

Thank you for inquiring about the RINGHEL company! Please, read our recruitment data protection notice the purpose of which is to ensure that your data is managed in accordance with the General Data Protection Regulation¹ and of Act CXII of 2011 on the freedom of information.

With regards to our recruitment data protection notice processing below we expressly inform you that you have the right to object to processing of your data (see Section 1.6, Subsection E).

We inform you that with regards to your job application our company as data controller processes your personal data provided in the course of your registration and application or generated as the result of the application procedure (personal identification data, contact details, professional CV data, letter of motivation and personal data generated as the result of the individual testing procedures). If you do not directly apply to us (that is, for example through a recruitment agency or through a temporary employment agency or a student labour association) then we inform you that certain personal data of yours is collected in part from you and in part from other sources.

Please, only provide your own, actual data in the course of the selection procedure! Please, do not provide special data (that is, data concerning racial or ethnic origin, political views, religious or philosophical beliefs, trade union membership, genetic data, data concerning health or data concerning your sexual life or sexual orientation) in your application materials to be uploaded!

We will automatically delete your data after one year from the closure of the application procedure, except if, as the result of the evaluation, we establish employment relationship with you. In the case of establishing employment, we will manage your personal data for other purposes and possibly on other legal bases about which, if applicable, we shall provide for you new privacy notice on our other data processing.

RECRUITMENT DATA PROTECTION NOTICE OF RINGHEL TEAM

1.1 Data controller and their contact options

During the recruitment process depending on the chosen vacant position that RINGHEL company is considered to be the data controller that RINGHEL company has been marked in the position on our website.

Based on the above the data controller is the RINGHEL one of its subsidiary depends on the chosen vacant position

1.2 Scope of processed data, purpose, legal basis of data processing, the period for which the personal data is stored²

	Categories of personal data concerned	Purpose of data processing	Legal basis of data processing	Period for which the personal data is stored
a	Personal and contact data of the applicant provided in the course of registration	Identification, keeping contact	The legitimate interest of the Data Controller in selecting the most suitable candidate in order to ensure its safe, operational and prudent operation. Consent (only concerning the storage of data following the selection procedure)	Period of conducting the selection procedure; an additional period of 12 months afterwards if the applicant consented to it
b	Data concerning proficiency, qualification, professional experience	Certifying the qualification necessary to fulfil	The legitimate interest of the Data Controller in selecting the most suitable candidate in	Period of conducting the selection procedure; an additional period of 12 months afterwards if

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council

		the position in question	order to ensure its safe, operational and prudent operation. Consent (only concerning the storage of data following the selection procedure)	the applicant consented to it
c	Professional CV, letter of motivation	Assessing the proficiency, qualification, professional experience necessary to fulfil the position in question and evaluating the motivation of the applicant	The legitimate interest of the Data Controller in selecting the most suitable candidate in order to ensure its safe, operational and prudent operation. Consent (only concerning the storage of data following the selection procedure)	Period of conducting the selection procedure; an additional period of 12 months afterwards if the applicant consented to it
d	Data generated by the Data Controller about the applicant in the course of the interviews concerning the evaluation of the candidates	Evaluation of the suitability of the applicant in the selection procedure	The legitimate interest of the Data Controller in selecting the most suitable candidate in order to ensure its safe, operational and prudent operation. Consent (only concerning the storage of data following the selection procedure)	Period of conducting the selection procedure; an additional period of 12 months afterwards if the applicant consented to it
e	Personal data generated in the course of the aptitude tests, Assessment Centre and other tasks testing skills necessary to fulfil the position before admission (numerical, verbal and logical test ad accuracy test, depending on the nature of the position to be applied for) or as he result of it, with reference to the attitude, skills of the applicant (but do not contain special category of personal data).	Determining suitability for the position	The legitimate interest of the Data Controller in selecting the most suitable candidate in order to ensure its safe, operational and prudent operation. Consent (only concerning the storage of data following the selection procedure)	Period of conducting the selection procedure; an additional period of 12 months afterwards if the applicant consented to it

Concerning the above instances of data processing the Data Controller highlights that if the applicant does not provide the above data in full then exclusion from the selection procedure may be a possible consequence of failing to provide information.

- 1.3** Recipients or categories of recipients of the personal data The Data Controller transmits the personal data submitted or generated in the course of the application procedure to the following members of the Ringhel Team operating in Romania in accordance with Article 45 of the GDPR, based on the adequacy decision of the European Commission 2000/518/EC. The adequacy decision is available under the following link: <https://op.europa.eu/en/publication-detail/-/publication/ee76f93d-4545-4878-87cb-7750d7f59987/language-en>

Name of the recipient	Name of the recipient	Activity concerned by the involvement of the recipient
RINGHEL Team	Independent data controller	The recipient is entitled to get to know and process the data of the applicant in the course of the evaluation of the application and is further entitled to conduct personal interviews with the applicant
Ringhel Team or its subsidiary specified in the job advertisement as the company offering the open position to the candidate	Independent data controller	The data processing carried out by the recipient includes taking part in the evaluation of the applicant and conducting personal interviews with the applicant.

The Data Controller commissioned the following partners with conducting the testing procedure:

Name of addressee	Category of addressee	Activity concerned by the involvement of the addressee
Access Assessment Kft.	Independent data controller/data processor	The recipient provides for the applicant the access to the Assessment Centre in which the aptitude test and other tasks testing the skills necessary to fulfil the position are available, which tests to be completed by the applicant electronically. The task of the addressee is to evaluate the test.

The Data Controller may apply the pre-admission aptitude test and other tasks testing the skills necessary to fulfil the position in the course of every recruitment procedure, depending on the tasks of the position.

In the course of the testing procedure the data controller providing the online test sends the registration data necessary to access the test to the e-mail address provided by the applicant. The applicant is entitled to complete the test and to perform the tested tasks until the date agreed on with the Data Controller. The applicant is the first one entitled to get to know the results of the aptitude test then the Data Controller also becomes entitled to directly get to know the results of the aptitude test.

1.4 Processing of special categories of personal data

The Data Controller does not process any special category of personal data in the course of the selection (recruitment) process.

1.5 Data of the data subject obtained from other sources

Personal data, conclusions referring to the attitude, skills, personality traits of the applicant and generated as the result of the testing procedure are received by the Data Controller from, Access Assessment Kft.

If the applicant does not directly apply for a position at the Data Controller (that is, for example through a recruitment agency or through a temporary employment agency or a student labour association) then the Data Controller may collect certain data from these sources as well.

Category of data source:	Categories of personal data concerned
recruitment agency	scope of data according to Section 1.2, Subsections a) to d)
student labour association or temporary work agency	scope of data according to Section 1.2, Subsections a) to d)

1.6 Rights of the data subject

The Applicant may request from the Data Controller access to personal data concerning the Applicant, rectification of inaccurate personal data, erasure of personal data, in certain cases the restriction of processing, furthermore the Applicant also has the right to object to the processing of personal data. Additionally, the applicant is entitled to the right to the portability of data, to lodge a complaint with a

supervisory authority and to an effective judicial remedy; additionally, in the case of automated individual decision-making (including profiling) the right to obtain human intervention on the part of the Controller and to express his/her point of view and to contest the decision. *In the case of data processing based on consent the applicant is also entitled to withdraw his/her consent at any time, which, however, does not affect the lawfulness of data processing performed based on consent before the withdrawal.*

▪ **Right to access**

The applicant is entitled to request information at any time about whether and how the Data Controller processes their personal data, including the purposes of data processing, the recipients to whom the data was disclosed or the source where the Data Controller received the data from, the envisaged period for which the personal data will be stored, any right of the applicant concerning data processing, information concerning automated decision making, profiling, and information concerning related guarantees in the case of forwarding to third countries or to any international organization. When exercising the right to access the applicant is also entitled to request copies of the personal data undergoing processing; in the case of a request submitted electronically the Data Controller – in lieu of a request from the applicant that says otherwise – provides the requested information electronically (in pdf format). If the right to access of the applicant has a detrimental effect on the rights and liberties, in this regard especially the business secrets or intellectual property of others, the Data Controller is entitled to refuse to comply with the request to the necessary and proportionate extent. If the applicant requests the above information in several copies, the Data Controller charges a reasonable amount of fee, proportionate to the administrative costs of preparing the additional copies.

▪ **Right to rectification**

At the request of the applicant the Data Controller corrects or completes personal data concerning the applicant. If any doubts arise concerning the corrected data, the Data Controller may request from the applicant the certification of the corrected data for the Data Controller appropriately, primarily with documents. If the Data Controller disclosed the personal data of the applicant with this right to another person (e.g. the addressee as data processor), then the Data Controller shall immediately inform such persons after correcting the data, provided it is not impossible or it does not require a disproportionate amount of effort from the Data Controller. At the request of the applicant the Data Controller informs them about such addressees.

▪ **Right to erasure (“right to be forgotten”)**

If the applicant requests the erasure of any or all personal data of theirs, the Data Controller shall erase such data without undue delay if:

- the Data Controller does not need the personal data in question any more for the purpose such data was collected or otherwise processed for;
- it concerns data processing that was based on the consent of the applicant, but the applicant withdrew the consent and the data processing has no other legal basis;
- it concerns data processing that was based on the legitimate interests of the Data Controller or third parties but the applicant objected to the data processing and – with the exception of objection to data processing for direct marketing purposes – there are no legitimate grounds for the data processing that would have priority;
- the Data Controller illegally processed the personal data, or
- the deletion of personal data is necessary for the performance of legal obligations.
- If the personal data under this right is disclosed by the Data Controller to another party (e.g. the recipient as for example data processor) then the Data Controller shall immediately inform such persons after the deletion, provided it is not impossible or it does not require a disproportionate amount of effort from the Data Controller. At the request of the applicant the Data Controller informs them about such recipients. The Data Controller is not always obliged to delete personal data, especially for example in the case of the data processing is necessary for the establishment, exercise or defence of legal claims.

- ***Right to restriction of data processing***

The applicant can request the restriction of the processing of their personal data in the following cases:

- the applicant contests the accuracy of the personal data – in this case the restriction concerns the period enabling the data controller to check the accuracy of personal data;
- the data processing is unlawful but the applicant opposes the erasure of data, requesting the restriction of the usage of the same instead;
- the data controller does not need the personal data for data processing purposes any longer but the applicant needs the data for the establishment, exercise or defence of legal claims; or
- the applicant objected to the data processing – in this case the restriction concerns the period until it is established whether the legitimate grounds of the Data Controller override those of the applicant.

The restriction of data processing means that the Data Controller does not process the personal data belonging under the scope of the restriction except for storage, or only processing such data to the extent the applicant consented to, and the Data Controller may process data necessary for the establishment, exercise or defence of legal claims or for the protection of the rights of other natural persons or legal entities or considering the important public interests of the European Union or any European Union member state even in lieu of such a consent. The Data Controller informs the applicant beforehand about releasing the limitation of the data processing. If personal data under this right is disclosed to other persons (e.g. the addressee as for example data processor), the Data Controller shall immediately inform such persons about the restriction of data processing, provided it is not impossible or it does not require a disproportionate amount of effort from the Data Controller. At the request of the applicant the Data Controller informs them about such recipients.

- ***Right to objection***

If the legal basis for the data processing concerning the applicant is the legitimate interest of the Data Controller or third parties, the applicant is entitled to object to the data processing. The Data Controller is not obliged to uphold the objection if the Data Controller can prove that

- the data processing is justified by legitimate and compelling causes that take precedence over the interests, rights and liberties of the applicant, or
- the data processing is connected to the data for the submission, enforcement or defence of legal claims of the Data Controller.

- ***Right to the data portability***

The applicant is entitled to request that the Data Controller hands over the personal data of the applicant provided to the Data Controller on the basis of consent or a contract, and processed by the Data Controller by automated means (e.g. by a computer system), to the applicant in a structured, commonly used and machine-readable format even for the purposes of transmitting such personal data to other data controllers or if it is technically feasible, the Data Controller, at the request of the applicant, transmits such personal data directly to another data controller as indicated by the applicant. In the case of such requests the Data Controller provides the requested data in an agreed format. If the applicant's exercise of the right to data portability had adversely affected the rights and freedoms of others, the Data Controller is entitled to refuse to comply with the request of the applicant to the necessary extent. Measures taken in the scope of the data portability do not mean the deletion of the data, only if, at the same time, the applicant submits a request to delete the personal data as well. Therefore, in lieu of such a request, the Data Controller stores such personal data as long as it has the purpose and the appropriate legal basis for the processing of those data.

- ***Right to lodge a complaint, right to an effective judicial remedy***

If the applicant considers that the processing of their personal data by the Data Controller infringes the provisions of the established data protection legal regulations, especially the General Data Protection Regulation, the applicant has the right to lodge a complaint with the competent data protection supervisory authority in the Member State of his/her habitual residence, place of work or the place of the alleged infringement.

Please see a list of the authorities in the 1. Annex.

The applicant, regardless of his/her right to lodge a complaint, may also bring proceedings before a court for such infringement. The applicant is entitled to bring proceedings against the legally binding decision of the supervisory authority concerning the applicant as well. The applicant is also entitled to effective judicial remedy

if the supervisory authority does not handle the complaint or does not inform the applicant within three months on the progress or outcome of the complaint lodged.

1.7 AUTOMATED DECISION MAKING, PROFILING

No automated individual decision-making or profiling is performed in the course of the data processing of the Data Controller concerning the applicants.

1. Annex

List of the authorities in the EU countries:

National Data Protection Authorities

<p>Austria Österreichische Datenschutzbehörde Wickenburggasse 8 1080 Wien Tel. +43 1 52152-0 e-mail: dsb@dsb.gv.at Website: http://www.dsb.gv.at/</p>	<p>Belgium Commission de la protection de la vie privée Rue de la Presse 35 / Drukpersstraat 35 1000 Bruxelles / 1000 Brussel Tel. +32 2 274 48 00 Fax +32 2 274 48 35 e-mail: commission@privacycommission.be Website: http://www.privacycommission.be/</p>
<p>Croatia Croatian Personal Data Protection Agency Martićeva 14 10000 Zagreb Tel. +385 1 4609 000 Fax +385 1 4609 099 e-mail: azop@azop.hr or info@azop.hr Website: http://www.azop.hr/</p>	<p>Bulgaria Commission for Personal Data Protection 2, Prof. Tsvetan Lazarov blvd. Sofia 1592 Tel. +359 2 915 3580 Fax +359 2 915 3525 e-mail: kzld@cpdp.bg Website: http://www.cdpd.bg/</p>
<p>Cyprus Commissioner for Personal Data Protection 1 Iasonos Street, 1082 Nicosia P.O. Box 23378, CY-1682 Nicosia Tel. +357 22 818 456 Fax +357 22 304 565 e-mail: commissioner@dataprotection.gov.cy Website: http://www.dataprotection.gov.cy/</p>	<p>Czech Republic The Office for Personal Data Protection Urad pro ochranu osobnich udaju Pplk. Sochora 27 170 00 Prague 7 Tel. +420 234 665 111 Fax +420 234 665 444 e-mail: posta@uouu.cz Website: http://www.uouu.cz/</p>
<p>Denmark Datatilsynet Borgergade 28, 5 1300 Copenhagen K Tel. +45 33 1932 00 Fax +45 33 19 32 18 e-mail: dt@datatilsynet.dk Website: http://www.datatilsynet.dk/</p>	<p>Estonia Estonian Data Protection Inspectorate Väike-Ameerika 19 10129 Tallinn Tel. +372 6274 135 Fax +372 6274 137 e-mail: info@aki.ee Website: http://www.aki.ee/en</p>
<p>Finland Office of the Data Protection Ombudsman P.O. Box 315 FIN-00181 Helsinki Tel. +358 10 3666 700 Fax +358 10 3666 735 e-mail: tietosuoja@om.fi Website: http://www.tietosuoja.fi/en/</p>	<p>France Commission Nationale de l'Informatique et des Libertés - CNIL 8 rue Vivienne, CS 30223 F-75002 Paris, Cedex 02 Tel. +33 1 53 73 22 22 Fax +33 1 53 73 22 00 Website: http://www.cnil.fr/</p>
<p>Germany Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit Husarenstraße 30 53117 Bonn Tel. +49 228 997799 0; +49 228 819950 Fax +49 228 997799 550; +49 228 81995 550 e-mail: poststelle@bfdi.bund.de Website: http://www.bfdi.bund.de/</p>	<p>Greece Hellenic Data Protection Authority Kifisias Av. 1-3, PC 11523 Ampelokipi Athens Tel. +30 210 6475 600 Fax +30 210 6475 628 e-mail: contact@dpa.gr Website: http://www.dpa.gr/</p>
<p>Hungary National Authority for Data Protection and Freedom of Information</p>	<p>Italy Garante per la protezione dei dati personali Piazza di Monte Citorio, 121 00186 Roma</p>

<p>Szilágyi Erzsébet fasor 22/C H-1125 Budapest Tel. +36 1 3911 400 e-mail: peterfalvi.attila@naih.hu Website: http://www.naih.hu/</p>	<p>Tel. +39 06 69677 1 Fax +39 06 69677 785 e-mail: garante@garanteprivacy.it Website: http://www.garanteprivacy.it/</p>
<p>Ireland Data Protection Commissioner Canal House Station Road Portllington Co. Laois Lo-Call: 1890 25 22 31 Tel. +353 57 868 4800 Fax +353 57 868 4757 e-mail: info@dataprotection.ie Website: http://www.dataprotection.ie/</p>	<p>Latvia Data State Inspectorate Director: Ms Daiga Avdejanova Blaumana str. 11/13-15 1011 Riga Tel. +371 6722 3131 Fax +371 6722 3556 e-mail: info@dvi.gov.lv Website: http://www.dvi.gov.lv/</p>
<p>Malta Office of the Data Protection Commissioner Data Protection Commissioner: Mr Joseph Ebejer 2, Airways House High Street, Sliema SLM 1549 Tel. +356 2328 7100 Fax +356 2328 7198 e-mail: commissioner.dataprotection@gov.mt Website: http://www.dataprotection.gov.mt/</p>	<p>Luxembourg Commission Nationale pour la Protection des Données 1, avenue du Rock'n'Roll L-4361 Esch-sur-Alzette Tel. +352 2610 60 1 Fax +352 2610 60 29 e-mail: info@cnpd.lu Website: http://www.cnpd.lu/</p>
<p>Lithuania State Data Protection Žygimantų str. 11-6a 011042 Vilnius Tel. + 370 5 279 14 45 Fax +370 5 261 94 94 e-mail: ada@ada.lt Website: http://www.ada.lt/</p>	<p>Netherlands Autoriteit Persoonsgegevens Prins Clauslaan 60 P.O. Box 93374 2509 AJ Den Haag/The Hague Tel. +31 70 888 8500 Fax +31 70 888 8501 e-mail: info@autoriteitpersoonsgegevens.nl Website: https://autoriteitpersoonsgegevens.nl/nl_1</p>
<p>Poland The Bureau for the Protection of Personal Data - GIODO ul. Stawki 2 00-193 Warsaw Tel. +48 22 53 10 440 Fax +48 22 53 10 441 e-mail: kancelaria@giodo.gov.pl; Website: http://www.giodo.gov.pl/</p>	<p>Portugal Comissão Nacional de Protecção de Dados - CNPD R. de São. Bento, 148-3° 1200-821 Lisboa Tel. +351 21 392 84 00 Fax +351 21 397 68 32 e-mail: geral@cnpd.pt Website: http://www.cnpd.pt/</p>
<p>Romania The National Supervisory Authority for Personal Data Processing Oprescu B-dul Magheru 28-30 Sector 1, BUCUREȘTI Tel. +40 21 252 5599 Fax +40 21 252 5757 e-mail: anspdcp@dataprotection.ro Website: http://www.dataprotection.ro/</p>	<p>Slovakia Office for Personal Data Protection of the Slovak Republic Hraničná 12 820 07 Bratislava 27 Tel.: + 421 2 32 31 32 14 Fax: + 421 2 32 31 32 34 e-mail: statny.dozor@pdp.gov.sk Website: http://www.dataprotection.gov.sk/</p>
<p>Slovenia Information Commissioner Ms Mojca Prelesnik Zaloška 59 1000 Ljubljana Tel. +386 1 230 9730 Fax +386 1 230 9778 e-mail: gp.ip@ip-rs.si Website: https://www.ip-rs.si/</p>	<p>Spain Agencia de Protección de Datos C/Jorge Juan, 6 28001 Madrid Tel. +34 91399 6200 Fax +34 91455 5699 e-mail: internacional@agpd.es Website: https://www.agpd.es/</p>
<p>Sweden Datainspektionen Drottninggatan 29 5th Floor Box 8114 104 20 Stockholm Tel. +46 8 657 6186 Fax +46 8 652 8652 e-mail: datainspektionen@datainspektionen.se Website: http://www.datainspektionen.se/</p>	<p>United Kingdom The Information Commissioner's Office Water Lane, Wycliffe House Wilmslow - Cheshire SK9 5AF Tel. +44 1625 545 745 e-mail: international.team@ico.org.uk Website: https://ico.org.uk</p>

EUROPEAN FREE TRADE AREA (EFTA)

Iceland Icelandic Data Protection Agency Rauðarárstíg 10 105 Reykjavík Tel. +354 510 9600; Fax +354 510 9606 e-mail: postur@personuvernd.is	Liechtenstein Data Protection Office Kirchstrasse 8, P.O. Box 684 9490 Vaduz Principality of Liechtenstein Tel. +423 236 6090 e-mail: info.dss@llv.li
Norway Datatilsynet The Data Inspectorate P.O. Box 8177 Dep 0034 Oslo Tel. +47 22 39 69 00 Fax +47 22 42 23 50 e-mail: postkasse@datatilsynet.no	Switzerland Data Protection and Information Commissioner of Switzerland Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter Mr Adrian Lobsiger Feldeggweg 1, 3003 Bern