

E-Dimension Ltd.

General data protection

The **E-Dimension Ltd.** (in further: „**Company**”) informs job seekers, and those people, whose personal data the Company has to give to other future agents and other subcontractors to handle their personal data, and inform them about their data protections rights.

For the Company’s data management and personal data management the following rules apply the 2016/679 European parliament and council (further: „**GDPR**”) rule, and the 2011. CXII. info law and other sectoral legislations apply.

1. Definitions

Personal data: identified or identifiable any information that relates to a natural person. An identifiable person is someone who directly or indirectly has some identifying marks, e.g. four digits, location data, online identification, bodily, physiological, genetically, intellectual, economic, cultural or other social marks, that can be identified.

Data management: operations carried out on personal data or data collections in an automated or non-automated way, such as collection, recording, sorting, storing, changing or converting, retrieval use, disclosure, transmission, dissemination or otherwise making available by means, alignment or interconnection, restriction or destruction.

Concerned: any specific personal information based on an identified or directly or indirectly identifiable natural person.

Data manager: that natural or legal person, public authority, agency or other body, who the personal data treatment’s purpose and assets independently or jointly with other determines; if the purposes and means of data management are defined by Union or Member State law, the data manager or the appointment of data manager has specific aspects and can be determined by the union or the member state law.

Data processor: the natural or legal person, public authority, agency or any other body which on behalf of the data manager controls personal data,

Recipient: a natural or legal person, public authority, agency or any other body with whom or which the personal data are communicated to

Consent of the concerned person: the concerned persons voluntary free will give the specific information, with which the person can give a relevant statement or the confirmation unmistakably expressive act by indicating that consent to the personal data treatment.

2. Data of the data manager:

Data manager name::	E-Dimension Ltd.
Data manager registration number	06-09-019082
Headquarters:	6726 Szeged, Kertész street 4.
Data manager’s electronic availability:	norbert_loki@edimension.eu

Representative: **Norbert Béla Lóki, manager**

Contact information for the person responsible for data protection: **Norbert Lóki**
adatvedelem@edimension.eu

3. Information on Your personal data treatment

3.1. Job applicant's data

Information about data management	
range of managed data	name, place of birth and time, name of mother, address, skill data, photo, other data given by the applicant
aim	filling vacant positions
who can know the data	the manager, the administration manager, the job openings with the concerned organizational unit and the prospective immediate supervisor data processor commissioned by the company administrator for maintenance purposes
legal basis	<ul style="list-style-type: none">- applicants contribution (GDPR 6. (1) paragraph point a)- the employment potential for the creation of necessary steps at the request of the applicant (GDPR 6. (1) paragraph point b)
duration	<ul style="list-style-type: none">- advertised jobs and recruiting in the case of incoming applications and interview was unsolicited applicant in the case of the job load within 3 months of the recording, but possibly during the period of probation not become a new employee in place the application of the company's choice- for unsolicited applications, the applicant must be permanently cancelled or invited to participate in a job interview within 7 days of the receipt of the application, where his / her contribution must be obtained for further processing
means of data storage	on paper and electronically
obligation to give data	giving the data is not mandatory but without it we cannot evaluate the applicant's application and it is indispensable to enter the contract of employment, without the data there cannot be an employment contract

3.2. Personal data of third parties

Information about data management	
range of managed data	the privileges and discounts in order to benefit from statutory data by the employee designated third party contact necessary data to third persons personal data
aim	some employment-related privileges and discounts to avail of a work accident in case of accident notifying a pre specified person
who can know the data	the manager, the administration manager, as data processor commissioned by the company administrator and the relevant computer program developer for maintenance purposes
legal basis	<ul style="list-style-type: none">- contribution of a third party (GDPR 6. (1) paragraph point a) or failing that- the employee's legitimate interest (GDPR 6. (1) paragraph point f) a legitimate interest in some employment-related privileges and discounts to avail of a work accident in case of accident notifying a pre specified person

duration	<ul style="list-style-type: none"> - contact information in the event of employment termination within 7. days - taxation or social insurance-related data in case of 8 years (the accounting documents retention of a requirement of time)
means of data storage	on paper and electronically
obligation to give data	giving up data for the third party is not mandatory. If the data is not given up, the employee cannot use their own rights, e.g. there will not be an emergency contact, or you will not be able to use the social allowance, etc.

3.3. Sub-contractor data

Information about data management	
range of managed data	<ul style="list-style-type: none"> - <u>by company personal or subcontractor</u> <ul style="list-style-type: none"> - contact person's name, company email, phone number - details of the person actually performing the work: photo ID photocopied, name, place of birth, ID number, medical fitness, attendance at work safety training - <u>natural person contracting partner</u> photo ID, name, address, place of birth, date of birth, name of mother, ID number, medical fitness, attendance at work safety training
aim	<ul style="list-style-type: none"> - establishment and handover of contract - after the handover of the contract after any possible warranty claims in case of intended evidence - the company's customers and contractual obligations to fulfil data of the people appearing for work the Company's customer as the data manager can identify the appeared, can check if they have job aptitude certificate and received-work protection education
who can know the data	<ul style="list-style-type: none"> - executive, administrative manager, quality manager - the company's customers as data controllers, in which case, before the transfer of the trustee or the sub-contractor shall be informed of the data transfers, , if the data transmission to a country outside the EU takes place, the trustee or the sub-contractor shall be informed of the GDPR chapter V. guarantees
legal basis	<ul style="list-style-type: none"> - <u>by Company personnel or subcontractor</u> contact details in respect of the contracting partner's legitimate interests based on legislative authorization (GDPR 6. paragraph (1) point f) legitimate interest contract fulfilment contact person designation - <u>natural person or subcontractor: legislative delegation contract in order to fulfil (GDPR 6. paragraph (1) point b)</u> - <u>after handover the company's legitimate interests based on legislative authorization (GDPR 6. paragraph (1) point f)</u> legitimate interest any warranty claims in case of intended evidence - <u>people</u> who appear on the worksite the details of the company's customers with regard to the transmission of the company's legitimate interests and the customer's legitimate interests (GDPR 6. paragraph (1) point f) - legitimate interest: <ul style="list-style-type: none"> o company legitimate interests of contractual obligation can be fulfilled in the order towards o legitimate interest of the person who ordered,, the supervised areas of the entrants identity, job competence, job protection, education verification, and register of official control, or an emergency, incident cases of

duration	- 5 years of the contract following the termination of the contract arising from considerations of the statute of limitations
means of data storage	on paper and electronically
obligation to give data	The data specifying the performance of the contract is essential, the data can be handled without consent, on the basis of a statutory authorization based on a legitimate interest. If the concerned does not give data there will be no contract, and the concluded contract will be terminated, if the work is appearing in person details will not be given, then the displayed person is not allowed to start the work, in which case the contracting partner, the contract is terminated and the company may claim arises against the contracting partner.

3.4. Business partner data

Offer stage

Information about data management	
range of managed data	<ul style="list-style-type: none"> - corporate contracting partner contact name, company email address, company phone number - natural person contracting partner name, e-mail address, phone number, place and date of birth, mother's name, place of residence - for marketing purposes the name, company email address, company phone number, without birthday dates
aim	<ul style="list-style-type: none"> - treaty of establishment of the offer on the basis - offer in relation to demand validation or defence dispute case - marketing for the purpose of future contract
who can know the data	manager, customer contact person as data processor commissioned by the company administrator and the relevant computer program developer for maintenance purposes
legal basis	<ul style="list-style-type: none"> - <u>corporate contracting partner</u> at the contact details in respect of the contracting partner's legitimate interests based on legislative authorization (GDPR 6. paragraph (1) point f) - a legitimate interest in creating a contract, offer, relationship, needs validation or defence dispute case - <u>a natural person contracting partner</u> statutory mandate for the creation of a partnership contract prior to the conclusion of the contract to take action at the request of the person concerned (GDPR 6. paragraph (1) point b) - <u>marketing</u> consent of the concerned (GDPR 6. paragraph (1) point a)
duration	<ul style="list-style-type: none"> - the tender procedure after completion of 5 years (civil claims the general limitation period) - in the case of marketing management in the event of withdrawal
means of data storage	on paper and electronically
obligation to give data	it is not mandatory to give data, but without it we cannot give an evaluation of received offer, for the contract it is essential, the marketing objective in the case of the data is optional. If the data will not be given to our partner, we can't find you with our offers

Contractual stage

Information about data management

range of managed data	<ul style="list-style-type: none"> - company person contracting partner contact the designated person's name, company email address, company phone number - a natural person contracting partner's name, place of birth and time, name of mother, residence, telephone number, e-mail address
aim	<ul style="list-style-type: none"> - making contract and handover, - beginning of the contract, after any possible warranty claims in case of intended evidence - aim is marketing
who can know the data	<ul style="list-style-type: none"> - manager, contact for customers - as data processor commissioned by the company administrator and the relevant computer program developer for maintenance purposes
legal basis	<ul style="list-style-type: none"> - <u>corporate contracting partner</u> at the contact details in respect of the contracting partner's legitimate interests based on legislative authorization (GDPR 6. paragraph (1) point f) legitimate interest contract fulfilment contact person designation - <u>natural person</u> contractual partner is a statutory mandate for the performance of the contract_(GDPR 6. paragraph (1) point b) - <u>after handover</u>: the company's legitimate interests based on legislative authorization (GDPR 6. paragraph (1) point f) legitimate interest any warranty claims in case of intended evidence - <u>marketing</u>: contribution from the company to the contact person and to the contact person of the natural person for the period after the performance of the contract for marketing purposes (GDPR 6. paragraph (1) point a)
duration	<ul style="list-style-type: none"> - the tender procedure after completion of 5 years (civil claims the general limitation period) - in the case of marketing management in the event of withdrawal
means of data storage	on paper and electronically
obligation to give data	The data specifying the performance of the contract is essential, the data can be handled without consent, on the basis of a statutory authorization based on a legitimate interest. If the concerned does not give data there will be no contract, and the concluded contract will be terminated, if the work is appearing in person details will not be given, then the displayed person is not allowed to start the work, in which case the contracting partner, the contract is terminated and the company may claim arises against the contracting partner..

4. The rights of those concerned

The claims against the Company regarding the enforcement of the rights of the company in connection with data management concern the Company's manager (norbert.loki@edimension.eu) or send an email to the data management responsible person (adatvedelem@edimension.eu).

Rights:

The right to information (right of access)

At the request of the concerned the Company must give information whether or not the Company manages any data about that person, if yes the following must be communicated:

- a) aim of data management

- b) categories of personal data,
- c) those recipients or recipient groups, to whom the data will be given
- d) a personal data will be stored planned duration, or if this is not possible, this period for the determination of aspects of
- e) the right of the concerned is to ask for a correction of data from the weekly manage, to delete, manage or object against processing personal data;
- f) the right to give complaint to NAIH
- g) if the data is not the data subject is collected, the source of their all relevant available information
- h) if a third country or international organisation transmission of data to take place

The company provides the person concerned free of charge with the necessary information within 30 days of the receipt of the application by the person responsible for data protection. The company's personal data, a copy of the request concerned is made available to you. If you electronically submitted your application, the above information must be made in available in electronic form, except if the concerned asks otherwise. If the Company does not do any measurements immediately for the request of the concerned party, but no later than receipt of the requests within 30 days, it shall inform the person within 30 days, as well as the fact that the concerned complaint can be filed at the NAIH and may exercise its right of judicial redress.

Concerned the application in any form may be communicated to or representative you can trust to do his will. All applications should be examined for the identity of the applicant and the eventual representative of identity and representation entitlement, i.e. typically the power of attorney. If the applicant or his authorized representative has successfully been identified and the authorized representative's right is justified, he may be given the requested information. no one can request data from another person without authorization. The data services you need to fulfil to any other person information or the company's business secrets should not be known. The data service preferably in the form should be completed as the relevant request, at the same time cost-saving reasons, the electronic transfer should be preferred provided that the concerned will accept that. If the request comes electronically it can be deleted without any further questions. The original document cannot be sent out. The provision of data is free of charge, except in the case of abusive, unreasonable, exaggerated or repeated requests, a justified cost reimbursement may be requested.

Right to rectification

At the request of the concerned person the Company must correct the inaccurate personal data without delay, or if the purpose of the data collection is justified by the incomplete personal data concerned in the additional statement of basis supplement.

Right to erase

The concerned has the right a Law 17. article (1) paragraph of cases recorded at the request of the company, without undue delay, delete the relevant personal data. If the company disclosed the personal data, it is required to delete it, and needs to take the necessary steps – meaning technical steps- – in order to inform the data manager, other controllers, to the applicant concerned from the relevant personal data, links or personal data, a copy of, or of a duplicate cancellation.

Restricting rights to data management

The concerned has the right Law 18. article (1) in these cases the Company can limit the data management. The Company notifies the person who asked for the restriction, when this is cancelled.

The company, any recipients informed of all rectification, cancellation or data management-restriction, with whom or which the personal data have been disclosed, unless this proves impossible or involves a disproportionate effort. The company, upon request, informs the person concerned who these recipients are.

Data transfer right

The concerned have the right Law 20. article. (1) in these cases the Company gets personal data, this should be in a computer readable format, and these can be forwarded to other data manager. The company-where this is technically feasible- at the request of concerned the personal data will be forwarded directly to the designated data manager.

Right to protest

The person concerned has the right to object to personal information at any time a Law 6. article (1) paragraph e) or f) points. In this case the Company can manage the data further if it proves to the controller on compelling legitimate reasons, which are priority interests, and are against rights and freedom or that legal claims presented to, exercised or defended.

5. Complaint

You can contact the following organisation regarding the Company's data management activity.

name: National Data Protection and Freedom of Information Authority

location: 1024 Budapest, Szilágyi Erzsébet fasor 22/C.

web: www.naih.hu

6. Right to turn to court

The concerned according to Infotv. 23. § with the Company's data management Infotv. 23. § regulations can turn to court, if the person concerned considers that the company handles his or her personal data in violation of the legal provisions governing the processing of personal data or in the mandatory legal act of the European Union.

7. The personal information-related rights concerned, following the death of the concerned

After the death of the affected, within five years has to give the rightful information, , correction, delete, data management, restrictions, denial, rights of the concerned given by the administrative provision, or in an authentic instrument or private document providing full evidence set out in the company by a declaration - if the person concerned has made more than one statement with the company at a later date, the authorized person is entitled to enforce this.

If the person concerned did not make the right statement as described above, according to Ptk. if the next of kin is missing rectification must be done within five years is - if the data was already illegal in the life of the data concerned or the purpose of the data management was terminated with the death of the person concerned – to delete and limit, the rights while living. For the purposes of this section of the rights of the person who is entitled to exercise this right is the person to whom that right is exercised.

The person enforcing the rights of the person concerned confirms the fact and the date of the death of the person concerned by a death certificate or judicial decision and his / her identity and, if necessary, the close relative status of the person concerned.

The Company informs the concerned by request according Ptk. the next of kin is informed of these measurements, except if the person concerned has prohibited it in a statement as defined above.