

Data Processing Notice

HUPX Hungarian Power Exchange Company Limited by Shares (registered office: 1134 Budapest, Dévai u. 26-28, company registration number: 01-10-045666, tax number: 13967808-2-41, contact: info@hupx.hu, hereinafter as: “**Data Controller**”) shall describe the data processing actions implemented in relation to the menu item “Career” of the website operated by it (<https://hupx.hu>) (hereinafter as: “**Website**”) in this Data Processing Notice (hereinafter as: “**Data Processing Notice**”).

This Data Processing Notice was prepared in line with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter as: **GDPR**), with due consideration of the provisions of Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter as: “**Information Act**”) as well, and the terms and expressions used herein shall be interpreted according to the definitions specified in Article 4 of the GDPR, and – in certain Sections – in Article 3 of the currently effective Information Act.

As data subject, you may at any time request detailed information on the processing of your personal data or access your personal data, request their rectification, erasure or restriction of their processing, and may object to the processing of personal data and exercise your right to data portability. Please be informed that you have the right to withdraw your consent at any time.

In the event you disapprove of the processing of your personal data by the Data Controller or would like to receive more detailed information about processing of your personal data, you may contact the Data Controller directly by sending your request to dataprotection@hupx.hu. Should you have any complaints, you may contact directly the Hungarian National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, mailing address: 1530 Budapest, Pf.: 5. E-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu) or refer your case to court (regional court) in order to protect your data, and the court will address your case in an accelerated procedure.

Please find below the key provisions related to the processing of your data. This Data Processing Notice provides information only and exclusively in terms of the menu item “Career”. For more detailed information about your rights as data subject, the way these rights can be exercised and the legal remedies, please read by all means the Data Processing Notice available on the Website of the Data Controller (<https://hupx.hu> menu item titled “Data Protection”)!

Data processing related to job applications

During the selection of employees, Data Controller processes personal data. Applicants may apply for different vacancies under the menu item of the Website titled “Career”.

Data processing is carried out on the basis of the prospective employee’s prior informed voluntary and explicit (for sensitive data: written) consent. Data Controller shall ensure to the data subject the right to withdraw their processing consent at any time. After the Data Controller

was notified of the withdrawal, the Data Controller shall discontinue the processing of the data subject's personal data, and destroy or erase the personal data, except if the data subject requests the restriction of processing.

As a general rule, the Data Controller shall not process the CVs sent during the application process for later use, hence after the application process is closed, these CVs shall be erased within 3 working days after the notice on rejection of the job application was sent. The CV of the rejected applicant shall only be retained by the Data Controller for the maximum period of 1 year, if this is expressly consented by the applicant.

Further processing of the data of the data subject selected on the basis of the CV will already take place for the purpose of establishing the employment relationship, hence the related data processing actions shall be subject to the Data Controller's relevant internal policies and documents, namely the Privacy Policy and the Data Processing Notice prepared for the employees.

If, during the recruitment process, the data subject requests that their reduced working capacity be taken into account in relation to the job search and the employment in the available posts of employment, and submit a copy of the expert report issued by the expert body, then all data – except for the identification data and the extent of the change in work capacity, health status, and health damage – should be deleted, such as data on the nature of health damage, medical treatments, and illnesses. Should the data subject request this from the Data Controller but fail to submit this request in writing to the Data Controller, the Data Controller shall be obliged to obtain the written declaration of consent from the data subject for the processing of the respective data, following the receipt of the data (the medical records), at the latest.

Purpose of data processing	Selection of suitable prospective employees to fill vacant posts of employment.
Scope of processed data	Applicant's name, e-mail address, phone number, designation of the concerned post of employment, the data specified in the CV or in the motivation letter (if any), typically identification data, such as name, place of birth, time, mother's name, address, copy of the document evidencing qualifications, training data (education, qualification, professional experience, level of language proficiency, degrees, average result of the grammar school graduation exams, etc.), needs related to the position to be filled, previous jobs, references, photo, other data provided by the data subject in the CV. If the data subject requests the Data Controller to take into account – upon considering filling the vacancy – the data subject's sensitive personal data, then the data on reduced working capacity (the expert opinion issued by the expert body on the degree of change in work capacity, health condition, health damage, and the fact of disability).
Scope of data subjects	The persons sending job applications (CV) to the Data Controller.

Legal basis of processing	Consent from the data subject as per Article 6(1)(a) of the GDPR and Article 9(2)(a) of the GDPR.
Time limit for data storage	Until the consent of the data subject is withdrawn, until the selection of the appropriate candidate. If the application is rejected, until 3 working days following the sending of the notice on rejection of the job application to the concerned applicant. If the data subject grants his/her consent to the Data Controller's retaining of his/her CV, until the consent is withdrawn, but in any case for maximum 1 year.
Method of data processing	On hard copy (paper) or electronically.
Source of the data	Data collected from the data subject.
Possible consequences of failure to provide the data	The provision of personal data shall be a precondition of the selection process, and therefore if the data subject fails to provide the data to the Data Controller, the Data Controller will not be able to conduct the selection process in terms of the data subject.
Automated decision-making and profiling	The Data Controller does not perform any automated decision-making or profiling.
Who can access the personal data?	The Data Controller's competent co-workers.
Data transfer to third countries or to international organisations	No data are transferred to third countries or to international organisations.