

## Information about data management for job applicants

The protection of the personal data of prospective employees is extremely important to us. We have developed this Data Protection Notice to provide information about what personal data we process about you, for what purpose and on what legal basis, as well as what organizational and technical measures we take to protect your personal data, and to inform you about your rights.

### 1. Data controller details

**Data controller:** Wozify Engineering Group Kft.

**Registered office:** 1043 Budapest, Berda József utca 42. 2nd floor, door 11

**Company registration number:** 01-09-414698

**Tax number:** 23879102-2-41

**Website:** [www.wozify.com](http://www.wozify.com)

**Data protection officer contact:** [hello@wozify.com](mailto:hello@wozify.com)

### 2. General legal provisions governing data processing

- 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)
- Act CXII of 2011 on the right to informational self-determination and freedom of information (Infotv.)
- Act I of 2012 on the Labour Code (Mt.)

### 3. Definitions

**Personal data:** 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, 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. Such typical personal data include in particular: name, address, place and date of birth, mother's name.

**Data processing:** any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Data Controller:** the natural or legal person, public authority, agency or any 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 the processing are determined by Union or Member State law, the Controller or the specific criteria for the designation of the Data Controller may also be determined by Union or Member State law.

**Data Processor:** a natural or legal person, public authority, agency or any other body that processes personal data on behalf of the Data Controller.

**Recipient:** the natural or legal person, public authority, agency or any other body to which the personal data are disclosed, whether a third party or not.

#### 4. Data processing activity

The Data Controller processes the personal data of job applicants as follows:

##### 4.1. Applying for the advertised job vacancy

Purpose of data processing	Checking the conditions required to fill the vacancy by applying for the advertised job
Legal basis for data processing	Article 6(1)(a) GDPR: consent
Scope of personal data processed	To apply for a job: <ul style="list-style-type: none"> <li>personal data proving that you meet the educational and qualification requirements set out in your CV and related documents</li> </ul>
Data retention period	Until the withdrawal of the consent, but not later than <b>the closing of the job application and the notification of its outcome</b>

##### 4.2. Participation in the database

Purpose of data processing	Verification of the existence of the necessary conditions for the job in the database of the Data Controller for a possible future job offer
Legal basis for data processing	Article 6(1)(a) GDPR: consent
Scope of personal data processed	To apply for a job: <ul style="list-style-type: none"> <li>personal data proving that you meet the qualifications, competences requirements set out in your CV and related documents</li> </ul>
Data retention period	<b>Until withdrawal of consent</b>

#### 4.3. Participation in an interview

Purpose of data processing	Conduct an interview with the job applicant
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract
Scope of personal data processed	To apply for a job: <ul style="list-style-type: none"><li>• personal data proving that you meet the educational and qualification requirements set out in your CV and related documents</li><li>• notes taken and information obtained during the interview</li></ul>
Data retention period	<b>1 year</b> from the end of the interview

#### 4.4. Making a payment offer

Purpose of data processing	Making a salary offer to the most suitable candidate
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract
Scope of personal data processed	To apply for a job: <ul style="list-style-type: none"><li>• Name</li><li>• telephone number</li><li>• your email address</li><li>• information about the offer (position, payment offer, starting date, conditions of acceptance)</li></ul>
Data retention period	<b>6 months</b> from the date of the payment offer. If the offer of payment is accepted, the retention period set out in the Employee Privacy Notice will apply.

#### 4.5. Contact

Purpose of data processing	Contacting the job applicant
Legal basis for data processing	Article 6(1)(b) GDPR: necessary for the performance of the contract or for taking steps at the request of the Data Subject prior to the conclusion of the contract
Scope of personal data processed	To apply for a job: <ul style="list-style-type: none"> <li>• Name</li> <li>• telephone number</li> <li>• your email address</li> </ul>
Data retention period	Until the CV is kept. If the offer is accepted, the retention period set out in the Employee Privacy Policy will apply.

## 5. Recording data

The personal data are transferred from the Data Subject to the Data Controller **via a job search portal or directly**.

## 6. Addressees

### 5.1. Standalone Data Controller(s)

Additional contracted partners are involved in the recruitment process in their capacity as independent data controllers, from whose database the personal data of the job applicant are transferred to the database of the Data Controller. Such independent Data Controller(s):

- job search portal operator(s):
  - Profession.hu is operated by Profession.hu Kft. (registered office: 1123 Budapest, Nagyerő utca 8-14., company registration number: 01-09-199015)  
The privacy notice is available at this link: <https://www.profession.hu/adatkezeles/#jelentkezes-allashirdetesre>
- professional community portal:
  - LinkedIn provider is LinkedIn Ireland Unlimited Company (based in Wilton Plaza, Wilton Place, Dublin 2, Ireland)  
The privacy notice is available at this link: [https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy)

If other Data Controller(s) are involved in the job application process, the Data Controller will always inform the Data Subject individually.

### 5.2. Data processor(s)

The Data Controller shall only use a Data Processor(s) that provides adequate guarantees, in particular in terms of expertise, reliability and resources, to implement technical and organisational measures to ensure compliance with the requirements of the GDPR, including security of processing.

The specific tasks and responsibilities of the Data Processor are set out in the Data Processing Contract concluded between the Data Controller and the Data Processor. The Processor shall not take any independent decisions and shall act only on the basis of the Processing Contract and in accordance with the instructions of the Data Controller.

**The Data Processor(s):**

- **recruitment and headhunting company(ies):**

- Human Recruitment Management Kft. (registered office: 1172 Budapest, Ignác utca 38, door 1, company registration number: 01-09-416319)
- ProcessHunt Ltd. (registered office: 2030 030 Érd, Vereckei utca 61., company registration number: 13-09-223281)  
The privacy policy is available at this link:  
<https://processhunt.hu/adatkezelesi-tajekoztato/>

- **mail system:**

- Microsoft Hungary Ltd. (registered office: 1031 Budapest, Graphisoft Park 3., company registration number: 01-09-262313)  
The privacy policy is available at this link:  
<https://www.microsoft.com/hu-hu/privacy/privacystatement>
- Tárhely.Eu Szolgáltató Kft. (registered office: 1097 Budapest, Könyves Kálmán körút 12-14., company registration number: 01-09-909968)  
Google Ireland Ltd. (registered office: Gordon House, Barrow Street, Dublin 4, Ireland)  
The privacy notice is available at this link:  
<https://policies.google.com/technologies/product-privacy?hl=hu>  
The privacy notice is available at this link:  
[https://tarhely.eu/dokumentumok/adatvedelmi\\_szabalyzat.pdf](https://tarhely.eu/dokumentumok/adatvedelmi_szabalyzat.pdf)

- **hosting provider:**

- UpCloud Oy. (registered office: Aleksanterinkatu 15b 7th floor, 00100 Helsinki, Finland)  
The privacy policy is available at this link:  
<https://upcloud.com/privacy-policy>

- **cloud-based software:**

- Notion Labs Inc. (2300 Harrison St, San Francisco, CA 94110, United States)  
The Privacy Policy is available at this link:  
<https://www.notion.so/notion/Terms-and-Privacy-28ffdd083dc3473e9c2da6ec011b58ac>

- **file sharing platform:**

- Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland  
The privacy notice is available at this link:  
<https://policies.google.com/technologies/product-privacy?hl=hu>
- Dropbox International Unlimited Company (based at Hatch Street Upper, One Park Place, Floor 6, Dublin 2, Ireland)  
The privacy notice is available at this link:  
<https://www.dropbox.com/terms>
- Formagrid Inc. (799 Market St., 8th Floor, San Francisco, CA 94103, United States )  
The Privacy Policy is available at this link:  
<https://www.airtable.com/company/privacy>
- **online communication platform:**
  - Zoom Lionheart Squared Ltd., 2 Pembroke House, 28-32 Upper Pembroke Street, Dublin DO2 EK84, Ireland)  
The privacy notice is available at this link:  
<https://www.zoom.com/en/trust/privacy/privacy-statement/?ampDeviceId=c203b9e8-b1be-4c46-bac5-c3748b114dfb&ampSessionId=1741555929284>

If the involvement of other Data Processor(s) becomes necessary during the job application process, the Data Controller will always inform the Data Subject individually.

## **7. Data transmission**

The Data Controller may transfer personal data to another recipient, the Data Controller will always inform the Data Subject individually. Transfers of data shall only take place on the basis of the provisions of applicable law and on the basis of documented requirements (e.g. on the basis of a request from a public authority or a court).

## **8. Access to data**

Personal data may be accessed by the competent staff of the Data Controller to the extent necessary for the performance of their tasks.

## **9. Data security measures**

The Data Controller shall take appropriate IT, technical and personnel measures to protect the personal data it processes against, inter alia, unauthorised access or unauthorised alteration.

## **10. Data Subjects' rights in relation to data processing and their content**

Data subject rights related to data processing	Content of the Data Subject's right in relation to data processing
Right to information /Articles 13-14 of the GDPR/	You have the right to be informed of the fact and purposes of the processing at the time of obtaining your personal data. The Controller will also provide you with such additional information as is necessary to ensure fair and transparent processing, taking into account the specific circumstances and context in which the personal data are processed. You shall also be informed of the fact of profiling and its consequences.
Right of access /Article 15 of the GDPR/	You have the right to request information as to whether your personal data is being processed and, if such processing is taking place, you have the right to be informed that the Data Controller: <ul style="list-style-type: none"> <li>• what personal data</li> <li>• on what legal basis</li> <li>• for what purpose</li> <li>• how long it treats</li> <li>• to whom, when, under which law, to which personal data, to whom you have given access or to whom you have transferred your personal data</li> <li>• the source of your personal data (if not provided by you to the Data Controller)</li> <li>• whether it uses automated decision-making and its logic, including profiling.</li> </ul>
Right to rectification /Article 16 of the GDPR/	You have the right to have inaccurate personal data concerning you corrected or incomplete personal data completed by the Data Controller at your request. You may therefore request that the Controller amend any of your personal data (for example, you may change your e-mail address or other contact details at any time).
Right to erasure ("right to be forgotten") /Article 17 of the GDPR/	You have the right to have your personal data deleted by the Data Controller at your request if one of the following grounds applies: <ul style="list-style-type: none"> <li>• your personal data are no longer necessary for the purposes for which they were collected or otherwise processed</li> </ul>

	<ul style="list-style-type: none"> <li>• you withdraw your consent on the basis of which the processing was based pursuant to Article 6(1)(a) or Article 9(2)(a) and there is no other legal basis for the processing</li> <li>• you object to processing on the basis of Article 21(1) and there is no overriding legitimate ground for processing, or you object to processing on the basis of Article 21(2)</li> <li>• your personal data have been unlawfully processed</li> <li>• your personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Data Controller is subject</li> <li>• your personal data have been collected in connection with the provision of information society services referred to in Article 8(1).</li> </ul>
Right to restriction /Article 18 of the GDPR/	<p>You have the right to have the Controller restrict the processing of your personal data at your request if one of the following grounds applies:</p> <ul style="list-style-type: none"> <li>• You contest the accuracy of your personal data (in which case the limitation applies for the period of time that allows the Controller to verify the accuracy of the personal data)</li> <li>• the processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use</li> <li>• the Controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of a legal claim</li> </ul> <p>You have objected to the processing pursuant to Article 21(1) (in which case the restriction applies for the period until it is established whether the legitimate grounds of the Controller prevail over your legitimate grounds).</p>
Right to data portability /Article 20 of the GDPR/	<p>You have the right to receive personal data concerning you which you have provided to a Data Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another Data Controller without hindrance from the Data Controller to which you have provided the personal data, if:</p> <ul style="list-style-type: none"> <li>• the processing is based on consent within the meaning of Article 6(1)(a) or Article 9(2)(a), or on a contract within the meaning of Article 6(1)(b), and</li> <li>• the processing is carried out by automated means.</li> </ul>



	You have the right to request, where technically feasible, the direct transfer of your personal data between Data Controllers.
Right to object /Article 21 of the GDPR/	<p>You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on Article 6(1)(e) or (f), including profiling based on those provisions. In such a case, the Controller may no longer process your personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.</p> <p>If your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such purposes, including profiling, where it is related to direct marketing.</p>
Right to withdraw consent /Article 7(3) GDPR/	<p>You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal. You must be informed of this before consent is given. The withdrawal of consent shall be made possible in the same simple manner as the granting of consent.</p>

#### 11. Data Subject's legal remedies related to data processing and their content

Legal remedies	Content of the legal remedy
Right to complain to the Supervisory Authority /Article 77 of the GDPR/	<p>If your right to the protection of your personal data is infringed, you may lodge a complaint with the following Authority:</p> <p>National Authority for Data Protection and Freedom of Information  head office: 1055 Budapest, Falk Miksa utca 9-11.  mailing address: 1363 Budapest, Pf. 9.  phone: +36 (1) 391-1400  email: <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>  Website: <a href="http://www.naih.hu">www.naih.hu</a></p>
The right to an effective judicial remedy against	You have the right to take legal action against the Data Controller or Data Processor if you consider that the

the Controller or the Processor (initiation of legal proceedings) /Article 79 of the GDPR/	processing of your personal data is unlawful. The court will decide the case out of turn. In such a case, you are free to decide whether to bring your action before the competent court in your place of residence or domicile. The courts can be contacted at: <a href="http://www.birosag.hu/torvenyszekek">www.birosag.hu/torvenyszekek</a>
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## 12. Update of the Privacy Notice

The Data Controller reserves the right to unilaterally amend this Privacy Notice. In particular, this Privacy Notice may be amended if necessary due to changes in legislation, data protection authority practices, business needs or other circumstances. At the Data Subject's request, the Data Controller shall send him a copy of the current version of the Privacy Notice in the form agreed with him.

**Budapest, 15 May 2025.**