



## **RULES OF DATA MANAGEMENT**

**- to enter into force on October 1<sup>st</sup>, 2017 -**

### **1. Purpose of the Rules of Data Management**

Purpose of the Rules of Data Management (hereinafter referred to as “*these Rules*”) is to lay down the rules of data management and data protection to apply at Talentify Co. Korlátolt Felelősségű Társaság (1138 Budapest, Népfürdő utca 22. 15. emelet, Data Controller registration number: NAIH-79622) as being in accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and in line with 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 (“**GDPR**”).

### **2. Definitions**

**Authority** shall mean the National Data Protection and Freedom of Information Authority (in Hungarian: *Nemzeti Adatvédelmi és Információszabadság Hatóság*; postal address: H-1530 Budapest, Pf. 5., Hungary; geographical address: 22/c Szilágyi Erzsébet fasor, H-1125 Budapest, Hungary; web: [www.naih.hu](http://www.naih.hu); phone: +36 1 391 1400; fax: +36 1 391 1410);

**Data controller** shall mean the person who/which either alone or jointly with other person(s) is entitled to determine the purposes of the processing of Personal Data, to make decisions regarding data management and to implement such decisions either himself or through engaging a Data Processor. In the context of these Rules, Talentify Co. Korlátolt Felelősségű Társaság acts as the Data Controller;

**Data processor** shall mean either a natural or a legal person or an unincorporated organisation that is contractually engaged in the processing of Personal Data, including situations where the contract is concluded by virtue of law



**Data subject** shall mean a natural person who has been or can be identified either directly or indirectly by reference to specific Personal Data

**DPA** shall mean Act CXII of 2011 of Hungary on the right of informational self-determination and on the freedom of information governing general data protection;

**Employer** shall mean the natural person or the legal person seeking for new employees by using the services of Data Controller;

**Personal Data** shall mean any information related to the Data Subject, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors being specific on the physical, psychological, mental, economic, cultural or social identity, as well as any reference drawn from such information pertaining to the Data Subject.

### 3. Details of Data Controller

Name:	Talentify Co. Korlátolt Felelősségű Társaság
Company registration No.:	01-09-195679
Seat:	H-1138 Budapest, Népfürdő utca 22. 15. em.
Phone number:	+36 30 821 4369
Contact person	Ms. Diána Börzsei
E-mail address:	<a href="mailto:diana@talentifynow.com">diana@talentifynow.com</a>
Registration number at the Authority:	NAIH-79622

### 3. Details of Data Processors

Name:	Online Üzleti Intelligencia Korlátolt Felelősségű Társaság
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Seat:

6720 Szeged, Kárász utca 9.

Phone number:

+36 (1) 769 0998

Contact person:

Mr. Tamás Goldea

E-mail address:

[goldea@recruito.net](mailto:goldea@recruito.net)

Name:

Google Inc.

Seat:

1600 Amphitheatre Parkway, Mountain View, CA  
94043, USA)

Website address:

<https://www.google.com/contact>

#### **4. Storage of data**

- 4.1 Data Processor provides the technical background for the storage of data based on both its internal regulation and the contract concluded with Data Controller.
- 4.2 Data Controller provides access to any Personal Data whatsoever only for those employees who take part in the procedure of data management.

#### **5. Registration process**

##### **5.1 Natural person (“Job seeker”)**

When registering on the website the Data Subject must disclose the following Personal Data:

Obligatory: full name, date of birth, e-mail address, current location, willingness to relocate, expertise (field, level), CV, and password

Optionally: gender, current salary, nationality, marital status, mobile phone, landline, employers with time period, positions, tasks, leaving reasons, educational institutes with time period, field of studies, spoken languages and levels, online portfolio URL, skype contact, on the following link:

<http://karrier.recruito.net/talentify/index.php/applicant/signup>

- 5.2 At the end of the registration process, the Data Subject shall accept the registration conditions and he/she has the opportunity to upload his/her CV.
- 5.3 In case of individual job applications, the Data Subject has to carefully read and sign the “Declaration on data management” document in which he/she approves

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management of his/her Personal Data as well as indicates further data required in order to fulfill the respective position.

5.4 The Data Controller never requests to provide any special categories of personal data or any data concerning health. For this reason, Data Subjects are requested to refrain from providing or otherwise disclosing such data to the Data Controller.

5.5 Data Subjects are obliged to refrain from providing any data, information or any attachment, document the content of which is illegal, or that would harm the reputation of the Data Controller or, which would affect or infringe rights or interests of third parties.

5.6 Employer

When registering on the website [www.talentifynow.com](http://www.talentifynow.com) Employer must submit the following data: company name, contact person, phone number, e-mail address, user name and password.

## 6. Purpose of the data management

The purpose of data management is

- (i) to select appropriate Data Subjects to fulfill certain positions at the Employers; and
- (ii) to make all prearrangements necessary to decide on establishing the employment relationship with the Employer, such as interviews and assessment of personal preferences.

## 7. Legal basis of data management

The legal basis of data management is the consent of the Data Subject according to the DPA.

## 8. Period of the data management

8.1 Personal Data can be managed on the basis of the written consent of the Data Subject for 1 (one) year following successful recruitment of the Data Subject,



unless he/she withdraws his/her approval within this period, in which latter case data management ceases immediately on the day of withdrawal of the consent.

## **9. Security of Data Processing and data forwarding**

9.1 Both the Data Controller and the Data Processor must implement adequate security measures and technical and organizational respects to protect Personal Data.

9.2 Data Controller has the right to forward Personal Data abroad in accordance with the purpose of the data management only based on the previous consent of the Data Subject. Personal Data will be forwarded beyond the borders of the European Union, including but not limited to state members of the Gulf Cooperation Council (Bahrain, Oman, Qatar, UAE, KSA), only following receipt of the express written consent of the Data Subject. The Data Controller also calls the Data Subjects' attention to the fact that in the above mentioned countries outside the European Union the level of data protection may not be compliance with the data protection laws of the European Union. In the event of forwarding Personal Data outside the European Union, the written consent signed by the Data Subject must include the specific jurisdictions where and the persons (legal entities) to whom Personal Data will be transferred and whether or not the level of data protection in such jurisdictions are in compliance with the data protection laws of the European Union.

## **10. Rights of the Data Subject**

10.1 The Data Subject

(i) may request information from Data Controller in relation to the conditions of Data Processing concerning his Personal Data;

(ii) has the right to request correction of his/her Personal Data; and

(iii) may prohibit data management any time without further explanation, i.e. request deletion or blocking of his/her personal data

via e-mail sent to [europa@talentifynow.com](mailto:europa@talentifynow.com) or via postal mail sent to the seat of Data Controller (H-1138 Budapest, Népfürdő utca 22. 15. emelet).



Upon request, the Data Controller provides information as soon as possible but at the latest within 25 days after the receipt of such a request.

- 10.2 The Data Subject may request deletion of his/her Personal Data and/or his/her whole personal account either via using the recruitment software of Data Controller (Recruito), or via email to [europa@talentifynow.com](mailto:europa@talentifynow.com).
- 10.3 If the personal data is not correct and the data controller has the correct personal data, it will correct it.
- 10.4 Personal data must be deleted if
- its management is unlawful;
  - the data subject so requests;
  - it is incomplete or incorrect and this status may not be cured lawfully - provided that the deletion is not excluded by virtue of law;
  - the purpose of the data management no longer exists or the statutory deadline to store the data has expired;
  - it was ordered by court or the Authority.
- 10.5 Instead of deletion, the Data Controller must block the personal data if it is so requested by the Data Subject or, based on the information at the Data Controller's disposal, it can be assumed that deletion would infringe the Data Subject's lawful interests. The personal data blocked may be managed only until the purpose of the data management, which excludes the deletion of the personal data, exists.
- 10.6 The Data Controller shall highlight the personal data managed by it if the Data Subject challenges its correctness or accurateness but the incorrectness or inaccuracy cannot be clearly ascertained.
- 10.7 The Data Subject and all persons to which the data was previously transferred for the purpose of data management must be notified of the correction, blocking, highlighting and deletion. The notification can be omitted if this does not infringe the rightful interest of the concerned party with regards to the purpose of the data management.



10.8 If the Data Controller does not comply with the data subject's request to correct, block or delete the personal data, it must notify the data subject in respect of the factual and legal reasons of the non-compliance within 25 days after the receipt of such a request. In the case of non-compliance with the request to correct, block or delete the personal data, the data subject may turn to the DPA or to court pursuant to the Privacy Act.

10.9 The Data Subject, may object to the data management relating to his/her personal data

- a) if the data management or transfer is only needed to comply with the data controller's legal obligations or to enforce the data controller's or data transferee's legal interests, with the exception of mandatory data management;
- b) if the use or transfer of personal data serves the purpose of direct marketing, poll or scientific research; and
- c) in additional cases as set forth in acts adopted by the Parliament.

10.10 The Data Controller must check the objection, pass a resolution on the merits and notify the applicant thereof as soon as possible, but at the latest within 15 days after the receipt of the request.

10.11 If the Data Subject, as the concerned party, does not agree with the Data Controller's decision or the Data Controller misses the deadline, the Data Subject may turn to court within 30 days after the receipt thereof or the expiry of the deadline.

10.12 Any person shall have the right to notify the Authority and request an investigation alleging an infringement relating to his or her personal data or concerning the

exercise of the rights of access to public information or information of public interest, or if there is imminent danger of such infringement.

## 11. Amendment to these Rules

11.1 Data Controller has the right to amend these Rules, in line with the prevailing data protection laws of Hungary and the European Union. In case of any amendment,



# Talentify

The Talent Management Company

Data Subject will be informed in due time either via e-mail or on the website enabling the Data Subject to complain about any eventual unlawful data management concerning his/her Personal Data, and in order to enable the Data Subject to give his/her consent to such amendment. The amended version of these Rules will become effective towards the Data Subject, only upon the Data Subject's expressed consent.

Dated: **October 1<sup>st</sup>, 2017**

Talentify Co. Korlátolt Felelősségű Társaság

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