

Submission of curriculum vitae

1. Purpose

Information on data processing related to the processing of the personal data of persons applying for a job at Capsys Ltd. or submitting a curriculum vitae.

We kindly inform you in relation to your job application and your curriculum vitae submitted for this purpose to Capsys Ltd. that your personal data are processed by Capsys Ltd., in its capacity as data controller.

2. Data processing

2.1 Data Controller's data

- company name: CAPSYS Informatics Limited Liability Company
- registered office: H-1133 Budapest, Váci út 80. 2nd floor
- company registration number: 01 09 672943
- telephone number: +36 1 436 7230
- e-mail: capsys@capsys.hu

Hereinafter: Data Controller or Capsys Ltd.

2.2 Principal laws applied in the course of the data processing

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

Act V of 2013 on the Civil Code

Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Info Act; Data Protection Act);

Act I of 2012 on the Labour Code

3. Range of personal data involved in the data processing

The data processing affects your following personal data:

- your natural personal identification data (name, birth name, place and data of birth, mother's birth name)
- your curriculum vitae presenting your professional career, including your personal data (educational level, places of employment, professional experience),
- telephone number, e-mail address;
- your other personal data included in your curriculum vitae and application submitted to the data controller (e.g. photo, copies of instruments confirming your educational level and other qualifications)

4. Legal basis and purpose of the data processing

The legal basis of the data processing is the consent given by you (Article 6 (1)a) of the GDPR)

Purpose of the data processing:

- to ensure the identification of the applicants for the job (name, place and date of birth, mother's birth name)
- to contact the applicants (telephone number, e-mail)
- to compare the professional requirements arising in relation to the vacancies and the professional skills of the applicant (educational level, professional experience, copies of the instruments confirming the qualifications)
- to ease the selection of prospective employees with adequate skills and professional experience (professional track record, educational level)
- to formulate initial opinion on your eligibility

The Data Controller processes your personal data only in the current labour force hiring processes, with a view to judging the eligibility of the applicants and making a decision on their hiring.

5. Obtaining knowledge of the processed data, cases of transferring and forwarding such data

In the course of the data processing, the following persons have access to your personal data:

- managing director of the Data Controller;
- managers having competence with regard to the position applied for at the Data Controller;
- the HR manager of the Data Controller;
- the employees performing the specific recruitment tasks.

The Data Controller does not forward your personal data to anybody, with the exception of the cases, stipulated in the laws, when it is obliged to provide data (e.g. upon the request of the competent authorities).

6. Duration of the data processing

If there is no vacancy at the Data Controller at the time when you submit your application, the Data Controller will retain your curriculum vitae and the documents attached to your application, i.e. it will continue to process your personal data, for further 3 months (e.g. because, based on your professional skills, you would be eligible for a position at the data controller, but at present there is only anticipated rather than actual vacancy).

By submitting your curriculum vitae and the attached documents to the Data Controller, you give your consent to the processing of your personal data for the aforementioned 3 months.

We kindly inform you that you may withdraw your consent – even within the aforementioned 3-month period – at any time, by a declaration addressed to the Data Controller, in one of the ways specified below:

- personally, at the address of the Data Controller: H-1133 Budapest, Váci út 80, 2nd floor

- by e-mail sent to capsys@capsys.hu

Upon receiving the withdrawal of your consent, the Data Controller will forthwith erase all of your data. The withdrawal of the consent does not prejudice the lawfulness of the data processing performed earlier based on your consent.

Upon the withdrawal of your consent, or three months after the submission of your job application, the Data Controller will erase your personal data without separate notice.

7. Protection of the processed personal data

When developing the technical and procedural rules for the data processing operations, the Data Controller pays special attention to providing proper physical, administrative and IT protection for your data. The primary objective of the applied measures is to avoid and prevent unauthorised access to and unauthorised modification, transmission, disclosure, deletion or corruption of the processed data. The Data Controller selects the tools and measures applied during the data processing accordingly. Furthermore, the Data Controller ensures that the processed data can be accessed only by the authorised persons and that the authenticity and constancy of the data are guaranteed.

8. Your rights related to the data processing

In relation to the data processing pursued by Capsys Ltd. in respect of your personal data, you have the right to:

- receive proper and transparent information, and within that to receive feedback from the Data Controller whether your personal data are being processed;
- request that your inaccurate personal data should be corrected;
- apply for the deletion of your processed personal data, if the data processing is based solely on your consent, or if the data are no longer necessary for the purpose they were initially collected for, or if the data processing is unlawful;
- exercise your right to data portability, i.e. you have the right to receive the personal data in a structured, commonly used and machine-readable format and to transmit those data or ask for the forwarding of such data to another controller, provided that the data processing is automated, it is based on contract or consent, and the exercise of such right does not prejudice the legitimate interest and freedom of others;
- request that the processing of your personal data should be restricted (e.g. if the accuracy of your processed data is disputed or the data processing may be unlawful, until the clarification of such circumstances);
- object to the processing of your personal data (e.g. if the legal basis of the data processing is the enforcement of the data controller's or a third party's legitimate interest), or to withdraw at any time the consent given earlier,
- turn to the supervisory authority or to the court if the data processing is presumed to be injurious.

8.1 Content of the data subject's individual rights

- a) right of access to personal data: the data subject has the right to obtain from the Data Controller confirmation as to whether or not his personal data are being processed, and if so, to access the following information:
- categories of the processed personal data,
 - purpose of the data processing,
 - the recipients to whom the personal data have been or will be disclosed,
 - envisaged period for which the personal data will be stored, or the criteria used to determine that period,
 - information on the source of the data, where the personal data were collected not from the data subject,
 - the right to lodge a complaint with the supervisory authority,
 - where the data processing includes automated decision-making or profiling, information about the logic involved, as well as the envisaged consequences thereof for you.
- b) right to rectify personal data: the data subject has the right to request the Data Controller that it should, without undue delay, rectify any inaccurate personal data concerning him, or complete the incomplete personal data, including by means of providing a supplementary declaration.
- c) right to erase personal data: the data subject has to right to request the Data Controller that it should, without undue delay, erase the personal data related to him, and the Data Controller is obliged to erase the personal data related to the data subject without undue delay, if:
- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - the data subject withdraws his consent and there is no other legal ground for the processing;
 - the data subject objects to the data processing, and there is no overriding legitimate reason for the data processing; or
 - the personal data were processed unlawfully; or
 - the personal data are to be erased to fulfil the legal obligation applicable to the Data Controller; or
 - the personal data have been collected in relation to offering information society services (e.g. some sort of online marketing, internet lottery).
- There may be important reasons and interests that may permit the processing of the data subject's data even if he objected to this (e.g. for exercising the right of freedom speech and the right information or for submitting, enforcing and defending legal claims).
- d) right to restrict processing: the data subject has the right to request the Data Controller that it should restrict the data processing, if:
- the accuracy of the personal data is contested by the data subject (in this case the restriction will last until such time as the Data Controller verifies the accuracy of the personal data); or
 - the data processing is unlawful and the data subject requests that the use of those should be restricted rather than erased; or

- the Data Controller no longer needs the personal data for data processing purposes, but the data subject needs them for the purpose of submitting, enforcing or defending legal claims; or
- the data subject objected to the data processing (in this case the restriction lasts until such time as it is established whether the legitimate arguments of the Data Controller take priority over the data subject's legitimate arguments);

During the period of restriction – with the exception of the cases related to important public interest or to the protection of personal rights – no data processing operation may be performed other than storage.

- e) right to data portability: the data subject has the right to receive his personal data provided by him to the Data Controller in a structured, commonly used and machine-readable format, to transmit those data to another data controller. The data subject is entitled to this right, if the processing is based on his consent or on a contract and the processing is carried out by automated means. The exercise of the right must not prejudice the rights and freedom of others.
- f) right to object: if the legal basis of the data processing is a legitimate interest that the Data Controller wishes to enforce, the data subject has the right to object to the processing of his personal data at any time due to reasons related to his personal situation. In such case, the Data Controller may not process the personal data any longer, unless the Data Controller proves that the data processing is justified by coercive legitimate interests, which take priority over the data subject's interest, rights and freedom, or which relate to the submission, enforcement or defending of legal claims.

9. Rights to legal remedies

If you believe that your rights in relation to the processing of your personal data by Capsys Ltd. were prejudiced, and we failed to respond to your related requests and comments, or we responded with undue delay or in improper manner, you have the right to apply to the competent supervisory authority.

Data of the competent supervisory authority:

- Name: Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
- address: H-1125 Budapest, Szilágyi Erzsébet fasor 22c,
- e-mail: ugyfelszolgalat@naih.hu
- telephone: +36 1 391 1400

Furthermore, you have the right to seek remedy at the court of justice having competence based on your permanent residence or place of abode, if you believe that the Data Controller processes your personal data in a way that breaches the law or the provisions of the European Union's mandatory legislative act.

We recommend that if you plan to seek remedy at the supervisory authority or at court, you should first obtain information from the Data Controller, since the information related to your questions and requests requiring remedy are available at the data controller.

Our company is committed to implementing the principles of lawful, transparent and fair data processing; accordingly, in the case of presumed breaches we take urgent measures to clarify the issues, and we will notify you on the findings and the measures taken to remedy the injurious situation, and – if you apply to the Data Controller for information – we shall provide you with the requested information you within 1 month from contacting us, at the latest.