**Data Processors**") process data as instructed by the Company and in conformity with the provisions of the effective legal regulations. Only those personal data are forwarded to the Data Processors for the purpose of data processing that are necessary for meeting the given purpose.

Currently, data are processed for the Company with regard to the Applicants by the following service provider:

Name of the data processor: Nova Services Kft.

Address of the data processor: 1095 Budapest, Soroksári út 30-34.

Represented by: János Bacskai, managing director

The purpose of data processing: completing employment-related registration, wage and social security administration tasks before establishing the employment.

7. DATA TRANSFER

The Company declares not to transfer the personal data of the Applicants to third countries, i.e. to countries outside the European Union (or does not make them accessible to data processors operating in a third country). The Applicants note and simultaneously agree that their data are transferred for recruitment within the Nova Company Group, i.e. if the opportunity of employment arises at the customer of another company within the Company Group, the Applicants' personal data are transferred to that company.

8. RIGHTS OF THE APPLICANTS CONCERNING DATA PROCESSING

Rights of the Applicants:

a) right to access

The Applicants have the right to obtain from the Company confirmation as to whether or not their personal data are being processed, and, where that is the case, they may access the processed personal data and receive information about the purpose of data processing, the data categories, the recipients, the period of storage, their rights and the data sources.

The Company shall provide the Applicants with a copy of the personal data undergoing processing. For any further copies requested by the Applicants, the Company may charge a reasonable fee based on the administrative costs.

b) right to rectification and erasure

The Applicants have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning them. With regard to the purpose of data processing, the Applicants are entitled to request extension of deficient personal data, among other things, by way of a supplementary declaration.

c) right to erasure/to be forgotten

The Applicants have the right to obtain from the Company without undue delay the erasure of personal data concerning them. The Applicants may withdraw their consent to data processing by a given deadline, and in this case the data processor may process the data for the purpose of data processing until the given deadline. If the purpose of data processing terminated or the Applicants withdrew their consent to data processing, the data processor shall not continue to process the Applicants' data, and the personal data of the Applicants shall be erased without any further notification of the Applicants, under the rules on scrapping.

d) restriction of data processing;

The Applicants have the right to obtain from the Company restriction of processing where one of the following applies:

- the Applicants dispute the accuracy of the personal data, in this case the restriction shall refer to the period that enables the controller to verify the accuracy of the personal data;
- data processing is illegitimate and the Applicants protest against deleting the data and, instead, they request restriction of their use;
- the Company no longer needs the personal data for data processing but the Applicants need them for submitting, enforcing or protecting legal claims; or the Applicants objected to data processing; in this case, the restriction refers to the period until it is established whether the legitimate grounds of the Company override those of the Applicants.

Where data processing has been restricted based on the above considerations, such personal data shall, with the exception of storage, only be processed with the Applicants' 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 Company notifies all recipients about the rectification, erasure, right to be forgotten or restriction of data processing to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate efforts.

e) right to data portability

The Applicants have the right to receive the personal data concerning them, which they have provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company to which the personal data have been provided if data processing is based on consent and data are processed in an automated manner. In exercising their right to data portability the Applicants have the right to have the personal data transmitted directly from one controller to another, where technically feasible. Exercising the right may not violate the right to erasure. The mentioned right shall not apply in the case where processing is necessary for the performance of a task carried out in the public interest. Exercising the right shall not affect adversely the rights and freedoms of others.

f) the Applicants have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on point (e) or (f) of Article 6 (1) of the GDPR, including profiling based on those provisions. In this case, the Company 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 Applicants or for the establishment, exercise or defence of legal claims. The Applicants have the right not to be affected by the scope of the decision exclusively based on automated data processing, also including profiling, that would impose a legal impact on them or would affect them in a similarly significant manner.

Unless the decision:

- is necessary for entering into, or performance of, a contract between the Applicant and the Company;
- is authorized by a Union or member state law to which the Company is subject and which also lays down suitable measures to safeguard the Applicants' rights and freedoms and legitimate interests; or it is based on the Applicants' express consent.

9. PROCEDURE IF REQUIRED BY THE APPLICANTS

The Applicants may turn with their above claim or with any other question or request concerning their personal data to the representative of the company indicated at the beginning of this Notice, at any of the contacts indicated there or at the central e-mail address of the Company's HR Department: info@novahr.hu.

The Company shall judge the request within 30 days from its receipt submitted in writing. The Company may extend the deadline for judging the request where necessary, taking into account the complexity and number of the requests that are in progress. The Applicants shall be previously informed about the fact of, and the reasons for extension.

If the request of the Applicant is well-founded, the Company takes the requested action within the procedural deadline and notifies the Applicant about the implementation in writing. If the Company rejects the Applicant's request, it shall pass a written resolution about it. The resolution shall specify the statement of facts underlying the decision, the reasons for the decision by presenting the appropriate legal regulations and case by case decisions, furthermore the Company shall notify the Applicants about the opportunities of legal remedy against the Company's decision.

The Applicants may be obliged to refund the costs related to exercising their rights exclusively in the event where the Company informed the Applicants in writing - within 8 days from receiving their request - that their request is exaggerated and information was also given about the rate of the administrative cost but the Applicants maintained their claim despite these circumstances. The claim is regarded as maintained if the Applicants do not revoke their request - despite the information provided by the Company - within 5 working days or by the end of the administrative deadline.

The Applicants obliged to cover the costs shall pay them separately within 8 days from receipt of the payment demand issued by the Company.

Should the Applicants not agree with the Company's decision or if the Company fails the a.m. procedural deadline, the Applicants may turn to the supervisory authority or to court.

10. SUPERVISORY AUTHORITY

If the Applicants find that processing their personal data by the Company violates the provisions of the effective privacy regulations, thus specifically those of the GDPR, they may submit a complaint to the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság).

Contacts of the Hungarian National Authority for Data Protection and Freedom of Information:

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

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Mail address: 1530 Budapest, Pf.: 5.

Telephone: +36-1-391-1400 Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

The Applicants may also submit a complaint to another supervisory authority, especially established in the EU Member State of their usual residence, workplace or at the place of the presumed violation of law.

11. RIGHT TO START AN ACTION (RIGHT TO TURN TO COURT)

The Applicants may turn to court – regardless of their right to submit a complaint – if their rights specified in the GDPR have been violated upon processing their personal data.

A lawsuit may be started against the Company, as a Hungarian controller, before a Hungarian court.

Should the Applicants intend to start a court action against the data processor, it shall be started at the court of the member state where the data processor is registered.

The Employees may start the lawsuit at the court competent according to their permanent or temporary residence. The availability of Hungarian courts can be found through the following link: <http://birosag.hu/torvenyszekek>.

If the Applicants' normal place of residence is in another member state of the EU, the lawsuit may also be started at the court that has power and competence in the member state of the normal place of residence.

The Company reserves the right to unilaterally modify this Privacy Notice at any time, in compliance with the legal regulations.

12. MISCELLANEOUS

The Company reserves the right to modify this Notice. The Notice modified in a consolidated structure is published at the www.novahr.hu website.