

**PRIVACY NOTICE OF NETRISK MAGYARORSZÁG KFT.FOR JOB
APPLICATIONS**

effective from: 1 November 2025

Table of contents

I.	INTRODUCTION	2
a.	Name of the Data Controller	2
b.	Concepts relating to the processing of personal data	2
c.	The relevant legislation	3
II.	DATA PROCESSING IN CONNECTION WITH THE ESTABLISHMENT OF AN EMPLOYMENT RELATIONSHIP	3
a.	Data processing in relation to job applications	3
b.	Contact on social media	3
c.	Data processing relating to the job interview	4
d.	Data processing related to the offers	4
e.	Registration of applicants	5
III.	DATA SECURITY	5
a.	organisational measures	5
b.	Technical measures	5
IV.	YOUR RIGHTS	6
a.	Withdrawal of consent	6
b.	Access	6
c.	Rectification	6
d.	Erasure	7
e.	Restrictions on processing	7
f.	Data portability	7

g.	Protest	7
h.	Our procedure regarding your request to exercise your rights	8
V.	YOUR LEGAL REMEDY OPTIONS	8
a.	complaint submission to the National Authority for Data Protection and Freedom of Information	8
b.	Judicial remedy	8

I. INTRODUCTION

This Privacy Notice (Privacy Notice) provides information on the processing of personal data of candidates for job vacancies advertised by Netrisk Hungary Kft. (Data Controller).

The Privacy Notice has been prepared taking into account the GDPR, the Infotv. and other legislation relevant to the employment relationship.

It is available in printed form at the Data Controller's registered office and in electronic form at the following URL: <https://www.netrisk.hu/karrier>.

The Data Controller reserves the right to unilaterally change this Privacy Notice at any time. If the Privacy Notice is amended, the Data Controller will inform job applicants accordingly.

a. Name of the Data Controller

The Privacy Notice contains the name and contact details of the Data Controller.

Name of Data Controller: Netrisk Magyarország Kft.

Registered office: H-1138 Budapest, Szekszárdi utca 16-18.

Company reg. no: 01-09-307894

VAT number¹: 26208600-4-41

Group VAT number: 17784485-5-41

EU Group VAT: HU 17784485

E-mail: hr@netriskmagyarorszag.hu

Data Protection Officer's name: Zsuzsanna Mátraházi

Postal address: H-1138 Budapest, Szekszárdi utca 16-18.

E-mail: matrahazi.zsuzsanna@netriskmagyarorszag.hu

b. Concepts relating to the processing of personal data

- data controller: the legal person who determines the purposes and means of the processing of personal 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, transfer, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

¹ Before 1 November 2025: 26208600-2-41

- erasure: rendering data unrecognisable in such a way that their recovery is no longer possible;
- data processor: a legal person who processes personal data on behalf of the controller;
- recipient: a natural or legal person, public authority, agency or any other body to whom or with which personal data are disclosed, whether or not a third party;
- data subject: a natural person who is identified or identifiable; 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;
- consent of the data subject: a freely given, specific, informed and unambiguous indication of the data subject's wishes by which they signifies, by a statement or by an act unambiguously expressing their consent, that they signifies their agreement to the processing of personal data relating to them;
- personal data: any data relating to the data subject;
- objection: a statement by the data subject objecting to the processing of their personal data and requesting the cessation of the processing or the erasure of the processed data.

c. The relevant legislation

In drafting this Privacy Notice, the Data Controller has taken into account the applicable laws in force and the main international recommendations, in particular:

- Regulation (EU) No 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 of Informational Self-determination and Freedom of Information;
- Act I of 2012 on the Labour Code;
- Act V of 2013 on the Civil Code (Civil Code);
- Act CXXX. of 2016 on the Code of Civil Procedure (CCP).

II. DATA PROCESSING IN CONNECTION WITH THE ESTABLISHMENT OF AN EMPLOYMENT RELATIONSHIP

a. Data processing in relation to job applications

Potential future employees can apply for positions and jobs advertised by the Data Controller through job portals, headhunting companies and recruitment agencies, as well as directly to the Data Controller by e-mail. The Data Controller will endeavour to process only the personal data necessary for the processing of the job application. ATTENTION! The Data Controller reminds job candidates to provide only the most necessary information (CV) when applying for a job. In connection with job applications, the Data Controller processes your personal data as follows:

- Personal data processed: natural person identification data (name, surname, first name, title, mother's name, date and place of birth, address), contact details (e-mail address, telephone number), biographical data (education, work experience, previous jobs), reference data (data relating to previous jobs), other personal data included in the CV (e.g. photograph).
- Purpose of processing: contacting, processing and assessing the job application.
- Legal basis for processing: legitimate interest of the Data Controller in the selection of suitable employees (Article 6(1)(f) GDPR).
- Recipient of the processing: The Data Controller has primary access to personal data processed in connection with job applications. In the case of job applications where the applicant applies to the owner of the Data Controller or to another subsidiary of the Data Controller through the Data Controller, the data will be transferred to that subsidiary. In the case of job advertisements on websites, the personal data provided will also be accessible by the job advertising sites. If proceedings are opened before a court or other authority which require the transmission of personal data to the court or authority, the court or authority may also have access to the personal data.
- Duration of processing: after the closing date of job applications.

You may exercise your rights of access, rectification, erasure, restriction of processing and objection in relation to personal data processed in connection with job applications. The conditions of exercising the data subject rights are included in Chapter IV of the Privacy Notice.

b. Contact on social media 3

Finding the right employee for the right job is a priority for the Data Controller. To ensure that, the Data Controller contacts the 'candidate' considered suitable by the Data Controller's human resources (HR) officer for a particular position on the professional social networking site (LinkedIn) using the social networking site's messaging function, inquiring whether the 'candidate' would be interested in the position. In this context, the Data Controller processes your personal data as follows:

- The scope of personal data processed: first and last name, professionally relevant data available on LinkedIn profile, content of the messages exchanged during the contact.
- Purpose of processing: contacting.
- Legal basis for processing: the legitimate interest of the Data Controller in the selection of a suitable candidate (Article 6(1)(f) GDPR).
- Recipient of the processing: Personal data processed for the purpose of contacting you may be accessed primarily by the Data Controller and LinkedIn Ireland Unlimited Company (www.linkedin.com) as the operator of the LinkedIn social media platform. The Controller does not transfer the personal data processed to persons established in Hungary, Europe or third countries. If proceedings are opened before a court or other authority which require the transmission of personal data to the court or authority, the court or authority may also have access to the personal data.
- Duration of processing: when the obligation to erase is triggered (objection or exercise of the right to erasure), up to the time of contact.

With regard to the personal data processed for the purpose of contacting you, you may exercise your rights to object, access, rectify, erase or restrict the processing. The conditions of exercising the data subject rights are included in Chapter IV of the Privacy Notice.

c. Data processing relating to the job interview

During the selection process of the suitable candidate, after pre-screening the CVs, the Data Controller invites the most suitable candidates to a personal, oral interview, professional interview. In connection with the interview, the Controller will process your personal data as follows:

- Personal data processed: name and surname, title, contact details (e-mail address, telephone number), answers to the professional questions asked during the interview and the conclusions drawn from them for the candidate.
- Purpose of data processing: to select suitable candidates on the basis of a personal interview.
- Legal basis for processing: legitimate interest of the Data Controller in the selection of suitable employees (Article 6(1)(f) GDPR).
- Recipient of processing: The Data Controller has primary access to the personal data processed in connection with the job interview. In the case of job interviews where the applicant applies for a job with the owner of the Data Controller or another subsidiary of the Data Controller, the data will be transferred to that subsidiary. If proceedings are opened before a court or other authority which require the transmission of personal data to the court or authority, the court or authority may also have access to the personal data.

- Duration of processing: after the closing date of job applications.

You may exercise your rights of access, rectification, erasure, restriction of processing and objection in relation to the personal data processed in connection with the job interview. The conditions of exercising the data subject rights are included in Chapter IV of the Privacy Notice.

d. Data processing related to the offers

At the end of the selection process, the Data Controller sends an offer to the selected candidate(s) by e-mail regarding the content of the employment contract between the parties. In connection with the offer, the Data Controller will process your personal data as follows:

- Personal data processed: name and surname, title, contact details (e-mail address), content of the offer (proposal of the essential terms of the employment contract).
- Purpose of processing: to agree on the content of certain aspects of the employment contract.
- Legal basis for processing: processing is necessary for taking the steps necessary to establish the employment relationship (contractual legal basis, Article 6(1)(b) GDPR).
- Recipient of processing: The Data Controller has primary access to the personal data processed in connection with the offer. In the case of applications where the applicant applies to the owner of the Data Controller or to another subsidiary of the Data Controller through the Data Controller, the data will be transferred to that subsidiary. If proceedings are opened before a court or other authority which require the transmission of personal data to the court or authority, the court or authority may also have access to the personal data.
- Duration of processing: date of conclusion of the employment contract.

You may exercise your rights of access, rectification, erasure, restriction of processing and objection in relation to the personal data processed in connection with the offer. The conditions of exercising the data subject rights are included in Chapter IV of the Privacy Notice.

e. Registration of applicants

Finding the right people for the right job is a priority for the Data Controller. To ensure that, it allows data subjects to request that their personal data be kept on file until a possible future job application is assessed. In this context, the Controller processes your personal data as follows

- Personal data processed: natural person identification data (name and surname, mother's name, date and place of birth, address), contact data (e-mail address, telephone number), biographical data (education, professional experience, previous jobs), reference data (data relating to previous jobs), other personal data contained in the CV.

- Purpose of processing: to record personal data for the purpose of assessing a possible future job application.
- Legal basis for processing: consent of the data subject (Article 6(1)(a) GDPR).
- Recipient of processing: The Data Controller has primary access to the personal data processed for record-keeping purposes. The Controller does not transfer the personal data processed to persons established in Hungary, Europe or third countries. If proceedings are opened before a court or other authority which require the transmission of personal data to the court or authority, the court or authority may also have access to the personal data.
- Duration of data processing: upon the obligation to erase (withdrawal of consent or exercise of the right to erasure), but not longer than 1 year.

You may exercise your rights to withdraw consent, access, rectification, erasure, restriction of processing and portability in relation to personal data processed for record-keeping purposes. The conditions of exercising the data subject rights are included in Chapter IV of the Privacy Notice.

III. DATA SECURITY

The Data Controller and the data processors are entitled to access your personal data to the extent necessary for the performance of their tasks. The Data Controller shall take all security, technical and organisational measures to ensure the security of the data.

a. Organisational measures

The Data Controller shall allow access to its IT systems by means of personalised access rights. The principle of “necessary and sufficient rights” applies to the allocation of access, i.e. each user may use the IT systems and services of the Data Controller only to the extent necessary for the performance of their task, with the corresponding rights and for the necessary duration. Access to IT systems and services is restricted to persons who are not restricted for security or other reasons (e.g. conflict of interest) and who have the professional, business and information security skills necessary to use them safely.

The Data Controller and the data processors undertake in a written declaration to observe strict confidentiality rules and to act in accordance with these confidentiality rules in the course of their activities.

b. Technical measures

With the exception of the data stored by its data processors, the Data Controller stores the data on its own equipment, in a data centre. The IT tools storing the data are stored by the Data

Controller in a separate, locked server room, protected by a multi-level access control system with access control and authorisation.

The Data Controller protects its internal network with multiple layers of firewall protection. In all cases, hardware firewalls (boundary protection devices) are always installed at the entry points to the public networks used. The Data Controller stores the data redundantly - i.e. in several locations - to protect them from destruction, loss, damage or unlawful destruction due to the failure of the IT device.

We protect our internal networks from external attacks with multiple layers of active, complex malware protection (e.g. virus protection). The Data Controller provides the necessary external access to the IT systems and databases operated by the Data Controller via encrypted data connection (VPN).

We do our utmost to ensure that our IT tools and software are always in line with the technological solutions generally accepted in the market.

We are developing systems that use logs to control and monitor operations and detect incidents such as unauthorised access. The Data Controller's server is located in a secure and closed location.

IV. YOUR RIGHTS

It is important for the Data Controller that its processing complies with the requirements of fairness, lawfulness and transparency. Therefore, you may request information about the processing of your personal data, request the rectification or, with the exception of mandatory processing, the erasure of your personal data, withdraw your consent, exercise the right to data portability and exercise your right to object. The data subject may exercise their rights by using the contact details of the Data Controller indicated in section I. To help you understand your rights and how to exercise them, we provide you with the following information.

a. Withdrawal of consent

In the case of data processing based on consent (applicant registration), you have the right to withdraw your consent at any time, without giving any reason. Withdrawal does not affect the lawfulness of processing based on consent prior to the withdrawal. However, the Data Controller will no longer carry out operations using your personal data and will delete them.

b. Access

You have the right to obtain access to your personal data processed by the Data Controller, upon request, by contacting the Data Controller at one of the contact details of the Data Controller. You will be informed of the following:

- whether your personal data are being processed;
- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be communicated;
- the intended duration of the storage of the personal data;
- your rights;
- your legal remedies;
- information on data sources.

You may also request the Data Controller to provide you with a copy of the personal data subject to processing. In this case, the Data Controller will provide the personal data in a structured, commonly used, computer-readable format (PDF/XML) or in a printed paper version. You can request a copy free of charge.

c. Rectification

You have the right to request, on the basis of a request made through the contact details of the Data Controller, the rectification of inaccurate personal data concerning you processed by the Data Controller and the completion of incomplete data. If the information necessary to clarify or supplement any inaccurate information is not available to the Data Controller, the Data Controller may request

the submission of additional data, verification of the accuracy of the data. As long as the clarification or completion of the data - in the absence of the additional information - cannot be performed, the Data Controller shall restrict the processing of the personal data concerned, temporarily suspend the operations performed on them, with the exception of storage.

d. Erasure

You have the right to request the erasure of personal data concerning you processed by the Data Controller, on the basis of a request submitted through the contact details of the Data Controller, if one of the following conditions applies:

- we no longer need that data;
- you have concerns about the lawfulness of our processing of your data.

If, following your request, the Data Controller determines that there is an obligation to erase the personal data processed by it, it shall cease processing the data and destroy the personal data previously processed. In addition, the obligation to erase personal data may be based on the withdrawal of consent, the exercise of the right to object or legal obligations.

e. Restrictions of processing

You have the right to request, on the basis of a request made through the contact details of the Data Controller, the restriction of the processing of personal data concerning you processed by the Data Controller in the following cases:

- you are concerned about the lawfulness of the processing of personal data relating to you by the Controller and request the restriction instead of the deletion of the data;
- we no longer require the given data, but you require them for the submission, enforcement or defence of legal claims

The Controller will automatically restrict the processing of personal data in the event that you contest the accuracy of the personal data. In this case, the restriction applies for the period of time that allows the accuracy of the personal data to be verified.

During the period of restriction, no processing operations may be performed on the personal data concerned, the data may only be stored. Personal data may only be processed in the following cases of restriction of processing:

- based on the consent of the data subject;
- for the submission, enforcement or defence of legal claims;
- protecting the rights of another natural or legal person;
- important public interest.

The Data Controller will inform you in advance of the lifting of the restriction.

f. Data portability

You have the right to request, on the basis of a request made through the contact details of the Data Controller, the provision of personal data concerning you processed by the Data Controller for further use as you have specified. You may also request the Data Controller to transfer your personal data to another controller designated by you.

This right is limited to the personal data provided by you that we process on the basis of your consent or for the performance of a contract. No other data portability is possible. The Data Controller provides personal data in a structured, commonly used, computer-readable format (PDF/XML) or in a printed paper version.

The Data Controller informs you that the exercise of this right does not automatically entail the deletion of your personal data from the Data Controller's systems. You also have the right to contact or communicate with the Data Controller again after the data have been transferred.

g. Objection

You may object to the processing of your personal data by the Data Controller at any time on the basis of a request made through the contact details of the Data Controller. In such a case, the Data Controller shall examine whether there are compelling legitimate grounds or interests (e.g. the establishment, exercise or defence of legal claims) which override the interests, rights and freedoms of the data subject. Where such grounds or interests can be identified, the Controller will continue to process the personal data. Otherwise, the personal data may no longer be used.

h. Our procedure regarding your request to exercise your rights

The Controller will inform you of the action taken in response to your request to exercise your rights without undue delay and within a maximum of 1 month of receipt of the request. This deadline may, however, be extended by 2 months if warranted by the complexity of the request or the number of requests. The Controller shall notify you of any such extension within 1 month of receiving the request; such a notification shall include the reason of the extension.

If the Controller does not take action on your request, it will inform you without delay and at the latest within 1 month of receipt of the request of the reasons for the lack of action and of the possibility for you to lodge a complaint with a supervisory authority and exercise your right to judicial remedy.

The Data Controller will provide information about the action or failure to take action in the form you specify. If you have submitted your request by electronic means, the information will be provided by electronic means unless you request otherwise.

The Controller will provide the requested information and communications free of charge as a general rule, but may charge a reasonable fee based on administrative costs for additional copies requested by you.

The Controller shall inform any recipient to whom or with whom the personal data have been disclosed of any rectification, erasure or restriction of processing performed by it, unless this proves impossible or involves a disproportionate effort. Upon your request, the Controller will inform you of these recipients.

In order to comply with the request, the Controller shall ensure that it is truly the data subject who intends to exercise his or her rights. This may also require, where appropriate, that you appear in person at the Controller's registered office for identification purposes.

V. YOUR LEGAL REMEDY OPTIONS

If the Controller processes your personal data in an inappropriate manner, contrary to the law, or if the Controller has not complied with your request to exercise your rights or has not complied with them in an appropriate manner, you have a number of legal remedy options.



a. complaint submission to the National Authority for Data Protection and Freedom of Information

If you object to the activities of the Controller, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information at one of the following contact details:

- Registered office: 1055 Budapest, Falk Miksa utca 9-11.
- Postal address: H-1363 Budapest, Pf. 9.
- Telephone: +36-1-391-1400
- Fax: +36-1-391-1410
- E-mail: ugyfelszolgalat@naih.hu
- Website: <http://www.naih.hu>
- Start a case online: <https://www.naih.hu/online-ugyinditas>

b. Judicial remedy

You also have the right to take legal action against the Data Controller's actions, in addition to the administrative remedies. The GDPR, the Infotv. and the rules of the Civil Code and the Civil Code apply to the lawsuit. The case falls within the competence of the general court. The lawsuit may also be brought, at the option of the data subject, before the general court in whose jurisdiction the data subject's home address is located (for a list of courts and their contact details, please see the following link: <http://birosag.hu/torvenyszekek>). Please consult a lawyer about any questions you may have about how to start a lawsuit.