

Privacy Notice

on data processing carried out by the job applications

1. Joint data controllership (BARE International)

1.1. Joint data controllers

BARE International Inc. and subsidiaries (according to [Appendix 2](#))
“Controller” or Controllers” 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 Kft.

Data Protection Officer

Email address: dataprivacy@bareinternational.com

For headquarters and postal address click [HERE](#)

(hereinafter together: **Controller**)

1.3. The Controllers carry out the processing jointly. All Controllers participate in the organization and operation of the processing and jointly determine the rules of the processing.

1.4. During joint data processing, BARE International Hungary Kft. performs the tasks related to the individual information of the Data Subjects 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.

Email address: dataprivacy@bareinternational.com

For headquarters and postal address click [HERE](#)

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. In the course of joint data processing, with regard to data transfers from the territory of the European Union to third countries, the joint 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. The notice applies to the Controller's data processing during the evaluation of job applications.

3.2. Data subjects: natural persons who, on their own initiative or at the request of the Controller, send job application material to the Controller (hereinafter: Data Subject).

3.3. Duration of the notice: the notice is valid from its date until the issuance of a new notice on the same subject.

4. Scope of processed data

4.1. Data processing affects the following data of the Data Subject:

Data provided by the applicant in his or her CV and attachments, typically:

- surname,
- first name,
- address,
- date of birth,
- signature
- indication of the applied position,
- wage demand,
- previous jobs, positions and professional experience,
- acquired educations, qualifications, the documents certifying them and belonging educational establishments
- other educations and qualifications, licences and documents certifying them,
- degree of language proficiency and the document certifying it,
- an introduction and/or motivation letter and its content,
- photograph attached by the applicant,
- information about your public social media profile that is relevant to the job application or for the applied position,
- additional information provided by the applicant.

4.2. Information on reviewing the social profile available on the Internet: During the evaluation process of job applications, the Controller's activity includes reviewing the Data Subject's social media site, which is public to anyone and relevant in connection with the position he or she applied for. However, it does not cover data visible in closed groups or acquaintances or data related to privacy. The profile page is not saved, stored or transmitted.

5. Cases of joint processing

5.1. The Controller is in contact with several recruitment service providers. If the Data Subject comes into contact with the Controller through a recruitment service, then it will be involved in the joint data processing of the Controller and the given intermediary partner (hereinafter: Partner). The Data Subject may obtain information about the identity of the Partner participating in the joint data processing from the Partner, as well as about the details of the data processing performed by the Partner. In the case of joint data processing, the Data Subject first contacts the Partner.

5.2. During the joint data processing the Controller determines its requirements related to applicants, and the Partner contacts potential applicants and makes the application material available for Controller.

5.3. Joint data processing means the processing of the applications in a common database and the forwarding of application materials to the Controller, obtained by the Partner according to the Controller's criteria. In the former case, the details of the data processing are determined by the Partner, the Controller does not build its own database to store the applications in the long term.

5.4. During joint data processing, contact tasks towards the Data Subject are primarily performed by the Partner, until the Data Subject comes into direct contact with the Controller. After that, the Controller is the contact person for the Data Subject with whom the Controller has started direct communication regarding the job application.

5.5. The Data Subject may submit requests related to data processing at any time to any of the joint controllers.

6. Purpose of data processing

The purpose of data processing is to evaluate the submitted job application.

7. Legal basis for data processing

7.1. Article 6 (1) point b) of the GDPR, according to which processing is necessary in order to take steps at the request of the Data Subject prior to entering into a contract.

7.2. The legal basis for viewing the Data Subject's public social profile is Article 6 (1) point (f) of the GDPR, according to which processing is necessary for the purposes of the legitimate interests of the Controller. The Controller has prepared a separate documentation on consideration of interests, which is available to the Data Subject at the Controller.

8. Duration of data processing and storage

8.1. The data and data carriers (documents submitted by the Data Subject) are processed by Controller until the evaluation of the given job application, which takes place within a maximum of 3 months from the date of submission.

- 8.2. After evaluation – regardless of its results – the Controller deletes the data, except:
- the data necessary for the establishment of an employment relationship in case of a positive assessment;
 - or in case the Data Subject gives his or her consent to the re-evaluation of his or her job application (according to the next chapter).

9. Re-evaluation of the job application

9.1. If the job application is rejected, but the Controller sees an opportunity to employ the Data Subject later, then with the consent of the Data Subject the Controller shall store the data and data carriers processed during the evaluation of the job application for the purpose of re-evaluation.

9.2. Scope of processed data: data included in the job application.

9.3. Scope of natural persons affected by data processing: Data Subjects whose job applications were rejected by the Controller at the first evaluation and who consented to the further storage of their data for re-evaluation.

9.4. The purpose of data processing: re-evaluation of the job application.

9.5. Legal basis for data processing: consent of the Data Subject pursuant to Article 6 (1) point (a) of the GDPR.

9.6. Duration of data processing: until re-evaluation, but not later than 31 January of the second calendar year following the year of consent of the Data Subject.

In case of re-evaluation, the data will also be processed until the evaluation, after which – or if the above deadline has passed without re-evaluation – the Controller deletes the data, and the data carriers obtained during the submission of the job application.

10. Where the data is stored

10.1. Job applications received electronically are stored electronically in an electronic storage provided by the Progressors mentioned in chapter 14.

10.2. The electronically received job applications may be printed to be used during the job interview. Printed copies will be stored at the address at 1134 Budapest, Váci út 47., in a lockable office and in a locker within it.

11. Data protection, data security

11.1. The electronically saved data is saved in databases separated by purpose, logged and secured by password, and can only be accessed by those employees who are responsible to evaluate the applications.

11.2. The persons described in point 12 are entitled to access the data stored in the form of paper documents, subject to the rules written therein.

11.3. The Controller stores the data carriers at the place of storage (at the location indicated above), in a lockable office in a locker.

11.4. Only those employees of the Controller can enter the lockable office who perform their tasks based on their job duties in the mentioned office.

11.5. The Controller's offices are protected during the day, during working hours with the personal presence of employees, outside working hours with a door with a security lock and an alarm system. The building has a concierge service and a reception, the inbound and outbound passenger traffic is only possible through them.

12. Persons entitled to access the data and the rules of access

12.1. The Controller can get acquainted with the data:

- managing director,
- HR manager,
- HR employees,
- head of applied field,
- an expert employee of applied field.

12.2. The persons listed here can only access the data for the purpose of evaluating job applications and for the purpose of performing the administrative tasks necessary.

13. Transfer of data

13.1. In connection with the management of job applications, no data will be transferred outside the Controller's organization.

13.2. In case of background check Controller uses an external service provider. If that happens Controller informs Data Subjects about the identity of the external service provider. The external service provider will inform the Data Subjects about the details of the data processing before starting it.

14. Use of Processor

14.1. HR administrative system provider and software developer

14.1.1. Data subjects of data processing: Data Subjects indicated in this notice.

14.1.2. The Controller uses the service provider and software developer of the HR case management system as Processor to record personal data related to job applications:

Bamboo HR LLC

abbreviated name: Bamboo HR LLC

registered office: 335 South 560 West Lindon, UT 84042-1911, USA

mailing address: 335 South 560 West Lindon, UT 84042-1911, USA

connection: privacy@bamboohr.com

website: <https://www.bamboohr.com>

hereinafter: **Processor**.

14.1.3. The purpose of using the Processor: to provide the electronic HR administration system.

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

14.1.5. Nature of data processing: electronically.

14.2. Electronic storage provider and e-mail system software and hosting provider

14.2.1. Data subjects: Data Subjects identified in this notice

14.2.2. The Controller uses the electronic storage provider and e-mail system software and hosting provider as Processor:

Microsoft Ireland Operations Limited

abbreviated name: Microsoft Ireland Ltd.
company registration number: 256796
tax number: IE8256796U
registered office: 70 Sir Rogerson's Quay, Dublin 2, Ireland
Postal address: One Microsoft Place, South County
Business Park, Leopardstown, Dublin 18, Ireland
website: <https://www.microsoft.com>

hereinafter: **Processor**.

- 14.2.3. The purpose of using the processor: to provide the electronic storage necessary to store data electronically and to provide software and hosting for e-mailing.
- 14.2.4. The data processed by the Processor: It is not the purpose of the Data Processor to get to know the data, however, due to the nature of its service, it accesses, stores and backs up the data stored in in the provided electronic storage and the e-mail account.
- 14.2.5. Nature of data processing: the processing of data means the provision of services.
- 14.3. The Controller does not use any other Processors than the Processors indicated above.

15. Ways of informing the Data Subject in advance

- 15.1. If the Data Subject submits his or her application at the request of the Controller, the Controller shall ensure that the Data Subject can familiarize him or herself with the content of this information before submitting the application. (E.g. indicates the availability of the Privacy Notice in the job advertisement.)
- 15.2. If the Data Subject submits his or her application on his or her own initiative, regardless of the request of the Controller, the Controller shall send the Privacy Notice to Data Subject electronically without delay – but no later than within 10 working days – after receiving the application file. If this is not possible, the Controller shall inform the Data Subject where he or she can obtain information about the data processing.
- 15.3. In the case of an application submitted electronically, the Controller shall confirm its receipt electronically, which shall be accompanied by this Privacy Notice.
- 15.4. In case of applying by phone the applicant will be redirected to Controller's online platform to send his or her job application electronically. During the phone call no data is recorded.

16. Rights of the Data Subject related to data processing

16.1. Right to information

16.1.1. By reading this Privacy Notice, the Data Subject gain 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.

16.1.2. 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:

- a) charge a reasonable fee, or
- b) refuse to act on the request:

16.1.3. The Controller shall provide the information as soon as possible (without undue delay), but no later than within one month from the submission of the request.

16.2. Right of access

16.2.1. The Data Subject has the right to access his or her data processed by the Controller. If requested to do so, the Controller shall inform 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.

16.2.2. Pursuant to the right of access, the Data Subject may request a copy of his or her personal data processed by the Controller, which the Controller shall provide free of charge for the first time. For additional copies, the Controller may charge a reasonable fee based on administrative costs.

16.2.3. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided by the Controller in a commonly used electronic form.

16.2.4. Within the shortest possible time (without undue delay), but no later than within one month from the submission of the request, the Controller shall provide access as described above.

16.3. Right to rectification

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

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

16.3.3. At the request of the Data Subject, the Controller shall rectify or supplement where justified any inaccurate personal data concerning the Data Subject without undue delay.

16.4. Right to erasure

16.4.1. 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 are no longer necessary in relation to the purposes for which they were 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 have been unlawfully processed;
- e) the personal data must be deleted in order to fulfill the legal obligation prescribed by the European Union or Member State law to which the Controller is subject.

16.4.2. 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.

16.5. Right to restriction of data processing

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

- a) the accuracy of the personal data is disputed by the Data Subject, in which case the restriction applies to the period enabling the Controller to verify the accuracy of the personal data;
- b) the data processing is unlawful and the Data Subject opposes the deletion of the data and instead requests the restriction of their use;
- c) the Controller no longer needs the personal data for the purposes of the data processing, but they are required by the Data Subject to submit, enforce or defend legal claims;
- d) the Data Subject has objected to the data processing; in this case, the restriction applies to the period until it is determined whether the legitimate interests of the Controller override the legitimate interests of the Data Subject.

16.5.2. Where data processing has been restricted, such personal data shall, 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.

16.5.3. 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.

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

The Controller shall notify the Data Subject and all recipients to whom the data were previously transferred of the rectification, restriction and deletion. Notification may be omitted if it proves impossible or requires a disproportionate effort. At the request of the Data Subject, the Controller shall inform him or her about the recipients.

16.7. Right to data portability

16.7.1. The Data Subject is entitled to receive the personal data related to him or her, which the Data Subject has provided to the Controller, in a structured, widely used and machine-readable format and have the right to transmit those data to another Controller without hindrance from the Controller to which the personal data have been provided, where:

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

16.7.2. Among the data processing covered by this prospectus, this right covers the data necessary for the conclusion of the contract and processed based on consent. This means the data contained in the job application submitted by the Data Subject or provided by him or her during the job interview.

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

16.8. Right to object

16.8.1. 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.

16.8.2. 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.

16.8.3. Among the data processing covered by this Privacy Notice, the Data Subject may object to access the data related to his public social profile, as this is done by the Controller based on the Controller's legitimate interest, based on Article 6 (1) point f) of the GDPR.

17. Compliance with the requests of the data subject

17.1. The Controller shall provide the information and measures referred to in the previous chapter free of charge. If the Data Subject's request is manifestly unfounded or excessive, in particular because of its repetitive character, the Controller, taking into account the administrative costs of providing the requested information or communication or taking the action requested, may:

- (a) charge a reasonable fee, or
- (b) refuse to act on the request

17.2. The Controller shall inform the Data Subject without undue delay, but no later than within one month of receipt of the request, of the measures taken in response to the request, including the issuance of copies of the data. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The Controller informs the Data Subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay. If the Data Subject submitted his or her request electronically, the Controller shall provide the information electronically, unless otherwise requested by the Data Subject.

17.3. If the Controller does not take action on the request of the Data Subject, the Data Subject shall inform him or her about the reasons for not taking action and on the possibility for the Data Subject to lodge a complaint with the supervisory authority indicated in Section 10 and exercise his or her right to judicial remedy as described therein without delay and at the latest within one month of receipt of the request.

17.4. The Data Subject may submit his or her requests to the Controller in any manner enabling identification of his or her person. The identification of the Data Subject submitting the request is necessary because the Controller can only fulfill the requests to those entitled to it. If the Controller has reasonable doubts about the identity of the natural person submitting the request, it may request the provision of additional information necessary to confirm the identity of the Data Subject.

17.5. If the Data Subject wishes to submit his or her request by post, he or she may send it to BARE International Hungary Kft. at 1134 Budapest, Váci út 47., or electronically by e-mail to the dataprivacy@bareinternational.com e-mail address. The Controller shall only consider a request sent by e-mail as authentic if it is sent from the Data Subject's e-mail address provided and registered there, however, the use of the other e-mail address does not mean ignoring the request. In the case of an e-mail, the date of receipt shall be considered to be the first working day after sending

18. Enforcement rights

18.1. The joint 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 joint Data Controllers primarily at the following contact details:

BARE International Hungary Ltd.

E-mail address: dataprivacy@bareinternational.com

For headquarters and postal address click [HERE](#)

In addition, the Data Subject can indicate its needs and exercise its rights in relation to joint data processing to any Controller.

18.2. Data Subject can contact Controllers with any complaints regarding the handling of Data Subject's data, also at the above contact details.

18.3. 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 place of residence within the EU, or the seat or area of operation of the given Controller.

National Authority for Data Protection and Freedom of Information

(National Data Protection and Freedom of Information Authority)

address: 9-11. Falk Miksa Street, Budapest 1055, Hungary

mailing address: PO Box 9 Budapest 1363, Hungary

phone: +36 1 391 1400

fax: +36 1 391 1410

e-mail: ugyfelszolgalat@naih.hu

website: <http://www.naih.hu/>

18.4. 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 the concerned person's residence or place of stay.

18.5. Data Subjects outside EU can exercise their law enforcement possibilities by turning to the Court of Justice or to the data protection authority competent for the main place of Data Subject's residence, or place of the Controller's headquarters or area of operation of Controller.