

DATA MANAGEMENT INFORMATION

Data processing related to recruitment services, recruitment services, own recruitment

The Gamax Ltd. is looking for workers for placement, temporary work, student work, retired work or for its own part. The purpose of this information notice is to inform applicants for jobs advertised by Gamax Ltd. about how personal data of applicants is processed by Gamax Ltd. in the context of applying for a job.

1. DATA CONTROLLER

The data controllers of your personal data relating to recruitment (job application) are the members of the Pannon-Work group of companies, which are:

Pannon-Work Zrt., HUNAM Personnel Solutions Ltd., Pannon-Work School Cooperative, Pannon Student School Cooperative, Work For All Social Cooperative, MELÓ-CLUB Work Organizing Social Cooperative, SegédErő Social Cooperative, Pannon-Work Silver Public Interest Pensioners Cooperative, Gamax Ltd, Pannon-Work Student Workers' Service Ltd., Telekontakt Marketing Ltd., Arrabona-Work Ltd., PARISATIS Hungary Ltd., GamaxMédia Ltd., Humán Labor Quality Ltd. Pannon-Work Future is a cooperative for people with young children at home,

(hereinafter "**Pannon-Work**" or "**we**").

Based on the agreements between the members of the Pannon-Work group of companies, Pannon-Work Zrt. is primarily responsible for providing information concerning this data processing and for exercising the rights set out in point 6 of this information, and for responding to enquiries. In the case of student work, you can send your enquiries to the Pannon-Work School Cooperative, and in the case of pensioner work to the Pannon-Work Silver Public Interest Pensioner Cooperative, using the contact details below.

How to contact us for questions about data management:

postal mailing address: 1114 Budapest, Bartók Béla út 15/D. II.18.

e-mail inbox: adatvedelem@gamax.hu

telephone: +36-1-372-0692

web: www.gamax.hu

Data Protection Officer: dr. Homonnay Géza

postal address: 1114 Budapest, Bartók Béla út 15/D. II.18.

e-mail account: adatvedelem@gamax.hu

phone: +36-1-372-0692

2. PROCESSING OF PERSONAL DATA OF APPLICANTS IN THE CONTEXT OF MEDIATION, RECRUITMENT, OWN RECRUITMENT

The Pannon-Work group of companies processes the personal data of job applicants in the context of its recruitment services. In addition, the advertised jobs may also include jobs offered by a member of the Pannon-Work Group, i.e. job advertisements that we use to recruit employees for ourselves.

When you apply for one of our jobs, you can choose to consent to Pannon-Work processing your personal data only in relation to the job you are applying for, or you can also consent to us storing your CV and other personal data you provide during the application process in our job database. The advantage of the jobseeker database is that we can take your CV into account for other job opportunities and contact you with further job offers.

Below is a table summarising what data we process, for what purposes and on what legal basis and for how long.

	FOR A SPECIFIC JOB ADVERTISEMENT APPLY	APPLY BY ADVERTISEMENT (Flying CVs)	JOBSEEKER DATABASE
Purpose of data processing	Managing the selection of candidates for the vacancy and preparing the selection.	If someone does not apply for an advertised job, but simply enquires whether we currently have a job that matches their requirements, the purpose of the processing is to respond to that enquiry.	Offering the people in the database a suitable job opportunity .
Legal basis for processing	Your voluntary consent (Article 6(1)(a) GDPR) In the absence of consent, the candidate cannot participate in the selection.		
Form of consent	Sending your CV, cover letter, personal data, providing or making available additional personal data during the application process by email, telephone, in person or otherwise.	By making a separate declaration of consent.	
Scope of personal data processed	<ul style="list-style-type: none"> - <u>Minimum information required when applying:</u> • the applicant's first and last name and telephone number (for identification and contact purposes); • the CV submitted by the candidate, all the data and information contained therein: including photo, age, work history, interests, etc. (All these data help Pannon-Work to select the right person for the job and to offer the candidate the right job opportunity); • the name of the applicant's current employer (By agreement with some of our 		

	<p>partners, we are not allowed to contact or refer our own employees during the period of cooperation with them or during the individually defined period thereafter. In order to comply with this contractual obligation, we process the personal data of applicants about their current employment. If applicants do not consent to us processing their employment details, we will not be able to provide them with a placement service.)</p> <ul style="list-style-type: none"> • the candidate's education, training and previous work experience (to assess compliance with job requirements); • information on reduced capacity for work, if required by the job (e.g. standing work, physical work) <p>- <u>The following data may also be processed:</u></p> <ul style="list-style-type: none"> • e-mail address (for contact purposes) • jobs of interest (to be recommended for the right project) • date of birth (if required for the job (e.g. physical work, or to pre-screen for age for leasers' needs for the job) • additional personal data provided by the candidate during the selection process: e.g. salary requirements, night shift, long-distance mobility, etc. (to offer you a suitable job opportunity only) • a record of the hearing (if any); • a certificate of good character (if it is justified); • if either Pannon-Work or the future employer asks you to take a work aptitude test (language test, reading comprehension test, monotony tolerance test, etc.), the result of the aptitude test, the conclusion that can be drawn from it. 		
<p>Duration of data processing</p>	<p>We will delete personal data processed for the purposes set out in this notice at any time at the applicant's request.</p> <p>Candidates should note that if they request the deletion of their data before the selection is closed, they will no longer be able to participate in the selection process, as we will not have their application file for the evaluation.</p>		
	<p>We will also delete personal data in the absence of a request for erasure in the following cases:</p>		
	<p>We will delete the personal data processed in relation to the job advertisement 3 months after the selection is closed, unless we may continue to process your personal data for other purposes as set out in this notice.</p> <p>In case of a permanent vacancy, we will delete the applications received and</p>	<p>30 days after it has been established that there are no vacancies corresponding to the vacancy and the person concerned has been informed and has not requested to be included in our jobseeker database.</p>	<p>After 2 years from the date of your subscription to the database.</p>

	the personal data processed in connection with them after 1 year from the date of application. If the position is closed before that date, the above (closure + 3 months) retention period will apply.		
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3. **LINKEDIN**

Our colleagues also use LinkedIn to find potential candidates, in compliance with LinkedIn's terms of use.

If our colleagues think you might be a good candidate for a particular position, they will contact you via LinkedIn. The message will let you know who we are and what we would like to contact you about.

We will process your personal data posted on LinkedIn on the LinkedIn platform and will not delete it from there, unless you explicitly consent. You can also provide your personal data to us by applying for a specific job through our tomorrow or by registering in our CV database.

Our legal basis for processing data in connection with contacting you on LinkedIn and maintaining your LinkedIn connection is our legitimate interest (Article 6(1)(f) GDPR) to inform potential candidates about current job opportunities that are relevant to them.

LinkedIn is a professional community forum. A LinkedIn profile is actually a person's professional CV. Given that it is a popular and well-known forum primarily for professional awareness and career building, LinkedIn members are aware of the fact that recruiters can also contact them with offers through LinkedIn. In LinkedIn's terms of use and privacy policy, LinkedIn draws users' attention to the fact that their personal data may be disclosed to third parties, in particular recruitment agencies, and that they may be contacted with job offers.

In addition, LinkedIn's settings give users a wide range of options to set the content and visibility of their profile, so that they can choose what is publicly available and what is visible to their confirmed partners.

4. **PROFESSION**

We are entitled to view and download CVs uploaded to the Profession CV database in accordance with the Profession Terms of Use and to process the personal data contained therein for 90 days from the date of download. If the person concerned has not consented to our processing of his/her CV for more than 90 days, either by applying for one of our job vacancies or by registering in our own CV database, we will no longer process the CV downloaded from the Profession site after 90 days.

5. FACEBOOK JOBS

We also publish job ads on our Facebook job ads service. Facebook and Pannon-Work are the joint data controllers of the Facebook job ad application process.

After clicking the apply button in the job advertisement, you can enter your personal details on the form that appears. The form is automatically filled in by Facebook, but you can change the information you enter. You can send us the finalised form by clicking on the apply button. Your application will be considered for selection once you have finalised your application. In order to finalise your application, you will be asked to consent, via the link sent to you by e-mail, to the processing of your personal data for the purposes of selection in accordance with point 2 of this notice.

The personal data we process in connection with this form:

name, phone number, e-mail address, city, experience, studies, job applied for, date of application, reply to accept the privacy notice

The purpose of processing the data is to receive your application and to contact you in order to finalise your application.

If you do not finalise your application within 3 days of sending the form, your application will be deleted.

The legal basis for the processing is our legitimate interest (Article 6(1)(f) GDPR) to collect potential applicants, to receive applications, to contact interested applicants for final applications. Processing based on this legitimate interest does not infringe your rights to your personal data, as you knowingly fill in and send us the form in order to apply for the advertised job, and we process your data for this purpose. You are also informed that Facebook will forward the form to us.

6. FACEBOOK POSTS AND COMMENTS

On the Pannon-Work Facebook pages, we post some of our current job advertisements. You can apply for the posted job advertisements by filling in the application form available at the link published in the advertisement. We cannot accept applications in comments as applications, and please do not post any personal information (e.g. phone number, education, etc.) in comments.

7. ADDITIONAL PROCESSING RELATED TO THE PERFORMANCE OF A BROKERAGE CONTRACT

7.1. Pre-screening (name-check)

For some of our partners, we need to pre-screen candidates to check whether they are already in our database, for example because they have been recommended to us by another recruitment agency or have worked for a partner or a company in their group. If the candidate is already in the database of the partner, it is not in our interest to initiate the placement or loan of the candidate. In view of this, Pannon-Work may typically provide the potential employer/leaser with the candidate's name and email address for pre-screening purposes, and occasionally, if additional information is required for identification purposes, the candidate's mother's name and birth details.

We process and transfer personal data sent for pre-screening to our client on the basis of our legitimate business interest (Article 6 (1) (f) GDPR). If we will not be entitled to a commission fee on the basis of the placement or lending of the person concerned, it is not in our interest to continue the placement or lending of the person concerned to the client.

We give the applicants concerned the opportunity to tell us in advance which employers they do not wish to be contacted, so that we do not send their personal data to employers they do not wish to be pre-screened.

The result of the pre-screening will be deleted if the feedback is negative, i.e. if the person cannot be contacted, after the feedback. In the case of positive feedback, i.e. if the person is not in the client's database, the result of the pre-screening will be retained for the limitation period (5 years) of our legitimate interest in pursuing our claim for our commission from the mediation.

7.2. Accounting of the commission fee

In order for Pannon-Work and the employer commissioning it to be able to settle the fee for the mediation service, Pannon-Work must be able to prove which person and when it mediated for the partner and that the partner informed Pannon-Work whether or not it will employ the mediated employee. In the case of the employment of an intermediary by a principal, it is also relevant to know when and under what legal relationship the employment takes place. And if our engagement fee is based on a percentage of the intermediary's base salary, we must also know the amount of the intermediary's contractual base salary for the purposes of accounting for the engagement fee.

The personal data processed for this purpose are therefore the fact and date of the mediation and the employment by the principal, the refusal of employment and, in the case of a percentage mediation fee, the amount of the contractual basic salary of the person successfully mediated.

The legal basis for the processing is our legitimate interest in the enforcement of the mandate fee (Article 6(1)(f) GDPR). We consider that our processing based on legitimate interest is proportionate to the restriction of the data subject's rights to his or her personal data, without which we would not be able to enforce our mandate fee. And the data subject is aware that he or she will be in contact with the employer concerned in the context of a recruitment agency. By using our services, you therefore acknowledge that your personal data will be processed as necessary for purposes strictly related to the service.

If our client does not employ the mediated person during the period specified in the contract (fee period), the personal data supporting the fact of mediation will no longer be processed under this clause after the expiry of the limitation period for our claim for the mediation fee (5 years after the end of the fee period).

In the case of a successful mediation, proof of this fact is also necessary for tax purposes, so personal data evidencing a successful mediation will be deleted after the expiry of the tax statute of limitations.

7.3. Processing for the purpose of the performance of the brokerage guarantee

Pannon-Work can guarantee to its partner that the person it has recruited meets the search criteria specified by the partner. This guarantee, its duration and its conditions are subject to the agency contract concluded with the partner concerned and may therefore vary from case to case. Under the

guarantee, if the employment of a person placed by Pannon-Work is terminated during the guarantee period for reasons covered by the guarantee, Pannon-Work undertakes to place another candidate for the partner.

In case Pannon-Work provides a guarantee as described above, we will have to process the application files of the applicants covered by the guarantee and their personal data as defined below for the purposes of the assessment of the guarantee claim during the period of the guarantee and the limitation period for the guarantee claims.

For the purpose of assessing the guarantee obligation, Pannon-Work will handle:

- the application file of the mediated candidate (to check whether the candidate met the selection criteria set by the partner),
- the fact and date of the employment with the partner (for the purpose of calculating the duration of the guarantee),
- the employment conditions of the intermediary worker relevant to the assessment of the guarantee claim (job held, compliance with the terms and conditions of employment set by the partner),
- the method, reason and date of termination of employment (to check the conditions of the guarantee).

The processing of the above personal data is based on our legitimate interest in the enforcement of the guarantee and the legitimate interest of our partner enforcing the guarantee (legal basis under Article 6(1)(f) GDPR). The enforcement and enforcement of the guarantee is not possible without the processing of the above personal data, and we therefore consider the processing of your above personal data to be proportionate to our interests.

7.4. Enforcement of a retransmission penalty against a principal

If the brokerage contract contains a provision to this effect and our client subcontracts the person we have brokered to a third party without our permission, our client will be liable to pay us a penalty. For the purpose of enforcing the penalty, we will process the data necessary to identify the person mediated, evidence relating to the mediation (e.g. e-mails evidencing the mediation), evidence of the client's breach of obligations. We will delete these personal data after the expiry of the 5-year limitation period for our claim for damages.

The legal basis for our processing is our legitimate interest in enforcing the penalty (Article 6(1)(f) GDPR). The processing of the above personal data for the purpose of enforcing the penalty is strictly necessary and in our business interests. The enforcement of the claim cannot take place without the processing of personal data. Furthermore, we believe that the processing of personal data for this purpose does not involve any disadvantage for the data subject and therefore the processing is, in our view, proportionate to the restriction of the data subject's right to control the personal data.

8. WHO CAN ACCESS YOUR PERSONAL DATA?

Pannon-Work employees

The applications and the personal data contained therein are accessible to the employees of our companies whose job duties include the administration of recruitment.

Prospective employers or leasers

We will inform you of the identity of the prospective employer/leaser before any of your personal data is disclosed, so that you can decide whether you wish to apply for the job and avoid being contacted by a company where you are already employed or by a company you do not want to be associated with. If you consent to the transfer or if you have already applied for the job with the knowledge of the employer/leaser, we may pass on your CV or, in the absence of a CV, the following application details to the potential employer/leaser for the purpose **of shortlisting** candidates:

- names of applicants,
- details of your education, training and previous work experience,
- information on disability (if required for the job),
- date of birth (if required for the job),
- salary requirements, interview note, CV, Pannon-Work assessment.

Cooperating partners

When selecting our own employees, we may occasionally carry out personality and competency tests and assessments. The tests and surveys are carried out by our cooperation partner and we are informed of the evaluation based on the test or survey. Our current partner is SHL Hungary Kft. (2040, Budaörs, Kossuth Lajos utca 20.).

Our data processors

We may use data processors to store data and to provide IT services related to data media and other data processing operations. The data processors shall act in accordance with the law and Pannon-Work's instructions when carrying out the data processing operations. The data processors we use and their tasks:

DATA PROCESSOR	ACTIVITIES
name: LEADGEN ONLINE Ltd. seat: 8380 Hévíz, Nagy Imre utca 10. 1. floor. 4.	Activity: recruitment in the context of landing page operation, management of application forms filled in there
name: Nexum Hungary Ltd. head office: 6726 Szeged Temesvári körút 15.	Activity: database management software NEXUM, hosting

9. ADATABILITY

In order to maintain the security and confidentiality of the personal data we process and to prevent the destruction, unauthorised use or alteration of personal data, we apply the following IT and other data security and organisational measures in particular. In addition, we keep abreast at all times of technical developments, available technical, technological and organisational solutions and apply solutions appropriate to the level of protection required by our data processing.

Personal data relating to recruitment are processed *both on paper and electronically*.

- Documents containing personal data kept on *paper* are stored in a lockable cabinet to protect them from unauthorised access.
- Personal data provided by *e-mail* or other electronic means may only be accessed and processed by our employees who are authorised to access such data. We ensure through backups that the authenticity and integrity of the data are preserved and that the original data can be restored in the event of destruction or alteration.

10. **YOUR RIGHTS**

- 1./ Withdrawal of consent
- 2./ Right to information / Right of access
- 3./ Right to data portability
- 4./ Right to erasure ("right to be forgotten")
- 5./ Right to object to processing based on legitimate interest
- 6./ Right to restriction of processing
- 7./ Data portability

Withdrawing consent You have the right to withdraw your consent at any time, without giving any reason. After the withdrawal of consent, the personal data of the data subject will no longer be processed. Withdrawal of consent does not affect the lawfulness of the prior processing.

Request information / Right of access You can request information at any time about whether we are processing your personal data. You have the right to request clear, transparent and comprehensible information about how we process your personal data and what your rights are in relation to this. This privacy notice is also intended to do so. Upon request, we will provide you with information about the data we process about you, the purposes, legal basis and duration of the processing, who is or has been given your data and for what purposes, and what data subjects' rights you have if your data has not been given to us by you, and the source of the data. We will also provide you with a copy of the personal data that we hold about you on request together with the information. The first copy will be free of charge, but we may charge a reasonable fee for each additional copy. The amount of this charge will be notified to you in advance.

Right to rectify or amend your personal data If you become aware that any of your personal data is incorrect, inaccurate or incomplete, or if your personal data has changed in the meantime (e.g. you have changed your name, acquired a new qualification), please provide us with the correct, amended or additional data so that we can make the correction or amendment and ensure that the data is up to date.

Right to erasure of your personal data ("right to be forgotten") You can notify us at any time, without giving any reason, that you are no longer interested in the job opportunity or that you no longer wish to be contacted with job offers (withdrawal of consent). We will then delete your personal data, unless there is another legal basis. Withdrawal of consent does not affect the lawfulness of the processing that preceded it. Please note that we may refuse to delete your data, in particular if the

data are or may be necessary for the fulfilment of our legal obligations or for the exercise of our claims.

Objection With regard to processing based on legitimate interests, you may object to our processing if you consider that the processing is prejudicial to you. In the event of an objection, personal data will be deleted unless the processing is justified by compelling legitimate grounds which override your interests, rights and freedoms or is related to the establishment, exercise or defence of legal claims.

Restriction of processing You may request that we designate your personal data for the purpose of restricting its future processing if one of the following conditions is met: (a) you contest the accuracy of the personal data, in which case the restriction will be for a period of time that allows us to verify the accuracy of the personal data; (b) the processing is unlawful and you object to the erasure of the data and instead request the restriction of their use; (c) we no longer need the personal data for the purposes for which they were originally processed but you require them for the establishment, exercise or defence of legal claims; (d) you have objected to the processing and need time to verify whether there are other grounds for the erasure.

During the period of restriction, we will only store the data and will not perform any other processing operations on it, unless you consent to further processing or unless such further processing is necessary to protect your rights, the rights of a third party or is in the public interest. In the event of a restriction of processing, you will be informed in advance of its lifting

Right to data portability If we process your personal data electronically, you may request that we provide the personal data we have about you to you or to another person you designate in a commonly known and easily usable electronic format.

11. HOW TO ENFORCE RIGHTS

CONTACTING Gamax Ltd.

If you wish to exercise any of the above rights, please submit your request in writing to any of our branch offices or send it to us by e-mail to adatvedelem@gamax.hu or by post to Gamax Ltd. 1114 Budapest, Bartók Béla út 15/d. II/18. In the letter, please include your personal identification details and postal address. If we have any doubts about your identity or if the information provided is not sufficient to identify you, we are entitled to ask you for additional identification data.

Your request will be fulfilled within 1 month. If necessary, we are entitled to extend this period by a further two months and will send you a reasoned decision.

Valid requests will be granted free of charge. However, if the request is manifestly unfounded or excessive, in particular because of its repetitive nature, we are entitled to charge a reasonable fee or even refuse to act on the request.

We will inform all those to whom we have disclosed the data concerned of the rectification, erasure or restriction of the data, unless this proves impossible or involves a disproportionate effort. At your request, we will inform you of the recipients to whom we have communicated or informed as described above.

Please note that you can also contact the Data Protection Officer, in the case of the Pannon-Work group of companies, Beáta Torma at adatvedelem@pannonwork.hu

GO TO COURT

You are also entitled to pursue your claim in court. Certain courts have jurisdiction to hear the case. You can bring your claim before the court where we are based or before the court where you live or reside.

CONTACTING THE DATA PROTECTION AUTHORITY, MAKING A COMPLAINT

In the event of unlawful data processing, you are also entitled to turn to the National Authority for Data Protection and Freedom of Information (NAIH) and initiate its proceedings.

Website: <http://naih.hu>

address: 1055 Budapest, Falk Miksa utca 9-11.

postal address: 1363 Budapest, Pf.: 9.

Budapest, 2024. 02. 05.

Members of the Pannon-Work Group
common controllers