

INFORMATION ON DATA PROCESSING

KNOWLEDGE PYRAMID Korlátolt Felelősségű Társaság (seated at 1007 Budapest, Danubius Grand Hotel Margitsziget) (the "**Company**") is hereby giving you the following information concerning the processing of your personal data as is required under 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), and in particular in line with Article 13 and 14 of the GDPR.

1. The purpose and legal basis for data processing, the personal data processed, the duration of data processing, persons having access to data, data transfers

1.1 The processing of CVs

If you give your consent, the Company processes the following personal data of yours related to the job application:

the personal data included in your CV, and if we received your CV from our contractual party, your strengths and weaknesses and your wage demand as well, as personal data

In such case, the legal basis of the data processing is your consent pursuant to Article 6 (1) a) of the GDPR. Your consent provided according to this point can be withdrawn at any time free of charge via the e-mail address monika.slomska@knowledgepyramid.hu. The withdrawal of the consent does not concern the lawfulness of the data processing prior to the withdrawal.

We inform you that your application can be considered and transferred by us only if you give consent to the processing of your data included in your CV related to the job advertisement by the Company, and the transfer of such data. If we do not receive your CV directly from you, but from our contractual party as possible employer, we inform you about it.

The purpose of data processing is to ensure that the Company is able to review your CV, and contact you related to the consideration and transferring of your application in order to fill the empty positions at our contractual partner as potential employer.

The data processing takes place until the application process for the given position is closed. If your application is successful and you fill the vacant position, the Company processes the personal data for the above purposes for maximum one year following the performance. If your job application is not accepted, but you give further consent to process your personal data in respect of Section 1.3, Section 1.3 defines the duration of the data processing.

The data may be accessed exclusively by Monika Kinga Slomska and those companies to which the CVs are transferred, and by Ádám Jakabfi e.v. (1095 Budapest, Mester utca 83 A 9 01) as an IT background service provider.

1.2 Undertaking job interviews:

If you give your consent, the Company processes the following personal data of yours related to undertaking job interviews:

the personal data included in your CV, and if we received your CV from our contractual party, your strengths and weaknesses and your wage demand as well, as personal data

In such case, the legal basis of the data processing is your consent pursuant to Article 6 (1) a) of the GDPR. Your consent provided according to this point can be withdrawn at any time free of charge via the e-mail address, monika.slomska@knowledgepyramid.hu. The withdrawal of the consent does not concern the lawfulness of the data processing prior to the withdrawal.

We inform you that your application can be considered and transferred by us only if you give consent to the processing of your data included in your CV related to the job advertisement by the Company, and the transfer of such data. If we do not receive your CV directly from you, but from our contractual party as possible employer, we inform you about it.

The purpose of data processing is to ensure that the Company is able to undertake the job interview, and transfer the result of it to our contractual party as potential employer.

The data processing takes place until the application process for the given position is closed. If your application is successful and you fill the vacant post, the Company processes the personal data for the above purposes for maximum one year following the performance. If your job application is not accepted, but you give further consent to process your personal data in respect of Section 1.3, Section 1.3 defines the duration of the data processing.

The data may be accessed exclusively by Monika Kinga Slomska and those companies to which the CVs are transferred, and by Ádám Jakabfi e.v. (1095 Budapest, Mester utca 83 A 9 01) as an IT background service provider.

1.3 Transferring job opportunities to you

If you give your consent, the Company processes the following personal data of yours related to transferring job opportunities to you:

the personal data included in your CV, and your wage demand as well if you have indicated it

In such case, the legal basis of the data processing is your consent pursuant to Article 6 (1) a) of the GDPR. Your consent provided according to this point can be withdrawn at any time free of charge via the e-mail address, monika.slomska@knowledgepyramid.hu. The withdrawal of the consent does not concern the lawfulness of the data processing prior to the withdrawal.

The purpose of the data processing is to ensure that the Company is able to identify the job opportunities matching the search criteria you provided to us, and to keep contact with you in this respect.

The data processing takes place until you withdraw your consent.

The data may be accessed exclusively by Monika Kinga Slomska and those companies to which the CVs are transferred, and by Ádám Jakabfi e.v. (1095 Budapest, Mester utca 83 A 9 01) as an IT background service provider.

1.4 Maintaining registration regarding jobseekers

If you give your consent, the Company processes the following personal data of yours related to maintaining registration regarding jobseekers:

your name, the name of your employer, your interest in potential positions.

In such case, the legal basis of the data processing is your consent pursuant to Article 6 (1) a) of the GDPR. Your consent provided according to this point can be withdrawn at any time free of charge via the e-mail address, monika.slomska@knowledgepyramid.hu. The withdrawal of the consent does not concern the lawfulness of the data processing prior to the withdrawal.

The purpose of the data processing is to ensure that the Company is able to maintain an up-to-date register regarding the job opportunities, and due to this to be able to provide services of appropriate quality to its clients. It is also the purpose of the data processing to ensure that the Company is able to inform you about appropriate job opportunities.

Automated decision making will not take place.

The data processing takes place until you withdraw your consent.

The data may be accessed exclusively by Monika Kinga Slomska and those companies to which the CVs are transferred, and by Ádám Jakabfi e.v. (1095 Budapest, Mester utca 83 A 9 01) as an IT background service provider.

1.5 The processing of data of the contractual contact persons

If your employer concludes a contract with our company, the Company processes the following data in this respect:

Name, e-mail, phone number, company name, position

In such case, the ground for the data processing is the legitimate interest of the Company based on Article 6 (1) f) of the GDPR.

We process the data related to this point for 5 or 8 years pursuant to the relevant tax and accounting legislation.

We process the data of the contact person and the person acting on behalf of the other party participating in the performance of the contract until the change of the contact person, but until the performance of the contract at the latest. In the case of legal dispute, we process the data necessary for the legal dispute until the end of the legal dispute.

The data may be accessed exclusively by Monika Kinga Slomska and by Ádám Jakabfi e.v. (1095 Budapest, Mester utca 83 A 9 01) as an IT background service provider.

1.6 The performance of mandates

If you conclude a mandate agreement with the Company, the Company processes the following data related to the performance of such agreement:

your name, the personal data included in your CV, and your wage demand if any

The grounds for the data processing are Article 6 (1) b) of the GDPR (performance of a contract), Article 6 (1) c) of the GDPR (compliance with a legal obligation), considering that a contract has been concluded between you and the Company, and in connection with the performance of the contract the Company is subject to tax and accounting obligations.

Your data related to this point are processed by the Company for 5 years following the performance of the mandate, the data necessary for the performance of the Company's tax obligations are processed until the end of the tax law limitation period (for 5 years from the last day of the calendar year in which the tax should have been declared, notification should have been made or in lack of tax declaration, notification the tax should have been paid), that means maximum 7 years, and the data necessary for performing our accounting obligations are processed for 8 years.

The data may be accessed exclusively by Monika Kinga Slomska and those companies to which the CVs are transferred, and by Ádám Jakabfi e.v. (1095 Budapest, Mester utca 83 A 9 01) as an IT background service provider.

1.7 Data processed related to the coaching and mentoring of private individuals

If the Company provides coaching and mentoring services to you, the Company processes the following data of yours in this respect:

your name, the personal data included in your CV

In such cas, the grounds for the data processing are Article 6 (1) b) of the GDPR (performance of a contract), Article 6 (1) c) of the GDPR (compliance with a legal obligation), considering

that a contract has been concluded between you and the Company, and in connection with the performance of such contract the Company is subject to tax and accounting obligations.

Your data related to the present point are processed by the Company for 5 years following the performance of the mandate, the data necessary for the performance of the Company's tax obligations are processed until the end of the tax law limitation period (for 5 years from the last day of the calendar year in which the tax should have been declared, notification should have been made or in lack of tax declaration, notification the tax should have been paid), that means maximum 7 years, and the data necessary for performing our accounting obligations are processed for 8 years.

The data may be accessed exclusively by Monika Kinga Slomska and by Ádám Jakabfi e.v. (1095 Budapest, Mester utca 83 A 9 01) as an IT background service provider.

2. The data controller:

The Company acts as controller of your personal data as listed above.

3. Storing of data and description of technical and organizational measures applied in order to maintain data safety

Your personal data are stored at the Company's seat (1007 Budapest, Danubius Grand Hotel Margitsziget), and we store it on a cloud-based storage (Microsoft Office 365).

The Company applies all technical safety measures that can be reasonably expected to store the data in a safe way, not accessible to third parties.

An IT description of the safety measures, the technical and organizational measures taken to ensure the safety of data follows below: The Company's IT system is protected by continuously maintained firewall protection secured by firewall, virus scanner and spam filter, furthermore, by password.

We do not store the paper-based CVs.

4. Your rights in connection with data processing:

In connection with data processing related to employment, you have the following rights:

a) **right of access (Article 15 GDPR):** You are entitled to obtain from the Company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the information contained herein.

Per your request, the Company provides a copy of the personal data undergoing processing. For any further copies you request, the Company may charge a reasonable fee based on

administrative costs. Where you make the request by electronic means, and unless you request otherwise, the information will be provided in a commonly used electronic form.

b) right to rectification (Article 16 GDPR): You have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

c) right to erasure (Article 17 GDPR): You have the right to obtain from the Company the erasure of personal data concerning you without undue delay and the Company shall have the obligation to erase personal data 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;
- You object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject.

d) right to restriction of processing (Article 18 GDPR): You have the right to obtain from the Company restriction of processing where one of the following applies:

- You contest the accuracy of the personal data, for a period enabling the Company to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- the Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims or
- You have objected to processing.

e) right to object (Article 21 GDPR): You are entitled to object against the processing of your personal data at any time for reason related to your own position. In this case, the Company will delete the personal data immediately.

f) right to receive information on the above rights (Article 12 GDPR): the Company provides you with information on action taken on your request as per clauses a)-e) above without undue delay and in any event within one month of receipt of your request. The information is provided in a concise, transparent, intelligible and easily accessible form. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Company informs you of any such extension within one month of receipt of the request, together with the reasons for the delay.

The information is given free of charge. Where your request is manifestly unfounded or excessive, in particular because of its repetitive character, the Company may either i) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or ii) refuse to act on the request. The Company

bears the burden of demonstrating the manifestly unfounded or excessive character of the request.

g) **right to lodge a complaint (Article 77 GDPR):** You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the GDPR. The complaint can be filed with the National Data Protection and Freedom of Information Authority (NAIH) (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.; telephone: +36 1 391 1400; fax: +36 1 391 1410; www.naih.hu; ugyfelszolgalat@naih.hu).

h) **right to judicial remedy (Article 79 GDPR):** You have the right to judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company can be brought before the courts of the Member State where the Company has an establishment. Such proceedings may be brought before the courts of the Member State where you have your habitual residence.

i) **right to data portability (Article 20 GDPR):** You have the right to receive personal data which are processed for the purposes defined in the above Points 3.1-3.3, 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. Furthermore, you have the right to have the personal data transmitted directly from the Company to another data controller, where technically feasible.

j) **right to withdraw consent:** you may withdraw your consent provided in respect of the above Points 1.1 and 1.4 at any time, in which case we do not further process your personal data.

5. You may request information on the processing of your personal data via the channels and from the person below:

You may request further information in connection with the processing of your personal data from Ms. Monika Kinga Slomska, via mail 1007 Budapest, Danubius Grand Hotel Margitsziget) or email (monika.slomska@knowledgepyramid.hu). Per your request, verbal information may also be given in which case, minutes have to be taken. If you request verbal information (e.g. via phone), you are required to prove your identity towards the Company. If you wish to exercise your rights above, you have to contact Ms. Monika Kinga Slomska managing director (monika.slomska@knowledgepyramid.hu).

Dated: Budapest, August 29, 2018

KNOWLEDGE PYRAMID Korlátolt Felelősségű Társaság
represented by: Monika Kinga Slomska