

**PRIVACY POLICY**

**of**

**A WTS Klient Könyvelő Korlátolt Felelősségű Társaság and  
WTS Klient Adótanácsadó Korlátolt Felelősségű Társaság**

**(hereinafter: Privacy Policy)**

*Effective as of 25 May 2018*

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## Data Controllers

<b>Data Controllers</b>	<p>With regard to the data controlling activities specified in this Privacy Policy the purposes and means of the personal data controlling have been defined jointly by the following data controllers:</p> <ul style="list-style-type: none"><li>(i) WTS Klient Könyvelő Korlátolt Felelősségű Társaság (registered seat: 1143 Budapest, Stefánia út 101-103; company registration no.: Cg. 01-09-930353; hereinafter: Data Controller-1)</li><li>(ii) WTS Klient Adótanácsadó Korlátolt Felelősségű Társaság (registered seat: 1143 Budapest, Stefánia út 101-103.; company registration no.: Cg. 01-09-978231; hereinafter: Data Controller-2)</li></ul> <p>With respect to the above Data Controller-1 and Data-Controller-2 shall be deemed as joint controllers, therefore their responsibility is joint and several. Hereinafter Data Controller shall mean Data Controller-1 and Data-Controller-2 jointly.</p>
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	<i>Data Controller-1</i>	<i>Data Controller-2</i>
<b>Representatives of the Data Controller and their contact details</b>	Zoltán Lambert managing director tel.: +36-1-887-3700 email: zoltan.lambert@wtsklient.hu	Zoltán Lambert managing director tel.: +36-1-887-3700 email: zoltan.lambert@wtsklient.hu
	György Kőrösi managing director tel.: +36-1-887-3700 email: gyorgy.korosi@wtsklient.hu	Tamás Gyányi managing director tel.: +36-1-887-3700 e-mail: tamas.gyanyi@wtsklient.hu
	Eszter Balogh managing director tel.: +36-1-887-3700 email: eszter.balogh@wtsklient.hu	
	Andrea Potássy managing director tel.: +36-1-887-3700 email: andrea.potassy@wtsklient.hu	

<b>Email address, telephone and fax number of the Data Controller</b>	email: <a href="mailto:info@wtsklient.hu">info@wtsklient.hu</a>
	tel.: +36-1-887-3700
	fax.: +36-1-887-3799

<b>Webpage</b>	<a href="https://wtsklient.hu/">https://wtsklient.hu/</a>
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<b>Social media</b>	Facebook <a href="https://www.facebook.com/wtsklient/">https://www.facebook.com/wtsklient/</a>
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LinkedIn

<https://www.linkedin.com/company/wts-hungary/>

Youtube channel

<https://www.youtube.com/channel/UC3O9kDMnXDNsf4zNZfH9E8w>

## Definitions

For the purposes of this Privacy Policy:

- 1.1 *data subject* means the natural person identified or identifiable on the basis of his / her personal data, including but not limited to the natural person who
  - subscribes to the newsletter of the Data Controller,
  - contacts the Data Controller via post, telephone, fax, via email by sending an email to the [info@wtsklient.hu](mailto:info@wtsklient.hu) email address, by giving its personal data on the webpage or a social media platform for the purpose of requesting an offer,
  - submits his / her application to the Data Controller for an open position / trainee programme and / or including it in the applicant database of the Data Controller.
  
- 1.2 *personal data* means any information relating to an identified or identifiable data subject. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
  
- 1.3 *Data Controller*: Please see Section 1. of this Privacy Policy.
  
- 1.4 *data processing* means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
  
- 1.5 *data processor* means a natural or legal person, which processes personal data on behalf of the data controller. The list of data processors is attached under this Privacy Policy under Annex 1.
  
- 1.6 *consent* of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the controlling of personal data relating to him or her;
  
- 1.7 *Authority* means the National Authority for Data Protection and Freedom of Information (in Hungarian: Nemzeti Adatvédelmi és Információszabadság Hatóság).

## Data controlling practice of the Data Controller

The Data Controller is committed to the protection of personal data of data subjects and respects their right to informational self-determination.

In order to secure the rightful, fair and transparent controlling of the personal data of data subjects, the Data Controller presents in detail its data controlling practice in this Privacy Policy concerning the data controlling activities specified in this Privacy Policy.

The Data Controller declares that his data controlling practice has been formed based especially on the following laws:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: **GDPR**)
- Hungarian Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information;
- Hungarian Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

The Data Controller emphasizes that his data controlling practice corresponds to the legislation in force and complies with the best practices of the Authority. With respect thereof, the Data Controller reviews his data controlling practice regularly.

The privacy policy in force can be found under the following links <https://wtsklient.hu/en/data-protection-declaration/> and <https://wtsklient.hu/de/datenschutzmitteilung/> and the printed version thereof can be found in 1143 Budapest, Stefánia út 101-103.

## Principles

The Data Controller complies with the following principles during his data controlling practice:

Principle	Fulfilment of the principle in the controlling practice of the Data Controller
<b>Lawfulness, right to a fair trial and transparency</b>	The Data Controller acts in compliance with the legislation in force and respects the right of data subjects to protection of personal data and to informational self-determination. The Data Controller prepares perspicuous, easy-to-read privacy policy in a table form for each controlling activity. The Data Controller ensures that the privacy policy in effect is accessible for data subjects.
<b>Purpose limitation</b>	The Data Controller determines precisely the purpose of the data controlling for each data controlling activity and the purpose of data controlling with regard to the different data categories. The Data Controller is not entitled to use the personal data for a different purpose.
<b>Data minimisation</b>	The Data Controller endeavours to process exclusively the personal data that are required for the performance of the purposes defined for each data controlling activity.

<b>Accuracy</b>	The Data Controller reviews the processed data regularly and, in case of inaccuracy, it rectifies or erases them.
<b>Storage limitation</b>	The Data Controller stores the personal data as long as it is necessary for the purposes of which the personal data are processed. The Data Controller defines the term of the data controlling for each data controlling activity.
<b>Integrity and confidentiality</b>	The Data Controller endeavours to ensure the appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage of data, by using appropriate technical or organisational measures. The Data Controller possesses ISO 27001 certification (standard for Information Security Management System).
<b>Accountability</b>	The Data Controller shall be responsible for, and be able to demonstrate compliance with, the present principles. For the sake of this goal the Data Controller intends to document its data controlling practice in as much detail as possible.

## Rights of data subjects and exercise of rights

### 5.1 Rights of the data subject

<b>Rights of information (right to access)</b>	<p>The data subject shall have the right to access personal data stored concerning him or her by the Data Controller and has the right to obtain the following information:</p> <ul style="list-style-type: none"> <li>- the categories and source of the processed data;</li> <li>- purpose and legal basis of data controlling;</li> <li>- duration of data controlling;</li> <li>- person of the Data Processor and the data processing operations performed by the Data Processor;</li> <li>- subject and legal basis of data transfer, the description of the transferred data;</li> <li>- personal data breach, its circumstances, effects and the measures implemented prevent such breaches;</li> <li>- rights of the data subject and the way of exercising those.</li> </ul>
<b>Right to data portability</b>	<p>The data subject shall have the right to,</p> <ol style="list-style-type: none"> <li>(i) receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format (for example in a .doc, pdf. format) and</li> <li>(ii) have the right to transmit those data to another controller without hindrance from the Data Controller,</li> </ol> <p>under the following consecutive conditions</p>

- the data controlling is based on consent or on a contract and
- the data processing is carried out by automated means (namely non-paper based).

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

### **Right to rectification**

In case the data subject believes that the personal data concerning him / her are inaccurate, erroneous or incomplete, the data subject shall have the right to request the Data Controller the rectification or the correction of the concerned data.

### **Right to erasure (right to be forgotten)**

The data subject shall have the right that upon his / her request the Data Controller erases the personal data concerning him / her in the following cases:

- further processing is not required for the purposes it was collected or processed;
- the purpose of data controlling no longer exists or the duration of the data controlling period stipulated by law expired;
- if it is ordered by court or the Authority;
- if the data subject objects against the data controlling and a prior legal basis for processing no longer exists;
- the Data Controller processed the personal data unlawfully;
- the erasure of data is needed for the fulfilment of requirements ordered by law of the member state or the European Union.

Where the Data Controller has made the personal data public and is obliged to erase the personal data in accordance with the above, the Data Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are controlling the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data (for example erasure from among search results of browsers).

The Data Controller draws attention of data subjects to the following significant limitations of the right to erasure:

- compliance with a legal obligation which requires data controlling by European Union or Member State law to which the Data Controller is subject;
- data controlling is required for archiving purposes in the public interest, scientific or historical research



purposes or statistical purposes, if the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;

- establishment, exercise or defence of legal claims.



**Right to restriction of data controlling (right to block)**

The data subject shall have the right to obtain from the Data Controller restriction of data controlling where one of the following applies:

- the accuracy of the personal data is contested by the data subject (for a period enabling the Data Controller to verify the accuracy of the personal data);
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Data Controller no longer needs the personal data for the purposes of the data controlling, but the data is required for the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing (pending the verification whether the legitimate grounds of the controller override those of the data subject).

Where data controlling has been restricted as per the above, such personal data may - with the exception of storage - be processed only with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.

The data subject who has obtained restriction of data controlling shall be informed by the Data Controller before the restriction of data controlling is lifted.



**Right to object**

The data subject has the right to object to controlling of his or her data (including profiling) and may order the Data Controller to stop the controlling of his or her personal data, if his or her personal data were used for the following purposes:

- processing is necessary for the purposes of the right or legitimate interests pursued by the Data Controller, except for the case of mandatory data controlling,
- where personal data are used or transferred for direct marketing, public survey or scientific purposes,
- in other cases, stipulated by law.

If the Data Controller finds the objection of the data subject reasoned, it ceases the data controlling – including further data record and data transfer –, it blocks the data and informs about the objection the previous transferees and those who shall make measures in connection with the

objection. In case the data subject does not agree with the decision of the Data Controller or the Data Controller misses the prescribed deadline, the data subject may seek for juridical remedy within 30 days from the time of the notification of the decision or the deadline.

## 5.2 Exercise of rights

**How can the data subject exercise his / her rights?**

- in writing, by sending it electronically to the following email address: gyorgy.korosi@wtsklient.hu
- in writing, by post to the following address: 1143 Budapest, Stefánia út 101-103.
- in person, verbally in 1143 Budapest, Stefánia út 101-103. or by phone at +36-1-887-3700 on weekdays from 12 midday to 2 p.m.

**Within how many days is the Data Controller obliged to make the necessary measures?**

The Data Controller shall take the necessary measures without delay, but latest within 15 days from the receipt/delivery of the claim.

**In which form are the data subjects informed by the Data Controller?**

- in case of a written request sent by email, the Data Controller informs the data subject via email, unless it is expressly requested by the data subject otherwise
- in case of a written request sent by post, the Data Controller informs the data subject in a letter sent by post, unless it is expressly requested by the data subject otherwise
- in case of a request submitted in person or by phone, the Data Controller informs the data subject via email or in a letter sent by post to the address or email address given by the data subject

**What kind of measures are taken by the Data Controller?**

The Data Controller

- gives information,
- erasures / rectifies / restricts (blocks) the data, or
- makes other measures

in accordance with the request of the data subject, if no ground for exclusion exists.

Besides the data subjects, the Data Controller informs the persons to whom previously the data was transferred or given for the purpose of processing, of the rectification, erasure, blocking of data controlling. Upon request of the data subject, the Data Controller informs him / her about these addressees. The Data Controller dismisses this information requirement, if it does not harm the legitimate interest of the data subject with regard the purpose of the data controlling.

**What happens, if rights cannot be exercised?**

The latest within 15 days from the delivery/receipt of the claim, the Data Controller shall inform the data subject in writing also if the data subject cannot exercise his/her rights for any reason.

The Data Controller shall designate

- the matters of fact and law, why the rights cannot be exercised, and
- the remedies available for the data subject (juridical remedy, lodging a complaint with the Authority).

**Where can the data subject seek remedies?**

1. Complaint with the Authority

You may lodge a complaint with the Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information)

Address: 1125 Budapest,  
Szilágyi Erzsébet fasor 22/c  
telephone: +36 (1) 391-1400  
fax: +36 (1) 391-1410  
web page: <http://www.naih.hu>  
email address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

2. Judicial remedy

In case of any violation of your rights, you may seek judicial remedy. The court shall hear such cases in a priority proceeding. The Data Controller shall evidence that the data proceeding meets the legal requirements. The action shall fall within the competence of the tribunal court, you may choose to bring the action before the tribunal court in the jurisdiction according to your home address or your habitual residence.

## Activities affected by data controlling

### 6.1 *Sending application for an open position / trainee programme published by the Data Controller and / or to the applicant database of the Data Controller*

<b>Who is the data subject?</b>	Data subject is the applicant, who sends his / her application for the purpose(s) described in this Privacy Policy.												
<b>Scope of processed data and purpose of data controlling</b>	<p>The Data Controller processes the application sent by the applicant (data subject) to the open position / trainee programme or the applicant database for the following purposes:</p> <ul style="list-style-type: none"> <li>- application for open position / trainee programme, the consideration of the application, information and / or</li> <li>- informing the applicant (data subject) about future job offers which might fit the qualification and professional background of the applicant (data subject).</li> </ul>												
<b>Processed data</b>	<p>The Data Controller processes the personal data of the applicant which were given by the data subject in connection with the application for an open position / trainee programme published by the Data Controller and / or to the applicant database of the Data Controller:</p> <table border="0"> <tr> <td data-bbox="674 1002 1299 1034">(i) name, mother's name, place and date of birth</td> <td data-bbox="1626 1002 1785 1034">identification</td> </tr> <tr> <td data-bbox="674 1066 813 1098">(ii) image</td> <td data-bbox="1626 1066 1785 1098">identification</td> </tr> <tr> <td data-bbox="674 1129 1267 1161">(iii) address, email address, telephone number</td> <td data-bbox="1659 1129 1751 1161">contact</td> </tr> <tr> <td data-bbox="674 1193 1048 1225">(iv) information about studies</td> <td data-bbox="1435 1193 1977 1225">information required for the scope of the job</td> </tr> <tr> <td data-bbox="674 1257 1171 1289">(v) information regarding previous jobs</td> <td data-bbox="1435 1257 1977 1289">information required for the scope of the job</td> </tr> <tr> <td data-bbox="674 1321 1346 1385">(vi) information about language and other skills and competencies</td> <td data-bbox="1435 1321 1977 1385">information required for the scope of the job</td> </tr> </table>	(i) name, mother's name, place and date of birth	identification	(ii) image	identification	(iii) address, email address, telephone number	contact	(iv) information about studies	information required for the scope of the job	(v) information regarding previous jobs	information required for the scope of the job	(vi) information about language and other skills and competencies	information required for the scope of the job
(i) name, mother's name, place and date of birth	identification												
(ii) image	identification												
(iii) address, email address, telephone number	contact												
(iv) information about studies	information required for the scope of the job												
(v) information regarding previous jobs	information required for the scope of the job												
(vi) information about language and other skills and competencies	information required for the scope of the job												

	(vii) other information listed in the resume	information required for the scope of the job
	(viii) the result of a professional and / or a language test, if the applicant fills in a professional and / or a language test	information required for the scope of the job
	(ix) note prepared by the Data Controller in the interview concerning the applicant (data subject)	information required for the scope of the job

**What is the source of the data?** The applicant (data subject) submits the Data Controller himself / herself his / her resume via email into the email address stated in the job advertisement, during the interview and as a result of filling in the professional and / or language test.

**Does the Data Controller inspect applicant's (data subject's) profile created on any social media platform during the recruitment process?**

The Data Controller (Data Processor) may inspect the applicant's (data subject's) Facebook and / or LinkedIn profile during the recruitment process.

The Data Controller (Data Processor) inspects the part of the publicly available and accessible profile created on the social media platform being relevant from the perspective of the position. Data Controller (Data Processor) does not search in closed groups or other non- or partially non-public places for information about the applicant (data subject).

The Data Controller (Data Processor) may draw conclusions from the profile created on a social media platform, but does not make further operation, for example the Data Controller (Data Processor) does not save or forward the profile of the applicant (data subject) created on a social media platform.

**Who is entitled to process the data?** The data may be known and be processed by those employees of the Data Controller whose scope of job includes the fulfilment of the data controlling purposes.

**Which is the legal basis of data controlling (lawfulness of processing)?**

if the purpose of data controlling is the application for open position / trainee programme, the consideration of the application



the data controlling is necessary for making the necessary steps initiated by the applicant (data subject) before conclusion of the employment / trainee employment contract [GDPR Article 6. Section (1) Point b)]

if the purpose of data controlling is the application for open position / trainee programme, the consideration of the application and informing the applicant (data subject) about future job offers, which might fit the applicant's (data subject's) qualification and professional background



the data controlling is necessary for making the necessary steps initiated by the applicant (data subject) before conclusion of the employment / trainee employment contract [GDPR Article 6. Section (1) Point b)] and the freely given consent of the applicant (data subject) [GDPR Article 6. Section (1) Point a)]

if the purpose of data controlling is informing the applicant (data subject) about future job offers, which might fit the applicant's (data subject's) qualification and professional background



freely given consent of the applicant (data subject) [GDPR Article 6. Section (1) Point a)]

**What is the period of data controlling?**

if the purpose of data controlling is the application for open position / trainee programme, the consideration of the application



until the closing of the recruitment process or, before that, the erasure on request

if the purpose of data controlling is the application for open position / trainee programme, the consideration of the application and informing the applicant (data subject) about future job offers, which might fit the applicant's (data subject's) qualification and professional background



based on the declaration of the applicant (data subject) for two years from the closing of the recruitment process or, before that, until the erasure on request



if the purpose of data controlling is informing the applicant (data subject) about future job offers, which might fit the applicant's (data subject's) qualification and professional background



based on the declaration of the applicant (data subject) for two years from the delivery of the application to the Data Controller or, before that, until the erasure on request

**Can the applicant (data subject) withdraw its consent to data controlling?**

The Data Controller informs the applicant (data subject), that he / she can withdraw his / her consent to data controlling anytime.

The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Description of the procedure**

- (i) *Application for open position / trainee programme published by the Data Controller*
  - The Data Controller publishes its open positions / trainee programme on the following webpage: <https://wtsklient.hu/karrier/>. The Data Controller might publish its open positions / trainee programmes on carrier portals and might involve contributors as well.
  - The applicant (data subject) sends his / her resume to the Data Controller to the email address indicated in the description of the open position / trainee programme selected by the applicant (data subject).
  - The Data Controller inspects the received application from professional aspects, and calls up the professionally adequate applicants for a personal interview.
  - During the interview a professional and / or a language test might take place depending on the decision of the Data Controller.
  - The Data Controller informs the data subjects not selected the for the interviews or not engaged that they were not selected for the open position.
  - Based upon the declaration of the applicant (data subject) made after the closing of the recruitment process, the Data Controller
    - a) destructs the application eventually received in a paper form, provided that the applicant (data subject) did not request to send that back via post;
    - b) erases the application received in an electronical form, and destructs the data existing in a paper form; or
    - c) processes the application for two years from the closing of the recruitment process / the delivery of the application to the Data Controller or, until its erasure upon request (in case of a new open



position, the Data Controller compares the data with the professional requirements of the new position and in case of a positive result, contacts the data subject).

- The special requirements for the application into trainee programme are described on the webpage.

*(ii) Application into the database of the Data Controller*

- The applicant (data subject) may also apply to the database of the Data Controller in the lack of an actual open position by sending his / her application (resume) via email. In this case the Data Controller shall always receive the consent of the applicant (data subject) for the data control.
- In case of a new open position, the Data Controller compares the data with the professional requirements of the new position and in case of a positive result, contacts the data subject.

## 6.2 Sending newsletters

<b>Who is the data subject?</b>	Data subject is the natural person who subscribes to the newsletter service by giving his /her personal data.										
<b>What is the purpose of data controlling?</b>	The purpose of data controlling is sending email newsletters containing also commercial advertisements, informing the data subject about news and the services of the Data Controller.										
<b>Scope of processed data and purpose of data controlling</b>	<table><tr><td>name (mandatory given by the data subject)</td><td>identification</td></tr><tr><td>email address (mandatory given by the data subject)</td><td>sending newsletter</td></tr><tr><td>CRM identification number</td><td>registration</td></tr><tr><td>fact and date of subscription</td><td>recording the consent</td></tr><tr><td>analytical data (date and time of activity) in connection with sending, delivering and opening the messages</td><td>preparing statistics</td></tr></table>	name (mandatory given by the data subject)	identification	email address (mandatory given by the data subject)	sending newsletter	CRM identification number	registration	fact and date of subscription	recording the consent	analytical data (date and time of activity) in connection with sending, delivering and opening the messages	preparing statistics
name (mandatory given by the data subject)	identification										
email address (mandatory given by the data subject)	sending newsletter										
CRM identification number	registration										
fact and date of subscription	recording the consent										
analytical data (date and time of activity) in connection with sending, delivering and opening the messages	preparing statistics										
<b>What is the source of the data?</b>	The data subject himself / herself submits the data by subscribing to the newsletter / opening the newsletter.										
<b>Who is entitled to process the data?</b>	The data may be known and be processed by those employees of the Data Controller whose scope of job includes the fulfilment of the data controlling purposes.										
<b>Which is the legal basis of data controlling</b>	The legal basis of data controlling is the freely given consent of the applicant (data subject) [GDPR Article 6. Section (1) Point a)].										

(lawfulness of processing)?

What is the period of data controlling?

Until erasure upon request.

Can the data subject withdraw its consent to data controlling?

The Data Controller informs the applicant (data subject) that he / she can withdraw his / her consent to data controlling anytime (please see the description of the process).

The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Description of the process

(i) Subscription to newsletters

The data subject may subscribe to newsletters by giving the above listed data, as follows:

- a) electronically on the <https://wtsklient.hu/hirlevel-feliratkozas/> webpage;
- b) by giving a consent in a paper form (adoption into the manual database).

(ii) Unsubscribe from newsletters (withdrawal of the consent)

The data subject may unsubscribe from the newsletter any time as follows:

- a) by clicking to unsubscribe link, which can be found on the bottom of each newsletter;
- b) via email, by sending a request to unsubscribe to [info@wtsklient.hu](mailto:info@wtsklient.hu) email address;
- c) via post by sending a request to unsubscribe to the following address: 1143 Budapest Stefánia út 101-103.;
- d) by phone at the following number: +36-1-887-3700.

(iii) Review of the newsletter subscription list:

The Data Controller reviews the newsletter subscription list every 4 year and requests for the confirmation of consent for sending newsletters, furthermore, the Data Controller requests the data subject to control the accuracy of his /her data and to correct those if necessary. With respect of those data subjects who



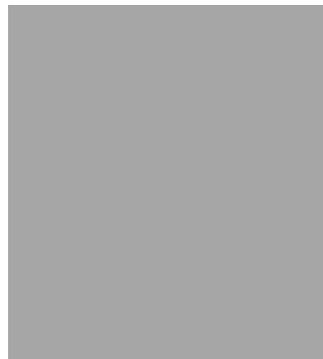
do not give a confirmation for sending newsletters within 30 days after receiving the email, the Data Controller deletes their data from the database on the 31<sup>st</sup> day.

(iv) Statistics

The Data Controller monitors the reading of newsletters. For that effect, based on the clicks to the links in the newsletters, it monitors and records if the data subject has opened the email or deleted it without opening it, and also the number of clicks to the links.

6.3 Other data controlling of direct marketing purposes

<b>Who is the data subject?</b>	The data subject is the natural person who provides his / her personal data in order that the Data Controller saves those in its database and processes the personal data for contact and direct marketing purposes other than sending newsletters as described in Section 6.2 of this Privacy Policy.	
<b>What is the purpose of data controlling?</b>	The purpose of data controlling is sending letters (for example information about actual events, sending invitations) including direct marketing tools and commercial advertisements other than sending newsletters as described in Section 6.2 of this Privacy Policy, follow-up of reactions to such messages, personalisation of email messages by using other information (company name) given by the subscribed users, keeping contact.	
<b>Scope of processed data and purpose of data controlling</b>	<p>name (mandatory given by the data subject)</p> <p>email address (mandatory given by the data subject)</p> <p>telephone number</p> <p>company name</p> <p>registered seat of the company</p> <p>position/division</p> <p>fact of the consent to being contacted for direct marketing purposes</p>	<p>identification</p> <p>contacting for direct marketing purposes</p> <p>contacting for direct marketing purposes</p> <p>contacting for direct marketing purposes, market research, offering services, personalising of direct marketing tools</p> <p>contacting for direct marketing purposes</p> <p>contacting for direct marketing purposes</p> <p>recording the consent</p>



date of giving consent to direct marketing communication

recording the consent

analytical data in connection with the sending and delivery of messages (for example date and time of activity, identity)

creating statistics

**What is the source of the data?**

The data subject himself / herself submits the data.

**Who is entitled to process the data?**

The data may be known and be processed by those employees of the Data Controller whose scope of job includes the fulfilment of the data controlling purposes.

**Which is the legal basis of data controlling (lawfulness of processing)?**

The legal basis of data controlling is the freely given consent of the data subject [GDPR Article 6. Section (1) Point a)].

**What is the duration of data controlling?**

Until erasure upon request.

**Can the data subject withdraw its consent to data controlling?**

The Data Controller informs the data subject that he / she can withdraw his / her consent to data controlling anytime (please see the description of the process).

The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Description of the  
process**

(i) Consent to data controlling for direct marketing purposes

The data subject may subscribe to data controlling for direct marketing purposes by giving the above listed data as follows:

- c) electronically on the <https://wtsklient.hu/hirlevel-feliratkozas/> webpage;
- d) by giving a consent in a paper form (adoption into the manual database).

(ii) Withdrawal of the consent concerning data controlling for direct marketing purposes

The data subject may withdraw his / her consent for data controlling for direct marketing purposes anytime, as follows:

- e) by clicking to unsubscribe link, which can be found on the bottom of the emails;
- f) via email, by sending a request to [info@wtsklient.hu](mailto:info@wtsklient.hu) email address;
- g) via post by sending a request to the following address: 1143 Budapest Stefánia út 101-103.;
- h) by phone on the following number: +36-1-887-3700.

(iii) Review of the newsletter list:

The Data Controller reviews its database every 4 year and requests for the confirmation of the consent to the data controlling of direct marketing purposes, furthermore the Data Controller requests the data subject to control the accuracy of his /her data and to correct those if necessary. With respect of those data subjects who do not give a confirmation of the consent for data controlling for direct marketing purposes within 30 days after receiving the email, the Data Controller deletes them from the database on the 31<sup>st</sup> day.

(iv) Statistics

The Data Controller monitors the reading of newsletters. For that effect, based on the clicks to the links in the newsletters, it monitors and records if the data subject has opened the email or deleted it without opening it, and also the number of clicks to the links.

#### 6.4 Request for an offer

##### Who is the data subject?

The data subject is the natural person who contacts the Data Controller upon his / her choice personally / on the phone / by fax / via email / via post/ on the webpage and besides giving his / her personal data (name and contact details up to his / her choice), he / she requests for an offer for services offered by the Data Controller.

##### What is the purpose of data controlling?

The purpose of data controlling is giving the offer and keeping contact.

##### Scope of processed data and purpose of data controlling

name	identification
email address	contact
telephone number	contact
company name	giving the offer
position	giving the offer
scope of offer request	giving the offer
content of offer request	giving the offer
date of offer request	giving the offer
content of the offer	giving the offer

##### What is the source of data?

The data subject himself / herself submits the data.

<b>Who is entitled to process the data?</b>	The data may be known and be processed by those employees of the Data Controller whose scope of job includes the fulfilment of the data controlling purpose.
<b>Which is the legal basis of data controlling (lawfulness of processing)?</b>	Before the request for offer, the legal basis of data controlling is the freely given consent of the data subject [GDPR Article 6. Section (1) Point a)]. After giving the offer, the legal basis of data controlling is that such is necessary for taking steps at the request of the data subject before concluding a contract and for the performance of the contract [GDPR Article 6. Section (1) Point b)].
<b>What is the duration of data controlling?</b>	<p>The duration of the controlling lasts</p> <ul style="list-style-type: none"> <li>(i) until erasure upon request, before giving the proposal or in case of non-acceptance of the offer,</li> <li>(ii) until the lapse of the rights and obligations deriving from the legal relation concluded, if the offer is accepted,</li> <li>(iii) if the offer does not get accepted, after 2 years of giving the offer.</li> </ul>
<b>Can the data subject withdraw its consent to data controlling?</b>	<p>The Data Controller informs the data subject that he / she can withdraw his / her consent to data controlling anytime (please see description of the process).</p> <p>The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p>
<b>Description of the process</b>	<ul style="list-style-type: none"> <li>- The data subject contacts the Data Controller upon his / her choice personally / on the phone / by fax / via email / via post/ on the webpage by giving his / her personal data (name and contact details up to his / her choice) in order to request an offer for the services offered by the Data Controller.</li> <li>- The data subject gives his / her freely given consent to being contacted by the Data Controller in order to give an offer on the contact details (telephone number / email address / address) provided of his / her choice.</li> <li>- The Data Controller gives an offer to the data subject on his / her contact details by telephone number / email address / address based on his / her choice.</li> </ul>

6.5 Presence on social media platform (Facebook, LinkedIn, Youtube)

<b>Who is the data subject?</b>	Data subject is the natural person who follows the social media sites of the Data Controller, follows, shares and likes the content shared there.						
<b>What is the purpose of data controlling?</b>	The purpose of data controlling is sharing, publication of the content of the webpage on the social media platform. The Data Controller only contacts the data subject, and therefore the purpose of data controlling becomes relevant, if the data subject contacts the Data Controller via the social platform.						
<b>Scope of processed data and purpose of data controlling</b>	<table><tr><td>public name</td><td>identification</td></tr><tr><td>public photo</td><td>identification</td></tr><tr><td>message sent and received on social media platform</td><td>responding</td></tr></table>	public name	identification	public photo	identification	message sent and received on social media platform	responding
public name	identification						
public photo	identification						
message sent and received on social media platform	responding						
<b>What is the source of data?</b>	The data subject submits himself / herself the data.						
<b>Who is entitled to process the data?</b>	The data may be known and be processed by those employees of the Data Controller whose scope of job includes the fulfilment of the data controlling purposes.						
<b>Which is the legal basis of data controlling (lawfulness of processing)?</b>	The legal basis of data controlling is the freely given consent of the data subject [GDPR Article 6. Section (1) Point a)].						
<b>What is the duration of data controlling?</b>	Until giving response or until erasure upon request.						

**Can the data subject withdraw his / her consent to data controlling?**

The Data Controller informs the data subject that he / she can withdraw his / her consent to data controlling anytime (please see description of the process).

The withdrawal shall be applied to the future; therefore, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Description of the process**

- The Data Controller is available on social media platforms Facebook/LinkedIn/Youtube, on these platforms the Data Controller shares news, events, videos and the contents which can be found on the webpage.
- The data subject gives its consent to share the news, events, videos of the Data Controller on his /her message board by clicking into "like" or „share" links.
- The data subject may be informed about the data controlling of Facebook/LinkedIn/Youtube on their webpage.

## 6.6 Further data controlling

Concerning the data controlling activities not presented in this Privacy Policy, the Data Controller informs the data subjects upon recording the data.

### Data transfers

Personal data are basically processed by the Data Controller, or, in case of outsourcing such activity, it is carried out by data processors listed under Annex 1 to this Privacy Policy. In that case the Data Controller provides data to the Data Processors and the Data Controller is liable for his / her / their activities.

The Data Controller may forward personal data in case of a request by an authority based on provisions of law.

### Cookie policy of the <https://wtsklient.hu> webpage

The Data Controller uses cookies in order to optimize the structure and the content of the webpage for visitors. Cookies used by the Data Controller:

- performance cookies: the aim of these cookies is to optimize the practicality of the webpage for visitors

and

- cookies used for preparing statistics: these cookies are the cookies of Google Analytics, by using of which the Data Controller receives anonym statistics on the activity of the visitors of the webpage. With respect to such cookies, users receive an ID which cannot be linked to actual persons, visitors cannot be identified based upon their ID.

The cookies used on this webpage are not suitable for collecting personal data or the identification of visitors. The Data Controller does not store the personal data of visitors and does not conduct remarketing survey on the habits of visitors. The Data Controller does not use own cookies suitable for collecting personal data on the webpage.

### Data security

The Data Controller ensures the security of the data; therefore, the Data Controller implements appropriate technical and organisational measures (for example: pseudonymisation and encryption; assurance of the ongoing confidentiality, integrity, availability and resilience of processing systems and service measures; testing, assessment and evaluation of the processing system) in order to ensure a level of security appropriate to the risk. Furthermore, the Data Controller intends to take into consideration the actual state of technical development when defining and implementing the technical and organisational measures. The Data Controller guarantees the fulfilment of data security by internal policies, orders and procedures.

With respect to security of information technology, the Data Controller ensures especially:

- measures against the unauthorized access to personal data, including the physical and logical protection of the software and hardware tools and devices;
- measures for possibility of recovering the data, including regular backups and separate handling of backups;
- anti-virus protection of the data.

The Data Controller is certified by ISO 27001 (standard for Information Security Management System).

This Privacy Policy has been prepared in Hungarian and in English languages. In case of any discrepancies between the Hungarian and the English text, the Hungarian version shall prevail.

## Annex 1. – Data Processors

- (i) *Klient Holding Szolgáltató Korlátolt Felelősségű Társaság (registered seat: 1143 Budapest, Stefánia út 101-103.; company registration number: Cg.01-09-730729)*
- collecting the applications for open positions / trainee programme / Data Controllers database, holding the interviews; keeping contact with applicants
  - maintaining the newsletter and the direct marketing database of the Data Controller, direct marketing approaches, content provision service for the webpage; maintaining the social media platforms of the Data Controller
  - server hosting, system administration activity
  - provision the technical background for giving offers
- (ii) *Soulware Zártkörűen Működő Részvénytársaság (registered seat: 1031 Budapest, Záhony utca 7.; company registration number: Cg.01-10-046527)*
- provision of technical functions in connections with newsletters and direct marketing database, provision of technical functions in connection with sending the newsletters, provision of technical background, CRM development activities
- (iii) *Nákovics László private entrepreneur (tax number: 68558699143; registration number: 51919669)*
- provision of the technical background in connection with the <https://wtsklient.hu/> webpage, development
- (iv) *ALT Kereskedelmi Korlátolt Felelősségű Társaság (registered seat: 1033 Budapest, Szentendrei út 95.; registration number: Cg.01-09-072469)*
- system administration activity