

## Privacy Policy

The purpose of the present Privacy Policy is to inform the clients of MATRITEL Group (hereinafter Provider) about the handling of their personal data and also about the granted rights, the data handling policy and the principles applied for data protection and data handling by the Provider according to the Act CXII. of 2011 (hereinafter: Info law) on information self-determination and freedom of information included in the European Parliament and Council's (EU) 2016/679 regulation (hereinafter: GDPR),

The Provider during the operation of its website ([www.matritel.eu](http://www.matritel.eu)) handles the data of the visitors (hereinafter collectively Concerned) who register, log in and upload curriculum vitae.

The purpose of this Privacy Policy is to ensure for all individuals irrespective of their nationality or domicile that in all aspects of the services rendered by the Provider their rights and fundamental freedom, in particular the right to privacy, are respected during the handling of their personal data.

### 1. Members of the Corporate group that are handling data

<b>Controller enterprise</b>
<p><b>Name: MATRITEL GmbH</b> Company Registration Number: FN428687 y Registering Authority: Firmengericht Korneuburg Tax number: ATU 69318106 Representative: Beatrix Fodor- Kovács general manager <b>Headquarters: Austria, 1210 Wien, Josef-Flandorfer Strasse 76/2</b> <b>Mailing address: Austria, 1210 Wien, Josef-Flandorfer Strasse 76/2</b> <b>Telephone: +43 660 5796826</b> <b>E-mail address: <a href="mailto:office@matritel.eu">office@matritel.eu</a></b> <b>Homepage: <a href="http://www.matritel.eu">www.matritel.eu</a></b></p>

**Controller enterprise**

**Name: MATRITEL Consulting and Provider Limited Liability Company**

Company Registration Number: 01-09-902027

Registering Authority: Metropolitan Court as Court of Registration

Tax number: 14397466-2-42

Representative: Beatrix Fodor-Kovács general manager with individual right of representation

Headquarters: 309., 114-116 Baross Street, Budapest 1082, Hungary

Mailing address: 48. Soroksári Road, Budapest 1094, Hungary

Telephone: +36 70 636 4369

E-mail address: office@matritel.eu

Homepage: [www.matritel.eu](http://www.matritel.eu)

According to the point (1) b) of the GDPR's 37th article the corporate group is in charge of appointing a data protection officer.

The data protection officer of the corporate group :

Name: Beatrix Fodor-Kovács

Availability: datahandling@matritel.eu

**2. The Provider follows the basic principles set in the GDPR's 5th article during the data handling**

- handling personal data in a lawful, fair as well as (for the Concerned) transparent way
- collect personal data only with a purpose that is defined, obvious and lawful and handle them exclusively in a way that is compatible with purpose
- The personal data collected and handled are adequate and relevant from the aspects of data handling and are confined to the essential
- The Provider takes all rational actions in order for the data handled to be accurate and if necessary up to date, immediately deletes or corrects any inaccurate personal data

- The storing of the personal data has to be carried out in a way which makes the identification of the Concerned possible only up to the point when the processing of the personal data is finished
- Appropriate technical and organizational measures to ensure the proper security of personal data, including protection against unauthorized or unlawful handling, accidental loss, destruction or damage to data

### **3. In the course of data processing, the Provider uses definitions defined by Article 4 of the GDPR**

„personal data”: Any information relating to the identified or identifiable natural person ("concerned"). Identifiable is a natural person, who can be identified directly or indirectly, based on one or more factors, in particular by any identifier such as: name, number, positioning data, online identifier, or on the basis of physical, physiological, genetic, intellectual, economic, cultural or social identity

"Data Handling" means any operation or set of operations performed upon personal data or datafiles in an automated or non-automated way such as collecting, recording, organizing, structuring, storing, converting or modifying, interrogating, introspection, using, distributing or otherwise disclosure, aligning or combining, restricting, deleting or destructing.

„restrictiong data handling”: means the designation of stored personal data to limit their future handling.

„profiling”: any form of automated personal data processing during the course of which personal data are used to evaluate certain personal characteristics associated with a natural person, in particular used for analyzing or predicting work performance, economic status, health status, personal preferences, interest, reliability, behavior, place of residence or motion-related features.

„pseudonymisation“: handling personal data so that without the use of additional information it is no more possible to recover the identity of a particular natural person, provided that the additional information is stored separately and by taking technical and organisational measures it is assured that the personal data may not be associated to identified or identifiable natural persons.

„Registration System“: any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

“controller“: any natural or legal person, public authority, agency or any other body, which alone or jointly with others define the purposes and means of processing personal data when the purpose and means of data handling are defined by Union or member state law.

„data processor“: any natural or legal person, public authority, agency or any other body, which processes personal data on behalf of the controller.

„third party“: shall mean any natural or legal person, public authority, agency or any other body that is not identical with the concerned, the controller, the data processor and those who, under the direct authority of the controller or the processor, are authorized to process the data.

„consent of the concerned“: voluntary and concrete disclosure of the Concerned’s will based on appropriate information, with which the Concerned indicates through a statement or an unmistakably expressive act of affirmation that they give his/her consent to handling his/her personal data.

„privacy incident“: means a breach of security leading to accidental or illegal destruction, loss, alteration, unauthorised disclosure, or access of the personal data transmitted, stored or otherwise processed.

„representative”: any natural or legal person established or resident in the Union and indicated by the controller or the data processor in writing according to the Article 27 of the GDPR, who represents the controller or the data processor with regard to the obligations of the controller or data processor under this Regulation.

„enterprise”: any natural or legal person, engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity.

„corporate group”: the controller enterprise and the enterprises overseen by the controller enterprise.

„supervisory authority”: independent public authority established by a Member State on the basis of Article 51 of the GDPR.

„concerned supervisory authority”: an authority which is concerned by the processing of personal data because:

- the controller or data processor is established in the territory of the member state of the supervisory authority;
- the handling of data substantially affects or is likely to substantially affect the concerned residing in the Member State of the supervisory authority ;  
or
- a complaint has been lodged with that supervisory authority.

„cross-border data handling”:

handling of personal data which takes place in the Union and in connection with the business activities performed in several Member States by the controller or data processor that have establishments in more than one Member State

or

(b) Handling personal data within the Union, which is carried out in relation with the only place of performance of a controller or data processor in a way which

substantially affects or is likely to substantially affect data subjects in more than one member state

#### **4. The Provider's legal basis for data handling: legislation that creates the legal possibility or obligation to record, store and handle data**

In some cases, the Service Provider has a legitimate interest in dealing with the personal data of the Concerned, such legitimate interests are, for example, the operation, development and security of our website

As a general rule, we will treat, collect, record, systematize, store and use personal data on the basis of preliminary guidance and voluntary consent of the Concerned and only to the extent necessary and always bound to the purpose.

In some cases the handling of personal data is based on statutory requirements and is mandatory, in such cases we call the attention of the Concerned separately.

The content of this present Privacy Policy applies exclusively to the handling of personal data of natural persons given that the personal data can only be interpreted in relation to natural persons. Anonymous information that is collected by the data handler with the exclusion of personal identification and can not be correlated with a natural person is not considered personal data nor the demographic data that are collected without correlating it with the personal data of identifiable persons thus no connection with a natural person can be established

In all cases where the Provider intends to use the provided data for purposes different from the purpose of the original data recording, it is liable to inform the User and to obtain his/her preliminary, explicit consent or provide him/her with the opportunity to prohibit the use.

When recording, capturing and managing data, it always adheres to the restrictions set forth in the principles and informs the person concerned according to his / her

wishes by electronic mail. The Provider undertakes not to impose any sanction against a User who refuses to provide non-mandatory data.

The Provider undertakes to ensure the security of the data, to take the technical and organizational measures and to establish the procedural rules that ensure that the recorded, stored or processed data are protected, and prevents their destruction, unauthorized use and unauthorized alteration. The Provider also undertakes to call the attention of any third party to whom it lawfully transmits or passes data to fulfill this obligation.

In all cases where the service provided by the Provider is aimed at the use of underage or in cases where it is clear from the data supplied to the Provider that the User is underage, the Provider undertakes to make the use of the service possible, if it can be carried out technically, exclusively from prior parental consent and in such cases makes the use of the service unavailable if there is no consent.

**4/1. The data of the visitor of the website [www.matritel.eu](http://www.matritel.eu)**

The purpose of the data handling: during the site visit, the website hosting provider records the visitor information to check the functionality of the service and to prevent abuses.

The legal basis for data handling is the legitimate interest of the Provider: Article 6 (1) (f) of the GDPR and Info. Law. Article 6 (1) (b)

The range of data processed: date, time, IP address of the user's computer, the address of the page visited, data in relation with the user's operating system and browser.

Duration of handling the data: 365 days from the date of visiting the page.

The webanalytics software of Google Analytics and its external server which helps to monitor and audit the attendance data and other web analytics data.

Further information about the handling of monitored data is provided by the data handler at [www.google-analytics.com](http://www.google-analytics.com)

4/2. Handling data provided or requested through getting into contact via chat without registration to the website [www.matritel.eu](http://www.matritel.eu)

The purpose of data handling: liaising, request for information, providing information.

The legal basis is the legitimate interest of the Provider in accordance with Article 6 (1) (f) of the GDPR and Info. Law. Article 6 (1) (b)

The range of the data processed: fictive visitor identifier and the message itself.

Deadline for deletion: 2 years from the date of disclosure

The data handled are recorded on the website / storage of WIX

4/3. Managing data given or requested through getting into contact (chat), and filling and submitting the contact form (registration) which can be found on the website [www.matritel.eu](http://www.matritel.eu)

The purpose of data handling: liaising, request for information, providing information

The legal basis of data handling is the voluntary consent of the Concerned based on appropriate preliminary information in accordance with Article 6 (1) (a) of the GDPR and Info. Law. Article 5 (1) (a)

The range of the data processed: name, e-mail address, phone number, text of the message, date and time, furthermore any personal data provided by the Concerned, which the Concerned requires to record upon the registration to the contact list.

Deadline for deletion: 2 years from the date of disclosure

The data handled are recorded on the website / storage of WIX.

4/4. Personal data provided in the Resumes sent to [application@matritel.eu](mailto:application@matritel.eu) through the mailing system available on the website [www.matritel.eu](http://www.matritel.eu)

The purpose of data handling: to create the conditions of the placement contract, to fulfill the deliverables defined in the contract and to ensure the conditions of the contract.

The legal basis of data handling is the voluntary consent of the Concerned based on appropriate preliminary information in accordance with Article 6 (1) (a) of the GDPR and Info. Law. Article 5 (1) (a)

The range of the data processed: name, e-mail address, phone number, text of the message, date and time, furthermore any personal data provided by the Concerned, which the Concerned requires to record upon the registration to the contact list.

Deadline for deletion: The Provider evaluates the Resumes received within 30 days from the date of reception. Should the Provider see no possibilities to employ the Concerned within the framework of placement or secondment, following the evaluation it deletes the Concerned's Resume as well as all the personal data.

Should the Provider see the possibility to employ the Concerned in the framework of placement or secondment, sends statement of consent in electronic way to the Concerned about handling his/her CV and other personal data, that are required to be signed afore two witnesses and sent back by post within 30 days. In case of ineffectively elapsed deadline the Provider deletes the CV with all of the Concerned's personal data.

4/5. Personal data provided in the Resumes sent to [application@matritel.eu](mailto:application@matritel.eu) through the mailing system available on the website [www.matritel.eu](http://www.matritel.eu).

The purpose of data handling: to create the conditions of the placement contract, to fulfill the deliverables defined in the contract and to ensure the conditions of the contract.

The legal basis of data handling is the voluntary consent of the Concerned in writing based on appropriate preliminary information in accordance with Article 6 (1) (a) of the GDPR and Info. Law Article 5 (1) (a)

The range of the data processed: name, e-mail address, phone number, text of the message, date and time, furthermore any personal data provided by the Concerned.

Deadline for deletion: 2 years from the date of the reception of written consent.

**4/6. Personal Data of the subscribers for the newsletter of [www.matritel.eu](http://www.matritel.eu)**

The purpose of data handling: send e-mail newsletters to the subscribers of the current information.

The legal basis of data handling is the voluntary consent of the Concerned based on appropriate preliminary information in accordance with Article 6 (1) (a) of the GDPR and Info. Law Article 5 (1) (a)

The range of the data processed: name, e-mail address, date and time of sending and opening, the status of the newsletter (sent, opened, not opened, not deliverable) unsubscription, IP address.

Deadline for deletion: promptly upon the cancellation of the consent, or in 30 days in case of unconfirmed sign up.

The newsletters are sent out through the newsletter module of the WIX system.

The links included in the newsletters contain tracking information, it will be recorded who clicked on the link in the newsletter.

**5. People who are authorised to access the personal data of the Concerned (which are handled by the Provider)**

The Provider and the Provider's internal coworkers are authorised to access any data, however they do not publish those nor disclose them to a third party.

In relation to operation of the underlying IT system, orders fulfillment, financial settlements the Provider may enlist the services of a data processor (eg. system operator, book keeper).

**The Provider during the course of handling personal data of the Concerned enlists the services of the following data processors in order to serve its clients at a high standard:**

Name of the data processor	Address	Activity
Clement Weaver Ltd.	5. Tapolcsányi street, Budapest 1185	accounting
OTP Bank Ltd.	21. Nádor street, Budapest 1051	account management
MKB Bank Ltd.	38. Váci street, Budapest 1056	account management
FAS Network Austria,	Schubertstraße 3, 2100 Korneuburg, Austria	Austrian accounting
Mag. Balazs Esztegar LL.M.,	Piaristengasse 41/10, 1080 Wien, Austria	Austrian lawyer
Dr. Mónika Buzsik individual lawyer	4. first floor 37/A Deák square Sopron 9400	Lawyer
Wix.com LTD,	PO box 40190 San Francisco CA United States	hosting service
Google Inc.	1600 Amphitheatre Parkway, Mountain View, CA, 94043	Google Suite service
Zoho Corp.	4141 Hacienda Drive Pleasanton California 94588	Zoho Recriut & Zoho People digital data repository
InnVoice Administrative Software Ltd.	67/B. Fehérvári road, Budapest 1119	invoicing program cloud service
Bitrix Inc. US Headquarters	901 N. Pitt St. Suite 325. Alexandria VA 22314 USA	CRM system service
Open Time Clock 2001-2018		Work time registration system

SAP Fieldglass	111 North Canal Street Suite 600 Chicago, Illinois, 60606, United States	Digital data repository (labor placement / secondment)
Workday, Inc	6230 Stoneridge Mall Rd, Pleasanton, CA 94588, USA	Digitális adattárolás (labor placement / secondment)

Should we change the range of our data processors we update the present Privacy.

## 6. Cookies and user tracking

In order to make our website more attractive and to allow use of certain functions for our clients we use so called cookies.

Cookies are small data files (cookies) that are sent to the visitor's computer through the web site by visiting the web site and saved and stored by a web browser. Most of the most frequently used web browsers (Chrome, Firefox, etc.) accept and allow the download and use of cookies by default, but it is up to the visitor to modify the browser's settings to reject or disable them or to delete the previously stored cookies from the computer

Detailed instructions for using cookies are available under the 'help menu' of each browser.

There are cookies that do not require the prior consent of the visitor. Upon the first visit at our website the users get information about those kind of cookies such as authorisation, multimedia-player, loadbalancer, cookies that support website customisation as well as the user-centered security cookies.

About cookies requiring explicit consent - if the data processing starts at the same time of visiting the website – the Provider informs the visitor and requests their consent on first visit of the website.

The Provider does not use or authorise cookies that allow third parties to collect data without the visitor's consent. Accepting the cookies is not mandatory, however the Provider may not be held responsible for website's unexpected operation when cookies are not accepted.

Cookies used by the Provider's website:

Cookie name	Life span	Purpose
svSession	Permanent	Creates activities and BI
hs	Session	Security
incap_ses_\${Proxy-ID}_\${Site-ID}	Session	Security
incap_visid_\${Proxy-ID}_\${Site-ID}	Session	Security
nlbi_{ID}	Persistent cookie	Security
XSRF-TOKEN	Persistent cookie	Security
smSession	Two weeks	Identify logged in site members

You can get more information about the cookies used by the Provider at: <https://support.wix.com/en/article/cookies-and-your-wix-site>.

Provider's website uses Google Analytics to generate reports on visitor statistics. Google Analytics also uses cookies. The information generated by cookies in connection with your use of the website is placed on a Google server, Google shortens the IP address of your Internet device.

Upon the order of the operator of the website Google evaluates the way you use the website and generates report on the website activity.

The handler of the personal data that creates the basis of the visitor statistics is Google (Google LLC). The corporate group of MATRITEL has no access to the personal data of the visitors handled by Google, only to the visitor statistics created by Google.

These visitor statistics are used for developing the services of the website of the corporate group of MATRITEL to provide better user-experience and to understand and adjust to the market conditions.

Google's guidelines on data protection: <https://policies.google.com/privacy?hl=hu>

Further information about the services of Google Analytics:

<https://www.google.com/analytics/>

You may prohibit Google from collecting and processing data generated by cookies concerning your web use. To do this, download and install the plug-in browser plug-in on the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

The Provider uses Google AdWords with the purpose of publishing ads and doing marketing activity.

Google AdWords reaches the target group by text ads, visual ads, YouTube video ads and by in-app mobile ads. People will see the Provider's ads when they search for products or services that are also offered by the Provider.

Further information about Google AdWords' services:

[https://adwords.google.com/intl/hu\\_hu/home/](https://adwords.google.com/intl/hu_hu/home/)

The Provider also uses Facebook Ads with the purpose of publishing ads and doing marketing activity.

The Facebook Ads service supports using more, different types of ads on Facebook, Instagram, Audience Network and on Messenger. For more information about the Facebook Ads' service visit: <https://www.facebook.com/business/ads-guide>

## **7. Concerned's Rights and Possibilities of Enforcement**

- May request information of the data handling (range of his/her data handled, their sources, the purpose of data handling and the legal basis, its duration, and -if this is not possible- about the aspect of defining the duration, about the data processor's name, address and activity in connection with the data processing, about the circumstances of data protection incidents, their effect and averting, and also about actions to prevent them, furthermore upon transmission of their personal data about the legal basis and the addressee) free of charge
- May request the amendment, alteration, completion of his/her personal data processed by the Provider free of charge.
- The Concerned may object to handling his/her data except for the obligatory data handling and may request the deletion or the lockup of the data free of charge.

The Provider is obliged to provide clear information in writing within 30 days from submission of requests having a subject mentioned above. Providing information is free of charge if the Concerned has not yet handed in a request for information of the same range of data during the current year.

If an application is clearly unfounded or -in particular due to its repetitive nature- excessive, the provider may charge a reasonable fee for the administrative costs of providing the information. The Provider will reimburse the fee already paid if it is found that the data has been illegally handled or the request for information has resulted in a correction

- May withdraw his/her consent given to data processing any time
- May appeal to the court
- In case of breach of data handling, you can file a complaint with the National Data Protection and Information Authority as a supervisory authority (see: <https://www.naih.hu/panaszuegyintezes-rendje.html>) or initiate a proceeding. In case

of foreign nationality, you may also apply to your supervisory authority at your place of residence.

**Supervisory Authority: National Agency for Data Protection**

Headquarters: 22/c. Erzsébet Szilágyi avenue Budapest, 1125

Mailing address: 1530 Budapest, Pf.: 5.

Telephone: +36 (1) 391-1400,

Fax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu),

Home page: <https://www.naih.hu/>

The lawsuits of data protection will be decided by court of justice. A lawsuit may be filed with the court of law according to the place of residence.

**8. Information on Data Security**

The Provider guarantees the security of the personal data by taking appropriate physical, technical and organizational / administrative measures, taking in account the state of science and technology and the costs of implementation as well as the nature, scope, circumstances and objectives of data handling and the nature and extent of the risk of varying probability and severity of natural persons' rights and freedom.

The Provider takes appropriate measures to ensure that any natural person acting under its authority and having access to personal data may only process them according to the order of the datahandler

The Provider's data security measures ensure that personal data can not be made available to an indefinite number of people without the intervention of a natural person.

The Provider as a data handler keeps record of the data handling activities under his / her responsibility, which included the information defined in Article 30 (1) of the GDPR.

### **9. Amending the Privacy Policy**

Provider reserves the right to amend this Privacy Policy, of which it informs the Concerneds appropriately. Information about processing personal data is available on website [www.matritel.eu](http://www.matritel.eu).

Sopron, 30.03.2021.



.....  
MATRITEL corporate group  
MATRITEL GmbH & MATRITEL Ltd.  
Beatrix Fodor-Kovács  
Managing Director