

**PANNONIA BIO ZRT.**  
**PRIVACY NOTICE**

**ON THE PROCESSING OF PERSONAL  
DATA OF POTENTIAL EMPLOYEES**

**5 November 2021.**

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## 1. INTRODUCTION

**Pannonia Bio Zrt** (registered seat: 1051 Budapest, Zrínyi utca 16. I. floor. 1.; company registration number: 01- 10-046437; hereinafter referred to as the "**Data Controller**") carries out recruitment activities, in the course of which it processes personal data of potential employees ("**Data Subjects**").

The purpose of this Privacy Notice (hereinafter referred to as the "**Notice**") is to inform Data Subjects about the most important circumstances of the processing of personal data.

## 2. GENERAL PROVISIONS

The Data Controller acts as a data controller in relation to the personal data specified below and acknowledges the contents of this Notice as binding. The Data Controller undertakes to ensure that all processing in relation to recruitment complies with the requirements set out in this Notice and applicable law.

The Data Controller is committed to protecting the personal data of Data Subjects and attaches the utmost importance to respecting the right to informational self-determination of Data Subjects. The Company handles personal data confidentially and takes all security, technical and organisational measures to ensure the security of the data.

The Data Controller processes the personal data of the Data Subjects exclusively in Hungary and does not transfer it to persons other than the data processors specified in this Notice.

Persons providing personal data to the Company should note that if they do not provide their own personal data, the data provider is obliged to obtain the consent of the data subject.

The data protection rules and information on the Data Controller's data processing are continuously available at <https://pannoniabio.com>. The Data Controller reserves the right to change the Notice, which will be communicated in accordance with the legislation in force.

If you have any questions regarding this Notice, please contact us at [info@pannoniabio.com](mailto:info@pannoniabio.com) and one of our colleagues will answer you.

The Data Controller's data processing principles comply with the applicable data protection legislation, in particular:

- *The Fundamental Law of Hungary (Freedom and Responsibility, Article VI);*
- *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 (General Data Protection Regulation) - ("**GDPR**")*
- *Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information ("**Infotv.**");*
- *Act V of 2013 on the Civil Code - ("**Civil Code**");*
- *Act I of 2012 on the Labour Code ("**Labour Code**").*

### 3. DETAILS OF THE DATA PROCESSING

*Purpose of the data processing:* to find and recruit suitable staff.

*Compliance with the principle of purpose limitation:* the Data Controller shall only carry out those processing activities on the personal data processed which are necessary for the fulfilment of the purpose of the processing. The Controller shall define the scope of the persons who have access to the personal data as narrowly as possible (see below). The necessity of the storage of personal data shall be regularly reviewed by the Controller. The Controller shall destroy (irretrievably delete) any data which are no longer necessary for the purposes set out above.

*Legal basis for processing:* consent of the Data Subjects.

*Scope of the data processed:*

- During the selection procedure, the Data Controller processes the following set of data sent to the Data Controller for the purpose of applying for the advertised job (mandatory):
  - full name,
  - e-mail address,
  - phone number,
  - professional curriculum vitae,
  - other personal data sent for the purpose of applying for a job.
- If, on the basis of the data sent for the purpose of applying for a job, the Data Controller wishes to further investigate the possibility of recruiting the data subject, depending on the position covered by the job application, the Data Controller may also process the following data with the data subject's consent:
  - data, results, and answers obtained in personality tests and/or vocational tests

*Source of the processed data:* the Data Controller obtains the personal data as defined above in the following ways:

- by public online recruitment databases or by the transfer of data by recruiters or recruitment companies,
- by transfer by third parties (employees),
- by the Data Subject providing the data (e.g. by submitting an application via a website).

*Duration of processing:* the Data Controller will process personal data for as long as the above purpose is fulfilled. In any case, the processing shall not be longer than:

- 6 months;
- 2 years, if the Data Subject has given his or her consent in a separate legal declaration.

The processing shall also cease if the Data Subject so requests.

*Location of processing:* the Data Controller stores personal data on its own servers located at its registered seat.

*Access related to the personal data processed:* personal data are processed by the HR department of the Data Controller. In the selection procedure, the right to access the personal data of the Data Subjects is granted to the managerial staff members who have the right to

decide on the vacancy advertised. The Company will not transfer the Data Subjects' personal data to third parties unless it is legally obliged or authorised to do so. The data processor specified in the section '*Details and contact details of data processors*' is entitled to access the data relating to the personality and vocational tests.

*Requests from public authorities:* We inform the Data Subjects that the court, the prosecutor, the investigating authority, the law enforcement authority, the administrative authority, the National Authority for Data Protection and Freedom of Information ("**NAIH**") or other bodies authorised by law may request the Data Controller to provide information, data, or documents, and the Data Controller will disclose the requested data to the requesting authority as prescribed by law. The Data Controller shall disclose to the public authorities, provided that the public authority has indicated the precise purpose and scope of the data, personal data only to the extent strictly necessary for the purpose of the request.

#### **4. MEANS OF STORING PERSONAL DATA AND SECURITY OF PROCESSING**

The location of processing is primarily the registered seat of the Data Controller.

The Data Controller shall select and operate the IT tools used for the processing of personal data in the recruitment process in such a way that the processed data:

- a) is accessible to authorized persons (**accessibility**);
- b) can be confirmed as regards its authenticity and verification (**authenticity of processing**);
- c) can be verified to be unchanged (**data integrity**);
- d) is protected against unauthorized access (**data confidentiality**).

The Data Controller shall take appropriate measures to protect the data against, in particular, the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data

#### **5. ADDITIONAL DATA CONTROLLERS**

In the recruitment process, the operators of online recruitment databases cooperating with the Data Controller, as well as other third parties facilitating recruitment, act as independent data controllers in the recruitment process.

#### **6. DETAILS AND CONTACT DETAILS OF DATA PROCESSORS**

The Company employs the following data processor for the purpose of conducting the personality tests and the vocational tests:

**SHL Hungary Vezetéslélektani , Managerképző és Alkalmasságvizsgáló Kft.**

Registered seat: 2040 Budaörs, Kossuth L. u. 20.

Company registration number: 13-09-118103

Phone: + 36 23 / 703 002

E-mail: support@shl.hu

The Company uses the following data processor to store personal data for applications submitted on the website:

**WebDream Magyarország Kft.**

Registered seat: 1037 Budapest, Testvérhegyi lejtő 10.

Company registration number: 01-09-908813

E-mail: [info@webdream.hu](mailto:info@webdream.hu)

## **7. RIGHTS AND REMEDIES**

If you have any questions, comments or complaints about the Company's processing of your data, please contact the Company using the contact details provided in section 6.

The data subject may request information about the processing of his or her personal data, and may request the rectification, erasure or restriction of his or her personal data, except for mandatory processing, by the means indicated when the data were collected or by contacting the Company at the contact details indicated in this Notice.

At the request of the data subject, the Company shall provide information about the data processed by the Company or by a processor on its behalf, the source of the data, the purpose, legal basis and duration of the processing, the name and address of the processor and the activities related to the processing, and, in the case of data transfers, the legal basis and the recipient of the data. The Company shall provide the information in an intelligible form, in writing at the data subject's request, within the shortest possible time from the date of the request, but not later than 25 days (unless a shorter time limit is provided for by other law). This information shall be provided free of charge if the person requesting it has not already submitted a request for information to the Company in the current year for the same set of data. In other cases, the Company shall charge a fee.

The Company will correct the personal data if it is inaccurate and if the correct personal data is available to it.

The Company shall restrict personal data if the data subject so requests or if, on the basis of the information available to it, it is likely that restriction would harm the data subject's legitimate interests. The restricted personal data may be processed only for as long as the processing purpose which precluded the restriction of the personal data persists.

The Company shall mark the personal data it processes if the data subject contests the accuracy or correctness of the personal data, but the incorrectness or inaccuracy of the contested personal data cannot be clearly established.

The Company shall restrict personal data if the processing is unlawful, the data subject requests the restriction, the processed data is incomplete or inaccurate - and this situation cannot be lawfully remedied - provided that the restriction is not precluded by law, the purpose of the processing has ceased, or the statutory period for storing the data has expired, or the court or the National Authority for Data Protection and Freedom of Information has ordered it.

The Company has 25 days to erase, restrict or rectify the personal data. If the Company does

not comply with the data subject's request for rectification, restriction or erasure, it shall provide the reasons for the refusal in writing within 25 days. The Company shall notify the data subject and any person to whom the data was previously disclosed to of the rectification, restriction, flagging and erasure. The Data Controller will not notify the Data Subject if doing so does not undermine the legitimate interests of the data subject with regard to the purposes of the processing.

The data subject may object to the processing of his or her personal data if:

- a) the processing or transfer of personal data is only necessary for the fulfilment of a legal obligation to which the Company is subject or for the purposes of the legitimate interests pursued by the Company, the data subject or a third party unless the processing is required by law;
- b) the personal data is used or disclosed for direct marketing, public opinion polling or scientific research purposes;
- c) in other cases specified by law.

The Company shall examine the objection within the shortest possible time from the date of the request, but not later than 15 days, and shall decide whether the objection is justified and inform the applicant in writing of its decision. If the Company finds that the data subject's objection is justified, it shall cease processing, including further collection and transfer of data, and restrict the data, and shall notify the objection and the action taken on the basis of the objection to all those to whom it has previously disclosed the personal data concerned by the objection and who are obliged to take measures to enforce the right to objection. If the data subject disagrees with the decision taken by the Company, he or she may challenge it in court within 30 days of the date of notification.

The Data Subject may take legal action against the Company in the event of a breach of his/her rights. The court will decide the case out of turn. The Company shall compensate any damage caused to another party by unlawful processing of the data of the Data Subject or by breach of data security requirements. The Company shall be exempt from liability if the damage was caused by an unavoidable cause outside the scope of the processing. The Company shall not be liable to compensate the damage if the damage was caused intentionally or by gross negligence on the part of the injured party.

You can also lodge a complaint with the data protection authority:

**National Authority for Data Protection and Freedom of Information**

Registered seat: Budapest, Falk Miksa u. 9-11, 1055  
Hungary.

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

Phone: +36 1 391 1400

Fax: +36 1 391 1410

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