PRIVACY NOTICE

to collect Evaluator lead data online

1. Joint data controllership (BARE International)

1.1. Joint data controllers

BARE International Inc. and subsidiaries (according to Appendix 2)
hereinafter "**Controllers**" or "**Controller**" or "**BARE International**" hereafter;
of which

BARE International Hungary Limited Liability Company
For headquarters and postal address click HERE
Company registration number: 01-09-962318
E-mail address: dataprivacy@bareinternational.com
represents primarily the joint data controllers to the Data Subjects.

1.2. Data protection officer

In connection with joint data processing, the duties of the data protection officer are performed by the data protection officer of BARE International Hungary Kft.

BARE International Hungary Korlátolt Felelősségű Társaság

short name: BARE International Hungary Kft.
headquarters: Annex 1
business registration: 01-09-962318
tax number: 23368743-2-41
e-mail address: BAREeurope@bareinternational.com
website: https://www.bareinternational.eu/
hereinafter: **Controller**

1.3. The collection of data is maintained jointly by Controllers. Every Controller takes part of the maintenance of the data collection, they define the processing rules together.

1.4. During joint data processing, BARE International Hungary Kft. performs the tasks related to the individual information of the interested parties and the exercise of their rights.

1.5. The Controllers have appointed BARE International Hungary Kft. as contact in connection with data protection issues related to joint data processing. Data protection issues can be addressed to the Controllers primarily at the following contact details:

BARE International Hungary Kft.

E-mail address: dataprivacy@barienternational.com
Postal address: Annex 1
In addition, the Data Subject can indicate his/her needs and exercise his/her rights in relation to joint data processing to any Controller.

1.6. With regard to data transfer to third countries during the joint data processing, the Controllers comply with the European Commission (EU) on the general contractual conditions for the transfer of personal data to third countries in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council) the contract conditions defined by EXECUTIVE DECISION 2021/914 (June 4, 2021) are applied. The Controllers have put into effect the terms of the referenced general contract with respect to each other and comply with the conditions of application. The joint Controllers have agreed upon the additional conditions of joint data processing

2. Legislation applied during data processing

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (April 27, 2016) on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and on the repeal of Directive 95/46/EC (general data protection regulation); (The EU General Data Protection Regulation - The General Data Protection Regulation of the European Union), (hereinafter: GDPR

3. Scope of the notice, natural persons concerned by data processing

3.1. For the purpose of maintaining an effective and useful potential evaluator database that allows high quality services to Clients, Controllers collect personal data of potential evaluators (hereinafter: **Evaluator Lead Database**) by connecting them through online surfaces for the purpose of future cooperation.

3.2. The scope of this Privacy Notice applies to data related to the collection of data regarding potential evaluators.

3.3. Scope of Data Subjects: potential evaluators providing their personal data during the data collection process (hereinafter: **Data Subject**).

4. Details of data processing related to data collection

4.1. The personal data provided is only accessible to dedicated staff of BARE International.

4.2. Concerned parties in data processing: Data Subjects providing their personal data during the collection process.

4.3. Legal basis of data processing: Data Subject's consent according to Article 6 Paragraph (1), Point a) of the GDPR.

Data Subject has the right to withdraw his/her consent anytime. Withdrawal of the consent does not affect the legality of data processing before the withdrawal.

4.4. Scope of processed data: Data Subject's
- first and last name,
- phone number,
- email address,
- city,
- country,
- and the willingness to travel to perform assignments.

4.5. Purpose of data processing: collecting evaluator lead data in purpose of future cooperation.

4.6. Duration of data processing: the duration of data processing lasts until the withdrawal of the consent, but no longer than three month.

4.7. Method of data storage: electronically in Conroller's IT system.

5. Forwarding data

5.1. The data will not be forwarded.

5.2. Controllers forward information only to official bodies in accordance with legal requirements beyond the above-mentioned cases.

6. Recipients (use of processors)

6.1. Provider of electronic hosting, e-mailing service and Office applications

6.1.1. Scope of Data Subjects: Data Subjects indicated in this notice.

Controller uses:

Microsoft Ireland Operations Limited

Business registration:	256796
Tax number:	IE8256796U
Headquarters:	70 Sir Rogerson's Quay, Dublin 2, Ireland
Postal address:	One Microsoft Place, South County Business Park, Lopardstown, Dublin 18, Ireland
Telephone:	+1 800 710 200
Website:	https://www.microsoft.com/

(hereinafter: **Processor**).

6.1.2. Scope of data processed by the Processor: data indicated in this notice, content of e-mails.

6.1.3. The purpose of using the Processor: ensuring technical conditions necessary for data processing and e-mailing.

6.1.4. Nature of data processing: electronically in a software environment provided by Controller.

6.2. Social media platform provider (Facebook and Instagram):

6.2.1. Scope of Data Subjects: Data Subjects indicated in this notice.

6.2.2. The Controller uses the service provider and software developer of Facebook and Instagram social media platforms as Processor:

data processing related to Data Subjects located in the EU:

Meta Platforms Ireland Ltd.

registration number:	462932
VAT number:	IE 9692928F
registered office:	Merrion Road, Dublin 4, D04 X2K5, Ireland
mailing address:	Merrion Road, Dublin 4, D04 X2K5, Ireland
connection:	https://facebook.com/help/contact/540977946302970

website: https://www.facebook.com/privacy/explanation

data processing related to Data Subjects located outside the EU:

Meta Platforms, Inc.

registered office: 1601 Willow Road, Menlo Park, CA 94025
mailing address: 1601 Willow Road, Menlo Park, CA 94025
connection: https://facebook.com/help/contact/540977946302970
website: https://www.facebook.com/privacy/explanation
(hereinafter: **Processor**).

6.2.3. The purpose of using the Processor: to reach the potential evaluators through social media advertisements about Controller's evaluator program and to provide the form that the Data Subjects can fill out in order to become potential evaluators.

6.2.4. Data processed by the Processor: the data indicated in this notice.

6.2.5. Nature of data processing: electronically.

6.3. Social media platform provider (X)

6.3.1. Scope of Data Subjects: Data Subjects indicated in this notice.

6.3.2. The Controller uses the service provider and software developer of the social media platform as Processor:

data processing related to Date Subjects located in the EU, EFTA or UK:

X Internet Unlimited Company

registration number: IE503351
VAT number: IE9803175Q
registered office: One Cumberland Place, Fenian Street
Dublin 2, D02 AX07 IRELAND
mailing address: One Cumberland Place, Fenian Street
Dublin 2, D02 AX07 IRELAND
connection: https://www.dataprotection.ie/contact/how-contact-us
website: https://x.com

data processing related to Data Subjects located in the US or an other country outside the EU, EFTA, or UK:

X Corp.

registered office: 865 FM 1209, Building 2 Bastrop, TX 78602
mailing address: 865 FM 1209, Building 2 Bastrop, TX 78602
connection: https://www.dataprotection.ie/contact/how-contact-us
website: https://x.com
(hereinafter: **Processor**).

6.3.3. The purpose of using the Processor: to reach the potential evaluators through social media advertisements about Controller's evaluator program and to provide the form that the Data Subjects can fill out in order to become potential evaluators.

6.3.4. Data processed by the Processor: the data indicated in this notice.

6.3.5. Nature of data processing: electronically.

6.4. Social media platform provider (LinkedIn)

6.4.1. Scope of Data Subjects: Data Subjects indicated in this notice.

6.4.2. The Controller uses the service provider and software developer of the social media platform as Processor:

data processing related to Data Subjects located in the EU, EEA, UK, Switzerland:

LinkedIn Ireland Unlimited Company
reg. number: 477441
VAT number: IE 9740425P
registered office: Wilton Place, Dublin 2, Ireland
mailing address: Wilton Place, Dublin 2, Ireland
connection: https://www.linkedin.com/help/linkedin/ask/TSO-DPO
website: https://www.linkedin.com/

data processing related to Data Subjects located outside of the EU, EEA, UK, Switzerland:

LinkedIn Corporation

tax ID: 47-0912023
registered office: 1000 West Maude Avenue, Sunnyvale California, 94085
mailing address: 1000 West Maude Avenue, Sunnyvale California, 94085
connection: https://www.linkedin.com/help/linkedin/ask/PPQ?lang=en

website: https://www.linkedin.com/
(hereinafter: **Processor**).

6.4.3. The purpose of using the Processor: to reach the potential evaluators through social media advertisements about Controller's evaluator program and to provide the form that the Data Subjects can fill out in order to become potential evaluators.

6.4.4. Data processed by the Processor: data indicated in this notice.

6.4.5. Nature of data processing: electronically.

6.5. Business management software used to coordinate work tasks during the organization and conduction of evaluator lead data collection (Jira):

6.5.1. Scope of Data Subjects: Data Subjects indicated in this notice.

6.5.2. The Controller uses the business management software developer as Processor:

data processing related to Data Subjects located in the European Union:

Atlassian B.V.
registered office: 350 Bush Street, Floor 13 San Francisco, CA 94104
mailing address: 350 Bush Street, Floor 13 San Francisco, CA 94104
e-mail: eudatarep@atlassian.com

Data processing related to Data Subjects located outside the European Union:

Atlassian Pty Ltd
registered office: 350 Bush Street, Floor 13 San Francisco, CA 94104
mailing address: 350 Bush Street, Floor 13 San Francisco, CA 94104
e-mail: privacy@atlassian.com
(hereinafter: **Processor**).

6.5.3. The purpose of using the Processor: Controller uses the service of Processor in order to increase the efficiency of coordination of work tasks during the organization and conduction of evaluator lead data collection.

6.5.4. Data processed by the Processor: data indicated in this notice.

6.5.5. Nature of data processing: electronically.

6.6. Provider of the instant message software:

6.6.1. Scope of Data Subjects: from among the Data Subjects indicated in this notice those who are located in China.

6.6.2. The Controller uses the instant message management software provider as Processor:

Shenzhen Tencent Computer Systems Co., Ltd

registration number:	91440300708461136T
registered office:	Tencent Binhai Building, No. 33, Haitian Second Road, Shenzhen, China
mailing address:	Tencent Binhai Building, No. 33, Haitian Second Road, Shenzhen, China
connection:	dataprotection@tencent.com
website:	https://www.tencent.net.cn/products/wecom/

(hereinafter: **Processor**).

6.6.3. The purpose of using the Processor: Controller uses the service of Processor in order to be able to communicate with Data Subjects in text messages.

6.6.4. Data processed by the Processor: data indicated in this notice, content of text messages.

6.6.5. Nature of data processing: electronically.

6.7. Provider of the instant message management software:

6.7.1. Scope of Data Subjects: from among the Data Subjects indicated in this notice those who are located in China.

6.7.2. The Controller uses the instant message management software provider as Processor:

Wuhan Congxin Information Technology Co., Ltd

registered office:	C404, Building 2, No. 70, Guanggu Avenue, East Lake New Technology Development Zone, Wuhan City, Hubei Province

mailing address:	C404, Building 2, No. 70, Guanggu Avenue, East Lake New Technology Development Zone, Wuhan City, Hubei Province
e-mail:	iwan@weiyoubot.com
website:	https://weiyoubot.com/

(hereinafter: **Processor**).

6.7.3. The purpose of using the Processor: Controller uses the service of Processor in order to be able to communicate with Data Subjects in text messages.

6.7.4. Data processed by the Processor: data indicated in this notice, content of text messages.

6.7.5. Nature of data processing: electronically.

6.8. Controller uses no other Processors apart from the ones described above.

6.9. Controller enters into data processing contracts with mandatory content with Processors used by Controller in order to comply with relevant legislation and to guarantee an adequate level of data security.

7. Data protection, data safety

7.1. Controller assures the safety of data through technical and organizational actions, as well as internal rules of procedure ensures that laws and other data and secret protection rules are kept. Controller protects data especially against illegal access, change, forwarding, making public, and deletion. It also protects against accidental effacement and damage, as well as inaccessibility of data as a result of change in applied technology.

7.2. Processing takes place to reach articulated and legal goals described in present policy to a necessary and proportional degree, based on relevant laws and recommendations, keeping appropriate safety measures.

7.3. In order to achieve these, Controller stores information in encrypted data stocks in separate databases insulated from each other based on processing goals to which certain Controller employees – performing tasks indicated in this notice – have access to, who have to protect data and it is their responsibility to handle this notice and relevant laws in an appropriate manner.

8. Data Subject's rights concerning data processing

8.1. Right to information

8.1.1. By reading this Privacy Notice, the Data Subject gains information about the data processing at any time. At the request of the Data Subject, verbal information may also be provided, assured that the Data Subject's identity has been verified by other means. The Data Subject may request information both during and after data processing. The information covers all essential details of data processing and the way in which the Data Subject's rights can be exercised. At the request of the Data Subject, the Controller also informs the Data Subject about the measures taken on the basis of the Data Subject's requests – or the reason for their failure to do so, indicating the forums available for presenting a complaint.

8.1.2. Providing information is free of charge. If the Data Subject's request is clearly unfounded or excessive, especially because of its repetitive nature, the Controller, taking into account the administrative costs of providing the requested information or communication or taking the action requested, may:
- charge a reasonable fee, or
- refuse to take action on the basis of the request.

8.2. Right of access

8.2.1. The Data Subject has the right to access his or her data processed by the Controller. If requested to do so, the Controller informs the Data Subject whether a data processing is in progress regarding to the Data Subject's personal data and as well about all the relevant circumstances related to the specific data processing.

8.2.2. According to the right of access, the Data Subject may request a copy of his/her personal data (including photo and video recordings) processed by the Controller, which the Controller provides free of charge for the first time. For further copies, the Controller may charge a reasonable fee based on administrative costs.

8.2.3. The copy is provided by the Controller in a commonly used electronic format, unless the Data Subject requests otherwise.

8.2.4. If the Data Subject requests this, the Controller will provide him/her with written information about what data is processed about him/her.

8.2.5. The Controller provides access as soon as possible from the submission of the request (without undue delay), but no later than within one month.

8.3. Right to rectification

8.3.1. The Data Subject has the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning the Data Subject.

8.3.2. Taking into account the purposes of data processing, the Data Subject is entitled to request the completion of incomplete personal data, including by means of providing a supplementary statement.

8.3.3. At the request of the Data Subject, the Controller rectifies or supplements where justified any inaccurate personal data concerning the Data Subject without undue delay.

8.3.4. The Data Subject is already entitled to this right with regard to any other information that may appear in the recordings, such as the date and the descriptions of the recordings, which are conceptually excluded

8.4. Right to erasure

8.4.1. The Data Subject has the right to obtain from the Controller the deletion of personal data concerning him or her without undue delay and the Controller is obliged to delete personal data related to the Data Subject without undue delay if one of the following reasons exist:

a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
b) the Data Subject withdraws consent on which the processing is based and there is no other legal basis for the processing.
c) the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
d) the personal data was unlawfully processed;
e) the personal data must be erased in order to comply with a legal obligation imposed on the Controller by European Union or Member State law.

8.4.2. The Controller is not obliged to delete the data necessary for the presentation, enforcement or protection of legal claims upon request by the Data Subject, nor is the Controller obliged to delete data processed for the protection of the vital interests of the Data Subject or another natural person or to fulfill an obligation under European Union or Member State law to which the Controller is subject. By default, however, after the retention period has expired, the Controller deletes the data without a request.

8.5. Right to restriction of data processing

8.5.1. At the request of the Data Subject, the Controller restricts data processing in case one of the following conditions applies:

a) the Data Subject contests the accuracy of the personal data, in which case the restriction applies to the period that allows the Controller to verify the accuracy of the personal data;
b) the processing is unlawful and the Data Subject opposes the erasure of the data and instead requests the restriction of its use;
c) the Controller no longer needs the personal data for the purpose of data processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims;;
d) the Data Subject has objected to the processing; in this case, the restriction applies to the period until it is established whether the legitimate interests of the Controller override the legitimate interests of the Data Subject.

8.5.2. Where data processing has been restricted, such personal data will, with the exception of storage, only be processed with the consent of the Data Subject or for the presentation, enforcement or defense of legal claims or for the protection of the rights of another natural or legal person or for important public interest of the European Union or a Member State.

8.5.3. The Controller in advance informs the Data Subject - who has contested the accuracy of the personal data and based on this contest the data processing has been restricted - about the lifting of the restriction of data processing.

8.6. Notification obligation related to the rectification or deletion of personal data or restriction of processing

The Controller notifies the Data Subject about the rectification, restriction and deletion as well as all recipients to whom Data Subject's data have previously been transferred. Notification may be omitted if it proves impossible or requires a disproportionate amount of effort. At the request of the Data Subject, the Controller informs him or her about the recipients.

8.7. Right to data portability

8.7.1. The Data Subject has the right to receive the personal data concerning him/her that the Data Subject has provided to the Controller in a structured, commonly used and machine-readable format and has the right to transmit these data to another data controller without hindrance from the Controller to whom the Data Subject has made the personal data available, if:

a) the processing is based on the consent of the Data Subject or on a contract concluded with him/her; and
b) data processing is carried out by automated means.

8.7.2. When exercising the right to data portability as described above, the Data Subject has the right to have the personal data transmitted directly from one Controller to another, where technically feasible.

8.8. Right to object

8.8.1. The Data Subject may object on grounds related to his or her particular situation, at any time to the processing of the Data Subject's personal data that's based on legitimate interest.

8.8.2. In this case, the Controller may further process the personal data only if it demonstrates compelling legitimate grounds for the data processing which override the interests, rights and freedoms of the Data Subject or for the submission, enforcement or defense of legal claims.

8.8.3. The Data Subject can't practice this right in relation to any of the data processings covered by this notice.

9. Fulfilling Data Subject's requests

9.1. During joint data processing, BARE International Hungary Kft. performs the tasks related to informing the interested parties and exercising their rights.

9.2. Controller offers notification and taking actions for free, as described in Point 7. If Data Subject's request is obviously unfounded, or – especially for its repeated nature – exaggerated, Controller

a) might charge a reasonable price, or
b) might deny taking actions based on request, considering data requested, or administrative costs of measures to be taken to fulfil request.

9.3. Controller informs Data Subject without any unreasonable delay, but maximum one month after receiving the request about actions that has been taken, including issuing copies of data. If necessary, considering the complexity of request and numbers of requests this deadline can be made longer with additional two months. Controller informs Data Subject about elongation of deadline together with indicating reasons of delay within one month after receiving the request. If concerned Data Subject sends his/her request electronically, Controller provides information electronically, except when concerned Data Subject asks for it in a different way.

9.4. If Controller does not take any steps as reaction to Data Subject's request, without delay but within maximum of one month after receiving the request, Controller informs Data Subject about reasons why there have been no actions taken, and about the possibility of filing a complaint to the data protection authority competent in his place of residence and can have the right to legal remedy.

9.5. Data Subject can hand in their request to Controller in any way that identifies them. Identifying Data Subjects who hand in a request is necessary because Controller can deal with only those requests that are entitled. If Controller has justified doubts about the identity of natural person handing in a request it can ask for other pieces of information to assure the identity of concerned Data Subject.

9.6. Data Subject can send their requests to Controller to the address **47, Váci Street, 1134 Budapest, Hungary** or to the e-mail address **dataprivacy@bareinternational.com** Controller considers requests sent in e-mail genuine only if it was sent from an e-mail address registered at Controller's database. However, using another e-mail address does not mean in observance of such requests. Time of receiving e-mails is the first day after the e-mail was sent.

10. Prosecution of rights

10.1. The Controllers have appointed BARE International Hungary Kft. as contact in connection with data protection issues related to joint data processing. Data protection issues can be addressed to the Controllers primarily at the following contact details:

BARE International Hungary Kft.
E-mail address: dataprivacy@barienternational.com
Postal address: Annex 1
In addition, the Data Subject can indicate his/her needs and exercise his/her rights in relation to joint data processing to any Controller.

10.2. Data Subject can contact Controllers with any complaints regarding the handling of his/her data, also at the above contact details.

10.3. Those concerned may exercise their legal rights in court, and they can apply to the Data Protection Authority operating in the Member State of their residence within the EU.

Among themselves, the joint Controllers have appointed BARE International Hungary Kft. to handle data protection issues. Data protection authority according to the place of operation of the appointed data controller:

National Authority for Data Protection and Freedom of Information
(Nemzeti Adatvédelmi és Információszabadság Hatóság)
Address: 9-11. Falk Miksa Street, Budapest 1055, Hungary
Postal address: P.O. Box 9 Budapest 1363, Hungary
Telephone: +36 1 391 1400
E-mail: ugyfelszolgalat@naih.hu
Website: http://www.naih.hu/

In case of choosing a process involving a courthouse, the lawsuit – based on concerned Data Subject's choice – can be initiated at the court in concerned person's residence or place of stay.

BARE International