

# PRIVACY POLICY OF UX STUDIO ZRT. FOR JOB APPLICANTS AND EMPLOYEES

25.03.2020

Present privacy policy (hereinafter as: „**Policy**”) in accordance with 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, and repealing Directive 95/46/EC (hereinafter as: “**GDPR**”) contains all information regarding the processing of personal data provided by the applicants (hereinafter as: „**Applicant**”) applying for open positions and the employees (hereinafter as: „**Employee**”) of

Company name: **UX studio Zártkörűen Működő Részvénytársaság**  
Registered seat: **1052 Budapest, Deák Ferenc tér 3. II. em., Hungary**  
Company registration number: **01-10-048628**  
Tax number: **25399479-2-41**  
Registered by: **Metropolitan Court of Budapest as Court of Registration**  
Represented by: **Dávid Pásztor director individually**  
E-mail: [hello@uxstudioteam.com](mailto:hello@uxstudioteam.com), [hr@uxstudioteam.com](mailto:hr@uxstudioteam.com)  
(hereinafter as: “**Employer**”)

## I. Definitions

### Personal data

means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person 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;

### 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, organization, 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 natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by EU or Member State law;

The Controller of your personal data is the Employer.

**Processor**

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

**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;

**Data forwarding**

Means the disclosure of personal data to specific third parties;

**Data subject**

Everybody who shares his/her personal data with the Service Provider through the Website or via other channels or whose personal data is processed by the Service Provider otherwise. For example, you who reads this Policy;

**Consent of the data subject**

means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

**Sensitive data**

personal data referring to racial origin, nationality, political opinions or membership in any political party, religious or other beliefs, membership of an advocacy organization, sex life, personal data concerning health, pathological data;

**Genetic data**

means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

**Biometric data**

means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy data;

**Personal data breach**

means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

## **II. In what cases do the Employer process personal data**

In accordance with the principles laid down by Article 5 Section (1) of the GDPR the personal data of the User is processed in the following cases:

- Applying for an open position
- Requesting notification when a position is being opened
- Concluding and executing an employment agreement
- Compliance of the Employer with its statutory reporting obligation
- Termination of the Employee's employment
- Access by the Employee to the Employer's premises
- Publishing the name and portrait of the Employee on the website

### III. Which personal data, for what purpose and how long does the Employer process

In the cases detailed above the legal ground for processing shall be the following:

- In accordance with article 6 Section (1) Point a) of the GDPR the freely given, specific, informed and unambiguous consent of the User (hereinafter as: **„Consent“**);
- In accordance with article 6 Section (1) Point b) of the GDPR processing is necessary for the performance of a contract to which the User is party (hereinafter as: **„Performance of Contract“**);
- In accordance with article 6 Section (1) Point c) of the GDPR processing is necessary for compliance with a legal obligation to which the controller is subject (hereinafter as: **„Compliance“**);
- In accordance with article 6 Section (1) Point f) of the GDPR processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (hereinafter as: **„Legitimate Interest“**);

#### III.1. Data processed regarding application for an open position

##### III.1. Data necessary to apply for a position

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Applicant	Contacting and identifying the Applicant	Consent	<p>Until the end of the application process as latest or if it is an earlier time then until withdrawing Consent.</p> <p>If after an unsuccessful application the Applicant expressively requests from the Employer in e-mail to keep their data until the end of a next application process for the given position, then until the end of the next application process or if the</p>

			Applicant withdraws their consent, then until the withdrawal.
E-mail address of the Applicant	Contacting and identifying the Applicant	Consent	<p>Until the end of the application process as latest or if it is an earlier time then until withdrawing Consent.</p> <p>If after an unsuccessful application the Applicant expressively requests from the Employer in e-mail to keep their data until the end of a next application process for the given position, then until the end of the next application process or if the Applicant withdraws their consent, then until the withdrawal.</p>
Phone number of the Applicant	Contacting and identifying the Applicant	Consent	<p>Until the end of the application process as latest or if it is an earlier time then until withdrawing Consent.</p> <p>If after an unsuccessful application the Applicant expressively requests from the Employer in e-mail to keep their data until the end of a next application process for the given position, then until the end of the next application process or if the Applicant withdraws their consent, then until the withdrawal.</p>

To apply for an open position published by the Employer, in the first round only providing the above personal data is necessary in order to identify the Applicant and in order to contact the Applicant if it becomes necessary.

If the Applicant applies for a published and open position, then they accept that submitting the application also means giving consent for processing the above data by the Employer.

During the course of the application process, the Employer uses the software named Recruitee, through which the Employer explores the Applicant's motivation and experience with guided questions. During this process the Employer does not request any personal data from the Applicant, the Applicant needs to answer some questions and in case they have a portfolio then it shall be submitted to the Employer.

If based on the answers given on the questionnaire the Applicant matches the criteria determined by the Employer, then the Employer will contact the Applicant at the telephone

number provided at the time of application for the purpose of assessing the Applicant's personality and language skills, during which the Employer will not require any personal information.

Thereafter, the Applicant must complete tasks related to the advertised position, which does not involve the processing of personal data either.

In the event of an unsuccessful application, the Applicant may request from the Employer, by e-mail, that the above information required for the application be processed until the next application process has been closed. If the Employer has such consent from the Applicant, it shall notify the Applicant of the opening of the new application in the event that the position is re-advertised.

### III.1.2. Data necessary to make an offer

Scope of data processed	Purpose of processing	Legal ground for processing	Naming the legitimate interest	Duration of processing
Data contained in the CV of the Applicant	Making an offer for the Applicant	Consent / Legitimate interest (during the term the possible claims are enforceable)	Enforcing claims based on labor law or equal treatment against the Applicant or the Employer	<p>In case of advertising the position until the end of the 3<sup>rd</sup> years open to labor law and equality claims after the application was evaluated in accordance with Article 286 Section (1) of Act I of 2012 on the Labor Code and Article 17 of Act CXXV of 2003 on equal treatment and the promotion of equal opportunities</p> <p>In case the position was not advertised until the last day of the 6<sup>th</sup> month from submitting the application</p>

In case the Employer is willing to make an offer for the Applicant. then before making the offer the Employer may request the CV of the Applicant.

The Employer has no impact on the content of the CV provided by the Applicant thus, the Employer is unable to provide complete information on the personal data processed, but in general, the following data may in particular be processed by the Employer:

- first and last name
- address

- place of birth
- date of birth
- the maiden name of the Applicant’s mother
- marital status of the Applicant
- education / qualification of the Applicant
- work experience of the Applicant
- social media accounts of the Applicant

The Employer processes the personal data contained in the CV of those Applicants for whom the Employer is willing to make an offer and until the deadline specified above.

If the Applicant sends their CV to the Employer in the absence of a proposal or open position, they acknowledge that by submitting the CV, they give their consent to the processing of the personal data contained in their CV. In this case, the Employer will process the Applicant's personal data until the next application period, but for a maximum of 6 months, for the purpose of making an offer.

### III.2. Requesting notification about newly opened position

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Applicant	Contacting and identifying the Applicant	Consent	Until withdrawing consent but a maximum of 1 year from submitting the request
E-mail address of the Applicant	Contacting and identifying the Applicant	Consent	Until withdrawing consent but a maximum of 1 year from submitting the request
The position the Applicant is willing to apply for	Contacting and identifying the Applicant	Consent	Until withdrawing consent but a maximum of 1 year from submitting the request

In the absence of an open position by providing the above personal data the Applicant has the possibility to request a notification from the Employer if a position the Applicant is willing to apply is open.

Sending the request is possible through the Employer’s website at <https://uxstudioteam.com/jobs/> by selecting the “Read more” option for a position and at the end of description by clicking on “Notify me when an opening is available” and filling and submitting the form on the site.

In this case the Employer processes the Applicant’s data under the consent of the Applicant, until the consent is withdrawn but until a maximum of 1 year from submitting the request.

### III.3. Concluding and executing an employment agreement and compliance of the Employer with its statutory reporting obligation

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	As a general rule the Employer processes personal data until the termination of employment.
Birthname (first and last name) of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	Data required to enforce labor law claims are processed by the Employer up to the end of the general 3-year limitation period, compensation for crime or personal injury claims for 5 years or if the limitation period for a crime is longer then until the end of the limitation period (Article 286 Section (1) and (2) of the Labor Code)  In the case of civil claims, the data necessary to enforce such claims are processed by the end of the 5-year limitation period (Article 6:22. of the Hungarian Civil Code)  Under Article 78 of Act CL of 2017 on taxation the tax related document containing the Employee's personal data – irrespective of the
Home address / residential address of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Birthplace of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Date of birth of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Maiden name of the Employee's mother	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Citizenship of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Tax number of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	

ID number / passport number of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	<p>method of registration – shall be processed until the end of the limitation period during which the tax shall be charged or in case of deferred tax until the fifth year in which the deferred tax is chargeable The Employer therefore retain the documents under which the tax or the tax that is payable in advance was determined until the end of the above term.</p> <p>Under Article 169 of Act C of 2000 on Accounting the Employer shall keep certain documents, such as the financial reports, the business reports, and the supporting inventory, valuations, general ledger statements, logbook or other records required by law in a readable form for 8 years.</p> <p>The Employer shall retain the documents and process the personal data contained therein that is needed to determine the length of service and pension calculations for 80 years from the date of termination of employment because certain social security entitlements are linked to a defined period of service and to the contributions made by</p>
ID number of the document (address card) verifying the Employee's address	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Social security number of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Driving license number of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Education / qualification of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Information about the ongoing studies of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Type and level of the foreign language knowledge of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Phone number of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
E-mail address of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	



Bank account number of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	the Employee in connection with their employment.
Membership in pension funds, health funds	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Trade union membership and name of trade union, amount of membership fee payable	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Number of dependent children	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Marital status	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Position	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Degree of work disability	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Legal working time, work schedule	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Information on skill and study	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	

Base salary of the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Allowances, reimbursements, and other payments due to the Employee	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Amounts to be paid or deducted from the base salary of the Employee pursuant to a final court decision (creditor's and debtor's data, title, amount, creditor's bank account number)	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Occupational health information	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Study contract details	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Training costs	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Performance evaluation data	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	
Disciplinary proceedings and sanctions imposed by the Employer	Establishing employment relationship, exercising of rights and obligations	Performance of contract / Compliance	

Certain personal data detailed above are necessarily and compulsorily processed by the Employer as they are necessary to establish employment relationship between the Employer and the Employee and to calculate and pay the salary of the Employee and to fulfill the legal obligation applicable to the Employer. Some of the above personal data will only be processed by the Employer if the underlying circumstances exist (e.g. court decision that orders deduction from the Employee’s salary in order to fulfill a payment obligation) and are therefore required to exercise rights and obligations. Unless the latter is the case, such data shall not be processed by the Employer.

The Employer informs the Employee that it will not process any additional data other than the above. The Employer does not process any medical records, but in some cases, it is necessary to become aware of such medical records, but in such case the Employer will only ascertain the content of such records but will not store them in any way except as set forth below.

The Employer draws the attention of the Employee to the fact that if the Employee provides the Employer with any additional personal data that was not mentioned above, it will immediately make it unrecognizable and irrevocably deletes them, and the Employer excludes any liability to the Employee for such claims that was made regarding such personal data that the Employee has brought to the notice of the Employer without request.

**III.4. Personal data processed in connection with the termination of employment**

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Employee	Exercising rights and obligations related to the termination of employment	Compliance	Data required to enforce labor law claims are processed by the Employer up to the end of the general 3-year limitation period, compensation for crime or personal injury claims for 5 years or if the limitation period for a crime is longer then until the end of the limitation period (Article 286 Section (1) and (2) of the Labor Code)
Home address / residential address of the Employee	Exercising rights and obligations related to the termination of employment	Compliance	
Maiden name of the Employee’s mother	Exercising rights and obligations related to the termination of employment	Compliance	
Birthplace of the Employee	Exercising rights and obligations related to the termination of employment	Compliance	
Date of birth of the Employee	Exercising rights and obligations related to the	Compliance	

	termination of employment		
Tax number of the Employee	Exercising rights and obligations related to the termination of employment	Compliance	
Base salary of the Employee	Exercising rights and obligations related to the termination of employment	Compliance	
Duration of employment (starting and termination date)	Exercising rights and obligations related to the termination of employment	Compliance	

### III.5. Access by the Employee to the Employer's premises

Scope of data processed	Purpose of processing	Legal ground for processing	Naming of the legitimate interest	Duration of processing
First and last name of the Employee	Preventing strangers from entering the premises of the Employer, controlling the Employee's work commute	Legitimate interest	Security and property protection, preventing the access of unauthorized persons	Until the termination of the employment

The Employer uses an access card system to access its premises and the office space for which processing the above personal data is necessary. The processing of the data above serves the purpose of safeguarding property by preventing unauthorized persons from gaining access to the Employer's premises or office space and to ensure the legitimate interest of the Employer. The access card does is not suitable to control the Employee's commuting.

The access card is issued by the management of the office building containing the offices of the Employer regarding which the Employer informs the Employee that the above data will be forwarded to the management of the office building.

### III.6. Publishing the name and the portrait of the Employee on the website

Scope of data processed	Purpose of processing	Legal ground for processing	Duration of processing
First and last name of the Employee	Making customer relations more personal, increasing trust	Consent	Until withdrawing consent or until the termination of the Employee's employment
Portrait of the Employee	Making customer relations more personal, increasing trust	Consent	Until withdrawing consent or until the termination of the Employee's employment
Position of the Employee	Making customer relations more personal, increasing trust	Consent	Until withdrawing consent or until the termination of the Employee's employment

The Employer, with the express and documented consent of the Employee, shall disclose the above personal data at <https://uxstudioteam.com/> to make customer relations more personal and increase the trust of business partners. If the Employee does not give their consent to the publication, the Employer will not publish the data, or if the Employee withdraws their consent that was previously given, then the Employer shall immediately terminate the publication.

#### IV. Source of personal data processed, methods of processing, forwarding of personal data

##### IV.1. Source of personal data processed

Personal data are provided to the Employer by the Employee concerned, and the provision of personal data by the Employee is a prerequisite for maintaining the employment relationship and, if requested, for the payment of the union membership fee; however, their acquisition is also a prerequisite for the fulfillment of the Employer's statutory social security, tax and administrative legal obligations, and so must be provided by the Employee. Refusal to provide personal data will result in termination of employment or failure to avail of the benefit or inability to apply for a union membership deduction. In the event of termination of employment, the source of the data may be an external source expressly mentioned in the termination notice.

The Employer informs the Employee that it records and checks the correctness of the Employee's personal data based on the ID documents, certificates, other documents presented by the Employee, which the Employer **does not copy**.

Exceptions to the above may include mandatory documentation requirements for EU and other state funded projects, or legal obligations related to the Employee's accounting and

certification obligations (e.g. copy of documentation is required in the event of a work-related accident or to participate in training applications). In each case, the Employer shall provide separate information on these personal data processing events.

## **IV.2. Methods of processing**

The Employer stores the personal data of the Employee it has become aware of, in paper form, either recorded in the employment agreement or on a separate record sheet, which the Employer shall keep at its headquarters separately and locked. In some cases, the Employer may process the data electronically, in a filing system, or otherwise. If the Employer processes the data electronically, it will do its utmost to ensure the security and integrity of the data, including, but not limited to actions like maintaining its servers in a secluded location, protecting computers with passwords. With respect to its company policy and to ensure transparency the Employer does not restrict access to personal data related to employment between Employees.

The Employer takes all necessary technical and organizational measures and precautions to protect the personal data of the Employee and its quality, by providing continuous physical and procedural protection with respect to the regulations on personal data processing.

Notwithstanding the above, the Service Provider shall not be liable for any damage, destruction or unauthorized access to the data in the event of technical error, natural disaster, terrorist or criminal act.

## **IV.3. Forwarding of personal data**

The Employer forwards or may forward the personal data of the Employee to third parties in the following cases:

**IV.3.1.** In order to fulfill taxation and social security obligations prescribed by law to the competent directorate of the National Tax and Customs Administration.

**IV.3.2.** For the enforcement of a potential legal claim to an authority, court or legal representative.

**IV.3.3.** For the following attorney / law firm drafting employment agreements for the Employer:

- Name: **attorney-at-laws Dr. Balázs Varga and Dr. Balázs Máté Varga**
- Address: **1052 Budapest, Deák Ferenc tér 3. II. emelet, Hungary**
- Bar identification: **36070967; 36072284**
- Tax number: **53114798-2-41, 55878760-1-41**
- E-mail: [dr.balazs.varga@icloud.com](mailto:dr.balazs.varga@icloud.com); [varga.balazs@dobosgerlai.hu](mailto:varga.balazs@dobosgerlai.hu)
- Phone: **+36 1 235 0405**

**IV.3.4.** For the following company providing accounting and payroll services for the Employer:

- Company name: **INTENTOR Könyvelőiroda Szolgáltató Korlátolt Felelősségű Társaság**
- Registered seat: **1142 Budapest, Ungvár utca 39., Hungary**
- Company registration number: **01-09-913183**
- Tax number: **14642010-2-42**
- Represented by: **Nóra Virág Kovács and Dénes Kulcsár managing directors individually**
- E-mail: [iroda@konyveled.hu](mailto:iroda@konyveled.hu)

**IV.3.5.** If the Employer designates the Employee as a contact person for the purpose of contacting contractual partners, then by the prior consent of the Employee to the contractual partner.

**IV.3.6.** Subject to the provisions of paragraph III.5. of this Policy, the Employer shall forward the personal data of the Employee to provide access to the offices to:

- Company name: **Mozsár Trade Center Ingatlankezelő Bt.**
- Registered seat: **1066 Budapest, Mozsár utca 16.**
- Company registration number: **01-06-729791**
- Tax number: **20602082-2-42**
- Represented by: **Dr. Walter Henss and Enikő Bokor managing directors individually**
- E-mail: [info@mozsartc.hu](mailto:info@mozsartc.hu)

**IV.3.7.** Data forwarding related to applying for an open position:

IV.3.7.1. To manage the application of the Applicants the Employer uses the Recruitee application tracking system, which is provided by an external service provider whose contact is:

- Company name: **Recruitee B.V.**
- Registered seat: **Keizersgracht 313, 1016 EE Amsterdam, The Netherlands**
- Registration number: **NL855439361B01**
- Represented by **Robbert Flipsen general director**
- E-mail: **Support@recruitee.com**
- Phone: **+31 85 888 0226**
- Web: <https://recruitee.com/>
- Other location within the European Union: **Recruitee Sp. z o.o. ul. plac Wiosny Ludow 2 - Kupiec Poznanski 61-831 Poznań**
- Main infrastructure is hosted at Google Cloud Platform and Amazon Web Services. (hereinafter as: “**Recruitee**”)

Recruitee is a private company with limited liability, registered and operating in the Netherlands. Recruitee processes data that is related to European citizens on servers hosted at Google Cloud Platform and Amazon Web Services.

Shall Recruitee forward data to servers located outside the territory of the European Union, namely in the United States of America the data of the Applicant is safe and is under the same protection as it is within the EU because Recruitee is an ISO 27001 certified

organization. The International Organization for Standardization (ISO) determines an international standard for information security management systems. (<https://recruitee.com/iso-27001>)

For the privacy policy of Recruitee visit: <https://recruitee.com/privacy-policy>

IV.3.7.2. The Employer processes the data received through Recruitee on the cloud servers of Google Drive which is provided by:

Company name: **Google Ireland Ltd**

Registered seat: **Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland**

Registration number: **368047**

Represented by: **Elizabeth Margaret Cunningham director**

Phone: **+353 1 436 1000**

Server location: **Dublin, Ireland**

(hereinafter as: “**Google**”)

Google processes EU related data within the territory of the European Union through its servers located in Dublin, Ireland. Google may not access, modify, delete, use or otherwise manipulate the Applicant related data stored on the server provided by Google.

Google provides the protection of data on multiple levels, such as physically protecting data storage servers, which are secured and supervised by security guards and technicians, it restricts access to server rooms by its employees and by providing uninterruptible power supply and other state-of-the-art infrastructure, restricting access to data, continuously monitoring its system, encryption and firewall protection. The Google Privacy Policy is available at <https://policies.google.com/privacy/frameworks>.

IV.3.8. Data forwarding related to requesting notification by the Applicant

The Employer manages the requests for notification received from the Applicants with Google Sheets provided by Google. For Google Sheets the provisions of IV.3.7.2. shall be applied.

IV.3.9. The Employee has access to the data of other Employees to ensure transparency and as the part of organizational culture.

## **V. Employees’ rights related to processing of their personal data**

Request for information (right to access): you may request information about the processing of your personal data at any time, either in person, at our registered seat address, in writing by sending a registered letter or by email to [hr@uxstudioteam.com](mailto:hr@uxstudioteam.com)

Pursuant to Article 15 Section (1) of the GDPR, a request may include information on the data processed, their source, purpose, legal ground, duration, name and address of any processor, processing activities and your rights in relation to processing. In the case of data transfer, to whom and for what purpose your data have been or will be transferred.



A request for information is considered authentic by us if you are clearly identified by it. If the request is sent by e-mail or post, only the e-mail sent from your registered e-mail address will be considered as authentic, and we will only be able to send information to the postal address registered by us. Unless you voluntarily verify your identity otherwise, we will not be able to send information to an e-mail address or postal address that is not registered in our records in order to protect your privacy.

**Rectification:** you may at any time request the rectification, modification or amendment of your data in the same manner described above. We can also do this only on the basis of a request from a credible source presented when submitting the request.

**Restriction:** you may request that we restrict the processing of our personal information in particular if:

- a) you argue the accuracy of the personal data we process. In this case, the limitation refers to the period during which the accuracy of the data is checked.
- b) Although the legal ground for processing does not stand for us, but you are requesting us in writing to keep them for the purpose of filing, asserting or defending any legal claim you may have

**Objection:** If we process your personal data on the ground of legitimate interest, you may at any time object to the processing of your personal data. In such cases, we will review the legality of the objection and, if it is well established, we terminate the processing of data and notify anyone to whom the personal data subject to the objection may have been previously transmitted.

**Deletion (“Right to be forgotten”):** you may request the deletion of your personal data at any time for any of the reasons set out in Article 17 Section (1) of the GDPR.

We may refuse deletion if the processing of your personal data is required by law or if it is necessary to enforce our legal claims. We will always inform you about the refusal of the request for deletion. Once it is deleted, the data cannot be recovered.

**Transfer of Personal Data (Portability):** you may at any time request us to transfer the data processed in connection with you in a structured, widely used, machine-readable format to you or to another controller.

We kindly ask you to not exercise the above rights improperly, but only if it has a real ground or if any of the conditions set out in the GDPR actually exist.

## **VI. To whom and in what cases are we required to disclose personal data?**

We may be requested to disclose personal data we process to authorities upon request. Our company cannot be held liable for any such transfer or any resulting consequences. We will always inform you about the transfer.

## **VII. Management of Personal data breach**

Any personal data breach that may occur will be reported to the supervisory authority within 72 hours from becoming known to us in accordance with the law, and we will also maintain records of any breach that may occur. In the cases specified by law, we also inform the Employees concerned.

## **VIII. Data Protection Officer (DPO)**

Pursuant to Article 37 of the GDPR appointment of a DPO is mandatory if:

- a) the processing is carried out by a public authority or body, except for courts acting in their judicial capacity;
- b) the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale; or
- c) the core activities of the controller or the processor consist of processing on a large scale of special categories of data pursuant to Article 9 and personal data relating to criminal convictions and offences referred to in Article 10.

With respect to that the Service Provider is not subject to any of the clauses above and because there is no other compelling reason to appoint a DPO we are not appointing anyone for this position.

## **IX. Whom can the Employee turn to for information in connection to their personal data or to exercise their rights?**

With their questions related to personal data processing and the rights related thereto the Employee shall primarily contact the Employer or the person exercising the employment rights.

The Employee is entitled to exercise their rights related to the processing of personal data against the Employer as controller. If the Employee wishes to exercise their rights, they must notify the Employer first.

If the Employee feels that their rights have been violated, they may make a complaint at the National Authority for Privacy and Freedom of Information:

Name: **National Authority for Privacy and Freedom of Information**

Address: **1125 Budapest, Szilágyi Erzsébet fasor 22 / C., Hungary**

Mailing address: **1530 Budapest, PO box: 5., Hungary**

Phone: **+36 1 391 1400**

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

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