

**PRIVACY NOTICE
FOR APPLICANTS RESPONDING TO JOB
ADVERTISEMENTS OR REGISTERING IN THE
DATABASE
REGARDING THE PROCESSING OF THEIR
PROVIDED PERSONAL DATA**

PannonDiák Iskolaszövetkezet

1. General Information

Pannondiák Iskolaszövetkezet (registered office: 8000 Székesfehérvár, Berényi út 72–100) (hereinafter referred to as: Pannondiák Iskolaszövetkezet or Data Controller), in its capacity as Data Controller, acknowledges the binding nature of this Privacy Notice and undertakes to ensure that its data processing activities comply with the provisions set out herein and with the applicable laws in force.

Through this Privacy Notice, Pannondiák Iskolaszövetkezet guarantees that personal data are treated confidentially and that it implements all necessary security, organizational, and technical measures to safeguard the security of personal data.

The data processing principles applied by Pannondiák Iskolaszövetkezet are set out in this Privacy Notice and are in compliance with the applicable data protection legislation, in particular:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR);
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information;
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services;
- Act V of 2013 on the Civil Code;
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

This Privacy Notice is continuously available on the website of Pannondiák Iskolaszövetkezet at www.pannondiak.hu.

Pannondiák Iskolaszövetkezet reserves the right to amend this Privacy Notice at any time. In the event of any amendments, data subjects shall be duly informed in due time.

Should you have any questions regarding this Privacy Notice, please contact us at info@pannondiak.hu

2. Definitions Used in This Notice

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

Data Controller: 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 designation may be provided for by Union or Member State law.

Consent of the Data Subject: 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.

Data Processor: A natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller.

Third Party: A natural or legal person, public authority, agency or other body other than the data subject, the Data Controller, the Data Processor and persons who, under the direct authority of the Data Controller or Data Processor, are authorised to process personal data.

Personal Data Breach: A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Genetic Data: Personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or health of that natural person and which result, in particular, from the analysis of a biological sample from the natural person concerned.

Biometric Data: Personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data.

Data Concerning Health (Health Data): Personal data related to the physical or mental health of a natural person, including the provision of healthcare services, which reveal information about his or her health status.

3. Purpose, Legal Basis, Duration and Scope of Processing of Personal Data

3.1. Processing of Personal Data of Applicants Responding to Job Advertisements or Registering in the Database

Purpose of Processing: The purpose of processing is to search for and recommend employment and job opportunities to the data subjects and to provide work opportunities. This purpose includes, in particular:

- identification of the Data Subjects;
- maintaining contact with the Data Subject;
- assessing the Data Subject's qualifications, skills and preferences;
- identifying and recommending suitable job opportunities to the Data Subjects, taking into account their qualifications, skills and preferences;
- establishing contact between the Data Subject and a potential employer and facilitating the creation and maintenance of an employment relationship;
- conducting selection procedures related to job advertisements published by the Data Controller;
- if the Data Subject is not selected for the applied position, further processing of the Data Subject's personal data, subject to their consent, in order to offer additional job opportunities.

Legal Basis for Processing: The processing of personal data is based on the voluntary consent of the Data Subject. If, for any reason, consent is not applicable, the legal basis for processing shall be Article 6(1)(b) of the GDPR (performance of a contract or steps prior to entering into a contract).

Scope of Data Processed: the following categories of personal data may be processed: Personal identification data (surname, first name, birth name, title, place and date of birth, mother's name, citizenship); Contact details (telephone number, permanent address, residence address, email address); Type of driving licence; Professional field and/or geographical area of job search; Information relating to qualifications and professional experience; Previous and most recent workplaces; Fields of interest; Salary expectations; References and certificates provided by the applicant; Student ID number and validity; Copy of student ID card; IP address in the case of application by email; Password in the case of online registration; IT skills; Any other data provided by the Data Subject in connection with the intended contractual relationship.

Duration of Processing: In the case of applications submitted for a specific job advertisement, personal data shall be processed for the duration of the purpose of processing (i.e. until the position is filled).

Thereafter, data shall be processed: for the period specified in the Data Subject's consent; or in the absence of such specification, based on legitimate interest, for a maximum period of 3 years from the commencement of processing.

Disclosure of Data (Data Transfer): By applying for a job advertisement or registering in the database (either online or in paper form), the Data Subject consents to the disclosure (transfer) of their personal data by PannonDiák Iskolaszövetkezet, or acknowledges that their data may be transferred to partner companies (employers) using the services of PannonDiák Iskolaszövetkezet for the purposes of recruitment and/or selection. As the list of partner companies is continuously changing, it would involve disproportionate effort to name all partners in this general notice. Prior to any data transfer, the Data Subject shall be informed of the specific partner concerned. Where the legal basis of the transfer is the Data Subject's consent, such consent may be given, refused, or withdrawn at any time.

The Data Controller declares that, following the disclosure of personal data to partners, it assumes no responsibility for the lawfulness of the partner's processing of such data. The Data Subject may obtain further information about the recipient partners and about the partner's data processing practices on the partner's website or through other contact details provided by the partner.

If, during the selection process, the Data Subject makes use of accommodation and/or travel services provided by the Data Controller, personal data shall be transferred to the service provider for the purposes of identification and verification of eligibility (name, date of birth, residential address).

Categories of Data Subjects: All natural persons who register on the website www.pannondiak.hu or in person at the customer service office, job fairs, or other events.

Method of Processing: Electronically and/or in paper-based form, manually.

3.2 Registration, Creation of User Account

Purpose of Processing: the purpose of processing is to enable the Data Subject to manage, modify and delete the data and CVs stored in their user account. Furthermore, the data may be used for the purpose of applying for job advertisements, setting up job searches, saving job offers, maintaining contact with the Data Subject, sending notifications, and informing the Data Subject about job offers and work opportunities matching their qualifications, skills and preferences.

Legal Basis for Processing: the processing of personal data is based on the voluntary consent of the Data Subject. If, for any reason, consent is not applicable, the legal basis for processing shall be Article 6(1)(b) of the GDPR (performance of a contract or steps prior to entering into a contract).

Scope of Data Processed: Full name, email address, password.

Duration of Processing: the Data Controller processes personal data for the duration of the purpose of processing, and until the Data Subject requests the deletion of their data or withdraws their consent to the processing of their personal data.

Data Disclosure: personal data may be disclosed to third parties.

Categories of Data Subjects: all natural persons who register on the website.

Method of Processing: electronically and manually.

3.3. Use of Tests in the Selection Process

Purpose of Processing: the purpose of processing is the application of tests during the selection process as part of identifying and recommending job opportunities to the Data Subjects.

Legal Basis for Processing: The processing of personal data is based on the voluntary consent of the Data Subject. If, for any reason, consent is not applicable, the legal basis for processing shall be Article 6(1)(b) of the GDPR (steps prior to entering into a contract).

Scope of Data Processed: personal identification data (surname, first name, date of birth, email address). Following the completion of the tests — including job suitability tests, personality tests, logical reasoning tests, skills and competency assessment tests, and knowledge level assessment tests — and the signing of the consent declaration, the results of such tests.

Duration of Processing: personal data shall be processed for a period of 3 years from the commencement of processing.

Data Transfer: after becoming aware of the test results, the Data Subject may declare, in a written statement, that they accept the transfer of their personal data and test results by PannonDiák Iskolaszövetkezet to partner companies using its services for the purpose of recruitment.

Categories of Data Subjects: All natural persons participating in the tests.

Method of Processing: electronically and/or in paper-based form, manually.

3.4. Electronic Correspondence Related to the Service

If, in the course of using the services of PannonDiák Iskolaszövetkezet, you have any questions or concerns, you may contact us via the contact details provided under the “Contact” section of the website www.pannondiak.hu or by email at info@pannondiak.hu. PannonDiák Iskolaszövetkezet shall delete incoming emails — together with the sender’s name, email address, and any other personal data voluntarily provided — no later than six months following the resolution of the matter concerned. Emails received for registration purposes shall be deleted — together with the sender’s name, email address, and any other personal data voluntarily provided — no later than six months from the processing of the email (i.e. recording in the database).

4. Data Processors

For the performance of certain technical (IT-related) operations concerning personal data, we engage data processors. Our data processors are as follows:

- Pannonjob Kft. (8000 Székesfehérvár, Berényi út 72–100) – server services
- Videoton Holding Zrt. (8000 Székesfehérvár, Berényi út 72–100) – email services

- HRSzoftver Kft. (2045 Törökbálint, Kossuth L. u. 40) – recruitment software maintenance
- 4-TEAM Szolgáltató Kft. (1085 Budapest, Horánszky u. 23) – server services

5. Storage and Security of Personal Data

PannonDiák Iskolaszövetkezet, as Data Controller, undertakes to ensure the security of personal data and to implement the technical and organizational measures, as well as establish the procedural rules, necessary to guarantee that the data collected, stored, and processed are protected. Furthermore, it shall take all necessary measures to prevent the destruction, unauthorized use, and unauthorized alteration of such data.

PannonDiák Iskolaszövetkezet, as Data Controller, ensures that unauthorized persons cannot access, disclose, transmit, modify, or delete the processed data. The processed data may be accessed exclusively by the Data Controller, its employees, and the Data Processors engaged by it. The Data Controller shall not transfer such data to any third party who is not authorized to access the data.

The Data Controller shall take all reasonable measures to ensure that the data are not accidentally damaged or destroyed. The Data Controller shall impose the above obligation on all employees participating in data processing activities.

The User/Data Subject acknowledges and accepts that, when providing personal data on the website, despite the fact that the Data Controller applies up-to-date security tools to prevent unauthorized access to or disclosure of data, the protection of data on the Internet cannot be fully guaranteed. In the event of unauthorized access or data acquisition despite our efforts, the Data Controller shall not be liable for such unauthorized data acquisition or access, nor for any damage incurred by the User/Data Subject as a result thereof.

Furthermore, the User/Data Subject may also provide their personal data to third parties, who may use such data for unlawful purposes or in an unlawful manner.

6. Rights of Data Subjects and the Exercise of Their Rights

Data Subjects have specific rights in relation to their personal data, and Data Controllers are obliged to enable the exercise of these rights. In cases where we act as Data Controller (i.e. where we determine the purposes and means of processing personal data), Data Subjects may exercise their rights relating to their personal data as set out below.

6.1 Right of Access to Personal Data

As a Data Subject, you have the right to access the personal data processed by us as Data Controller. If you wish to exercise this right, please send an email to info@pannondiak.hu

6.2 Rectification (Correction) of Personal Data

In order to update personal data processed by us as Data Controller, or to complete incomplete data, please send an email to info@pannondiak.hu.

Where personal data are retained, we do not assume responsibility for continuously verifying the accuracy of such data. Where feasible, upon being informed that any personal data processed by us are no longer accurate, we will carry out the necessary rectification based on the updated information provided by you (where possible).

6.3 Withdrawal of Consent

The processing of personal data is generally not based on consent (as the Data Controller typically relies on another legal basis). However, where processing is based on the Data Subject's consent, you have the right to withdraw your consent at any time. To withdraw your consent to the processing of your personal data, please send an email to info@pannondiak.hu. If you no longer wish to receive emails from us, you may also click the unsubscribe link included in our emails.

6.4 Right to Restriction of Processing and Right to Object

For reasons relating to your particular situation, you may at any time request the restriction of the processing of your personal data or object to the processing of your personal data, unless such processing is required by law.

In such cases, we will cease processing or restrict the processing of your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or which relate to the establishment, exercise, or defense of legal claims.

6.5 Other Rights of Data Subjects

In addition to the rights of access, rectification, restriction, and objection described above, Data Subjects may have further rights in relation to personal data held by us, including the right to erasure and the right to data portability. If you wish to exercise any of these rights, please send an email to info@pannondiak.hu.

6.6 Complaints and Legal Remedies

If you have any complaints regarding our use of your personal data, please send your complaint, including the details thereof, by email to info@pannondiak.hu. All complaints received will be investigated and responded to. You also have the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information or to seek judicial remedy if you believe that your rights have been violated. For further information regarding your rights and the procedure for submitting a complaint, please visit: <http://naih.hu/panaszuegyintezes-rendje.html>.

If you have any comments or questions regarding the data processing activities of PannonDiák Iskolaszövetkezet, please contact us at info@pannondiak.hu

Contact Details of the Data Controller:

Name: PannonDiák Iskolaszövetkezet

Registered seat: 8000 Székesfehérvár, Berényi út 72–100, Hungary

Company registration number: 07-02-001384

Registering court: Székesfehérvár Regional Court – Court of Registration

Tax number: 24124962-1-07

Phone: +36 22 554 170

Email: info@pannondiak.hu

Data Protection Officer of the Data Controller:

Name: Dr. Krisztián Bölcskei

Phone: +36 31 781 20 12

Email: info@adatvedelmiaktor.hu

This Privacy Notice was adopted on 24 May 2018.