

Data Protection Notice in connection with Recruitment and Hiring Process

This Data Protection Notice is intended to provide information, in accordance with the provisions of the General Data Protection Regulation (hereinafter "GDPR"), on how **2Connect Kft., 4iG Nyrt., 4iG Informatikai Zrt., and One Magyarország Zrt. (hereinafter: "Company", "our Company" or "we")** process your personal data during the recruitment and hiring process.

This Data Protection Notice can help you to understand how we process your personal data, what rights you may exercise, and what legal remedies are available to you.

Please note that the four Companies are considered as separate data controllers for the purposes of this Data Protection Notice. In this Data Protection Notice, we have separated the various data processing activities according to which are performed by one Company and which are performed by all Companies.

1. Data controller and contact details

This table provides information about each Company as a data controller.

Name	2Connect Kft.
Registered office	H-1013 Budapest, Krisztina Krt. 39.
Postal address	H-1013 Budapest, Krisztina Krt. 39.
Email	hrgeneralistak@4ig.hu

Name	4iG Nyrt.
Registered	H-1013 Budapest, Krisztina Krt. 39.
Postal	H-1013 Budapest, Krisztina Krt. 39.
Email	hr@4ig.hu

Name	4iG Informatikai Zrt.
Registered	H-1039 Budapest, Montevideo utca 2/c.
Postal	H-1039 Budapest, Montevideo utca 2/c.
Email	hr@4ig.hu

Name	One Magyarország Zrt.
Registered	H-1112 Budapest, Boldizsár utca 2.
Postal	H-1112 Budapest, Boldizsár utca 2.
Email	hrgeneralistak@4ig.hu

2. Data protection officer and contact details regarding each company

2.1 Contact details of the data protection officer of 2Connect Kft.

Postal	H1013 Budapest, Krisztina Krt. 39.
Email	dpo@2connect.hu

2.2 Contact details of the data protection officer of 4iG Nyrt.

Postal	H-1013 Budapest, Krisztina Krt. 39.
Email	dpo@4ig.hu

2.3 Contact details of the data protection officer of 4iG Informatikai Zrt.

Postal	H-1013 Budapest, Krisztina Krt. 39.
Email	dpo-itsi@4ig.hu

2.4 Contact details of the data protection officer of One Magyarország Zrt.

Postal	H-1112 Budapest, Boldizsár utca 2.
Email	dpo@one.hu

3. For what purpose(s) do we process personal data and on what legal basis?

Data processing carried out exclusively by 4iG Nyrt.

Below you will find information about data processing carried out exclusively by 4iG Nyrt.

3.1 Provision of a recruitment system	Data processing is carried out in order to provide the registration interface necessary for applying for jobs advertised in the recruitment system and to enable the submission of applications through the system.
	Personal data is processed on the basis of the "legitimate interest" pursuant to Article 6(1)(f) of the GDPR.
	Personal data will be processed for 1 year after registration.

We have a legitimate interest in developing a recruitment system within which job vacancies can be advertised, applications can be submitted and applications can be tracked in an organised manner, according to a uniform system, efficiently and in a simple way.

In connection with the above data processing, 4iG Nyrt. has carried out the necessary balancing of interests in order to establish the existence of a legitimate interest. If you require further information in connection with the outcome of the balancing of interests, please contact us at the **contact details provided in section 2.1.**

Data processing carried out by all Companies

Below you will find information about the data processing carried out by all Companies described in section 1.

3.2 Conducting the recruitment process	Data processing is carried out in order to conduct the recruitment process for the job vacancies we advertise, in which we offer a job to the most suitable candidate for the position at the end of the recruitment process.
	Personal data is processed on the basis of the "contractual legal basis" pursuant to Article 6(1)(b) of the GDPR, as data processing is necessary to take steps at the request of the data subject prior to entering into a contract.
	Personal data will be processed until the advertised position is finally filled, but for no longer than 1 year from the date of the job advertisement.

In connection with the data processing specified in point 3.2, we would like to inform you that we need the data in order to carry out the recruitment process initiated by you, at the end of which we will make you an offer to conclude an employment contract (if we select you as a result of the recruitment process). Please note that if you do not provide us with this data, we will not be able to carry out the recruitment process and therefore will not be able to make you an offer even if you are the selected candidate.

3.3 Conducting background checks	Within the framework of the recruitment process, we process your personal data in order to: - determine whether your employment poses a corruption risk to us, - determine whether, if you are hired, you can be expected to comply with the standard compliance requirements applicable to us (in particular the ISO 27001 and MSZ ISO 37001 standards) in the course of your work, - investigate whether there may be any economic or legal conflicts of interest that could harm or jeopardise our legitimate interests if you are employed. The results of the check will determine whether your future employment could pose a risk from our perspective. During the background check, we process data relevant to the job from public sources based on the CV you have provided and submitted to us. The following sources are used for the background check: - Company information: Data contained in the official company information database, information on senior executives and ownership. - Data contained in your publicly available profile on social media sites (Facebook, LinkedIn, etc.). - Results obtained from searches on popular internet search engines. - Other online information that is publicly available to anyone. Personal data is processed on the basis of the "legitimate interest" pursuant to Article 6(1)(f) of the GDPR. The data necessary for conducting the background check will be processed until the check is completed, and the personal data related to the above decision will be processed until the recruitment process is completed, i.e. until an offer is made or a rejection is communicated.
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Our legitimate interest is to be able to meet the anti-corruption and information security screening requirements of ISO standards, thereby ensuring that only persons whose employment does not pose a risk to our operations are recruited.

In relation to the above data processing, our Company has carried out the necessary balancing of interests to establish the existence of a legitimate interest. If you require further information in connection with the outcome of the balancing of interests, please contact us at the contact details provided in section 2.

3.4 Sending job advertisement notifications	We process your personal data in order to send you notifications about job vacancies advertised by us to your registered email address, if you so request. Please note that we will only send you notifications about job vacancies at the Company for which you have given your consent.
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	The processing of personal data is based on "consent" pursuant to Article 6(1)(a) of the GDPR.
	Personal data will be processed until consent is withdrawn, but for no longer than two years from the date of consent.

The provision of personal data is voluntary and failure to do so will not result in any consequences for you.

3.5. Employee referral programme	We process your personal data so that if an employee of the Company provides your name, email address, or possibly your CV, we will ask you via a system notification to submit your application for our advertised position.
	The processing of personal data is based on our "legitimate interest" pursuant to Article 6(1)(f) of the GDPR.
	Personal data will be processed until the advertised position is filled, but for no longer than one year from the date of the job advertisement.

Our legitimate interest is to use the referral programme to find the most suitable candidate for a vacant position as quickly as possible with the help of our employees' expertise. Employees are familiar with the job, the tasks to be performed, the employer's organisation, the working conditions, and the candidate they recommend, so they are more likely to recommend someone with whom we can establish an employment relationship.

In relation to the above data processing, our Company has carried out the necessary balancing of interests in order to establish the existence of a legitimate interest. If you require further information in connection with the outcome of the balancing of interests, please contact us at the contact details provided in point 2.

4. Who has access to your personal data? Who are the recipients of personal data?

Your personal data is accessed by our employees on a *need-to-know* basis, which means that your personal data is only accessed by our employees to the extent strictly necessary for the performance of their duties.

4.1. What data processors do we use?

Data processors used by all Companies

Below we describe the data processors used by all Companies

In order to achieve the above mentioned purposes, the following table describes the service providers that our Company uses as data processors. These service providers carry out certain data processing activities on behalf of and for the benefit of our Company.

Data processor	Data processor's registered office	Activities performed by the data processor on our behalf
SAP Hungary Kft.	H-1031 Budapest, Záhony u. 7, Graphisoft Park	Cloud-based service for SAP Successfactors recruitment application
Microsoft Ireland Operations Limited	D18 P521, Ireland, Dublin 18, Leopardstown, South County Business Park	Provision of O365 e-mail system and Microsoft Teams platform
BCS Consulting Services Kft.	H-1118 Budapest, Rétköz u. 5.	Troubleshooting and operational support related to SAP

		Successfactors recruitment software
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Other data processors used by 2Connect Kft., 4iG Informatikai Zrt., and One Magyarország Zrt.

Please note that if your recruitment process is conducted by 2Connect Kft., 4iG Informatikai Zrt., or One Magyarország Zrt., we also use 4iG Nyrt. as a data processor for the purpose of conducting the recruitment process and performing background checks.

Data processor	Data processor's registered office	Activities performed by the data processor on our behalf
4iG Nyrt.	H-1013 Budapest, Krisztina Krt. 39.	Conducting recruitment procedures (as per section 3.2), performing background checks (as per section 3.3), participating in employee referral programmes (as per section 3.5)

4.2. To which third parties, bodies and organisations may we transfer your personal data?

In addition to the above, our company will only make your personal data available to third parties if this is necessary for the fulfilment of a legal obligation or if an authority orders us to provide the data.

If we process your data for the purpose of enforcing, protecting or pursuing legal claims, we may transfer your personal data to the authority or court handling the case.

5. Do we transfer your data to third countries (outside the European Economic Area)?

Your personal data may be transferred to the United States or any other country where Microsoft Corporation, its subsidiaries or additional data processors operate by Microsoft Ireland Ltd., the provider of the Office 365 e-mail system and Microsoft Teams platform, as a data processor. The transfer of data will be carried out by Microsoft Ireland Ltd. in accordance with Chapter V of the GDPR.

Microsoft Corporation is included in the list under the Data Privacy Framework between the European Union and the United States, which ensures an adequate level of protection of personal data in accordance with the European Commission's Implementing Regulation of 10 July 2023. Data transfers to countries other than the United States are carried out on the basis of standard data protection clauses pursuant to Article 46 of the GDPR.

6. Automated decision-making, including profiling

With regard to your personal data, of the above data processing purposes, the one specified in point 3.2, Conducting the recruitment process, involves pre-screening candidates, the lawfulness of which is ensured by Article 22(2)(a) of the GDPR. During the pre-screening process, candidates must answer questions (yes/no) that are important for the position in question. Based on the answers to these questions, the system either allows the candidate to proceed to the recruitment staff or rejects their application. This provides our recruiters with an automated pre-screening process.

If the candidate gives an inappropriate answer to the question to be decided, the system automatically rejects the candidate's application for the position and sends a notification to the applicant.

No automated decision-making or profiling takes place in relation to the other data processing purposes.

7. Your data protection rights

Please note that you can exercise your rights under the GDPR at any time by submitting a request to us via one of the contact details provided, either verbally, in writing or electronically.

Your data protection rights are summarised below.

- 7.1. Right of access:** you have the right to obtain confirmation from the controller as whether or not your personal data are being processed. Where we process your personal data, you have the right to know what information we hold about you and the circumstances in which we hold it.

You also have the right to request a copy of your personal data. In this case, a copy of the personal data may be provided to you in a commonly used machine-readable format (PDF/XML) or in a hard copy in paper format. Requesting a copy is free of charge, but we may charge a reasonable fee if you request additional copies.
- 7.2. Withdrawal of consent:** You have the right to withdraw your consent at any time without giving any reason. However, the withdrawal does not affect the lawfulness of data processing carried out before the withdrawal of consent. At the same time, after the withdrawal of consent, we will no longer perform any operations using the personal data concerned, and we will delete/anonymise them.
- 7.3. Right to rectification:** You have the right to request from the controller without undue delay the rectification of your inaccurate personal data, taking into account the purpose of the processing. As long as the correction or completion of the data cannot be carried out in the absence of additional information, we will restrict the processing of your personal data and temporarily suspend the processing operations, except for storage.
- 7.4. Right to erasure:** You have the right to request the erasure of personal data relating to you if we no longer need it or if you have concerns about the lawfulness of the processing of your personal data. If we are under an obligation to delete the personal data we are processing, we will cease to process the data and delete/anonymise it.
- 7.5. Right to restriction of processing:** You have the right to request the restriction of the processing of your personal data in certain cases, if you have concerns about the lawfulness of the processing or if we no longer need the data but you require it for the assertion, enforcement or defense of legal claims. During the period of restriction, we will not process your personal data, with the exception of storage.

If personal data is subject to such restrictions, we may only process the data with your consent, for the purpose of asserting, enforcing or defending legal claims, or to protect the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State.
- 7.6. Right to data portability:** You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format and to transmit this data to another controller if we process your personal data on the basis of your consent or for the performance of a contract and the processing is carried out by automated means. In this case, we will provide the personal data in a structured, commonly used and machine-readable format. Exercising this right does not automatically result in the deletion of your personal data from our systems.
- 7.7. Rights relating to automated decision-making:** You have the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects concerning you or similarly significantly affects you.

You do not have this right if the automated decision-making is necessary for entering into or performing a contract with you; is authorised by EU or Hungarian law applicable to us, which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or you have given your explicit consent to it.

7.8 Right to object: You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data for the following purposes:

**Provision of a recruitment system,
Conducting background checks,
Employee referral programme.**

In this case, we will no longer process your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims. If the right to object is exercised, we will no longer process your personal data for the purposes of the objection. In this case, we will delete/anonymize your personal data.

8. Submitting a complaint to the supervisory authority

If we have processed your personal data in a way that is incompatible with the applicable legislation or if we have not complied with your request to exercise your rights or have not complied with them properly, you have the right to lodge a complaint with the data protection supervisory authority using the following contact details:

Name	Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
Registered seat	H-1055 Budapest, Falk Miksa street 9-11.
Postal address	H-1363 Budapest, Pf.: 9.
E-mail	ugyfelszolgalat@naih.hu
Telefon	+36 (30) 683-5969, +36 (30) 549-6838, +36 (1) 391-1400
Telefax	+36 (1) 391-1410