

## **Privacy Notice for the Recruitment Process**

This Privacy Notice has been prepared in order to provide information in accordance with the provisions of the General Data Protection Regulation (hereinafter: “**GDPR**”) on how **4iG Plc., 4iG Information Technology Ltd., V-Hálózat Távközlési Ltd. (V-Network Telecommunications Ltd.), and One Hungary Ltd.** (hereinafter: “**the Company**” or “**we**”) process your personal data in connection with and during the recruitment process.

This Privacy Notice can help you overview and understand how we process your personal data, what rights you can exercise and what legal remedies are available to you in relation thereto.

Please note that the four Companies are considered independent data controllers for the purposes of this Privacy Notice. In this Privacy Notice, we separated the individual data processing operations depending on whether they are performed by one Company or by all Companies.

### **1. The data controller and its contact details**

This table describes the information regarding each Company acting as a data controller.

| <b>Name</b>              | <b>4iG Plc.</b>                       |
|--------------------------|---------------------------------------|
| <b>Registered office</b> | 1013 Budapest, Krisztina Boulevard 39 |
| <b>Mailing address</b>   | 1013 Budapest, Krisztina Boulevard 39 |
| <b>E-mail address</b>    | hr@4ig.hu                             |

| <b>Name</b>              | <b>4iG Information Technology Ltd.</b> |
|--------------------------|--|
| <b>Registered office</b> | 1039 Budapest, Montevideo Street 2/C   |
| <b>Mailing address</b>   | 1039 Budapest, Montevideo Street 2/C   |
| <b>E-mail address</b>    | hr@4ig.hu                              |

| <b>Name</b>              | <b>V-Hálózat Távközlési Ltd.</b>  |
|--------------------------|-----------------------------------|
| <b>Registered office</b> | 1112 Budapest, Boldizsár Street 2 |
| <b>Mailing address</b>   | 1112 Budapest, Boldizsár Street 2 |
| <b>E-mail address</b>    | dpo-vinfra@one.hu                 |

| <b>Name</b>              | <b>One Hungary Ltd.</b>           |
|--------------------------|-----------------------------------|
| <b>Registered office</b> | 1112 Budapest, Boldizsár Street 2 |
| <b>Mailing address</b>   | 1112 Budapest, Boldizsár Street 2 |
| <b>E-mail address</b>    | dpo@one.hu                        |

### **2. The data protection officer and their contact details for each Company**

#### **2.1 Contact details of 4iG Plc.’s data protection officer**

|                        |                                       |
|------------------------|---------------------------------------|
| <b>Mailing address</b> | 1013 Budapest, Krisztina Boulevard 39 |
| <b>E-mail address</b>  | dpo@4ig.hu                            |

#### **2.2 Contact details of 4iG Information Technology Ltd.’s data protection officer**

|                        |                                       |
|------------------------|---------------------------------------|
| <b>Mailing address</b> | 1013 Budapest, Krisztina Boulevard 39 |
| <b>E-mail address</b>  | dpo-itsi@4ig.hu                       |

### 2.3 Contact details of V-Hálózat Távközlési Ltd.'s data protection officer

|                        |                                   |
|------------------------|-----------------------------------|
| <b>Mailing address</b> | 1112 Budapest, Boldizsár Street 2 |
| <b>E-mail address</b>  | dpo-vinfra@one.hu                 |

### 2.4 Contact details of One Hungary Ltd.'s data protection officer

|                        |                                   |
|------------------------|-----------------------------------|
| <b>Mailing address</b> | 1112 Budapest, Boldizsár Street 2 |
| <b>E-mail address</b>  | dpo@one.hu                        |

### 3. For what purpose(s) and on what legal basis do we process personal data?

#### **Data processing carried out exclusively by 4iG Plc.**

*Below you will find information about data processing operations that are carried out exclusively by 4iG Plc.*

|   |   |
|---|---|
| <b>3.1 Providing the recruitment system</b> | Data processing is carried out in order to provide the registration platform necessary for applying for job vacancies advertised in the recruitment system and to enable the submission of applications through the system. |
|   | The legal basis of processing personal data is legitimate interest pursuant to Article 6(1)(f) of the GDPR.   |
|   | Personal data will be processed for 1 year after registration.  |

We have a legitimate interest in developing a recruitment system that allows for the advertising of job vacancies, submitting applications for vacancies, and tracking of applications in an organised manner.

In connection with the above data processing, we have carried out the necessary balancing test in order to establish whether a legitimate interest exists. If you need further information regarding the results of the balancing test, please contact us at the **contact details provided in section 2.1.**

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#### **Data processing carried out by all Companies**

*Below you will find information about data processing operations that are carried out by all companies listed in section 1.*

|   |   |
|---|---|
| <b>3.2 Conducting the recruitment process</b> | The data is processed in order to implement the recruitment process for the job vacancies we advertise, as a result of which we can make a job offer to the candidate most suitable for the given position at the end of the recruitment process. |
|   | The legal basis of data processing is "contractual legal basis" pursuant to Article 6 (1) (b) of the GDPR, because data processing is necessary for taking the action requested by the data subject before the conclusion of the contract.        |
|   | Personal data will be processed until the advertised position is finally filled but no longer than 1 year from the date of the job advertisement.   |

In connection with the data processing specified in section 3.2, we inform you that we need the data provided during the recruitment process in order to make an offer to conclude an employment contract with

you at the end of the recruitment process initiated by you (if we decide to select you as a result of the recruitment process). Please note that if you do not disclose this data to us, we will not be able to conclude a contract with you.

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| <p><b>3.3 Conducting background checks</b></p> | <p>We process your personal data in order to conduct a due diligence process as part of the recruitment process in order to identify:</p> <ul style="list-style-type: none"> <li>- whether your employment pose a corruption risk to us,</li> <li>- to determine whether your employment would comply with the standard compliance requirements applicable to us (in particular the MSZ ISO 27001 and MSZ ISO 37001 standards),</li> <li>- whether there may be an economic or legal conflict of interest that could harm or endanger our legitimate interests.</li> </ul> <p>As a result of the check, a decision is made as to whether the future employment of the person concerned may pose a risk from our point of view.</p> <p>Based on the CV you provide us, we process data <b>originating from public sources</b> that is relevant to the job. Thus, the following sources are used for background checks:</p> <ul style="list-style-type: none"> <li>- <b>Business information:</b> Data included in certified public company information databases, information on senior executives and ownership status.</li> <li>- Data contained in your publicly accessible profile on <b>social media sites</b> (Facebook, LinkedIn, etc.).</li> <li>- Results obtained from searches conducted on popular <b>Internet search engines</b>.</li> <li>- <b>Other public information available online to anyone.</b></li> </ul> <p>The legal basis of processing personal data is legitimate interest pursuant to Article 6(1)(f) of the GDPR.</p> <p>Personal data will be processed until the recruitment process is completed, i.e. until the offer or a negative decision is made.</p> |
|--|--|

Our legitimate interest is to be able to comply with the anti-corruption and information security due diligence requirements required by ISO standards, thereby ensuring that the employment of the recruited person does not pose a risk to our operations.

In connection with the above data processing, we have carried out the necessary balancing test in order to establish whether a legitimate interest exists. If you need further information regarding the results of the balancing test, please contact us at the contact details provided in section 2.

**4. Who has access to your personal data? Who are the recipients of personal data?**

The Company's employees have access to your personal data on a "need-to-know" basis, meaning that only those employees have access to your personal data and only to such extent which is absolutely necessary for them to perform their duties.

**4.1 What data processors do we use?**

### Data processors used by all Companies

Below we describe the data processors that are used by all Companies.

In order to achieve the above goals, the table below describes the service providers we use as data processors. These service providers carry out certain data processing activities on our behalf and for our benefit.

| Data processor                       | Registered office of the data processor                                | Activity carried out by the data processor on our behalf                               |
|--------------------------------------|--|--|
| SAP Hungary Ltd.                     | 1031 Budapest, Záhony Street 7, Graphisoft Park                        | Cloud-based service for the SAP Successfactors Recruiting application                  |
| Microsoft Ireland Operations Limited | D18 P521, Ireland, Dublin 18, Leopardstown, South County Business Park | Providing the O365 email system and the Microsoft Teams platform                       |
| BCS Consulting Services Ltd.         | Budapest, Rétköz Street 5, 11 18                                       | Troubleshooting and operational support for the SAP Successfactors Recruiting software |

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### Other data processors used by 4iG Information Technology Ltd., One Hungary Ltd., and V-Hálózat Távközlési Ltd.

Please note that if your recruitment process is conducted by 4iG Information Technology Ltd., V-Hálózat Távközlési Ltd., or One Hungary Ltd., then we will also use 4iG Plc. as a data processor to conduct the recruitment process and perform background checks.

| Data processor | Registered office of the data processor | Activity carried out by the data processor on our behalf   |
|----------------|---|--|
| 4iG Plc.       | 1013 Budapest, Krisztina Boulevard 39   | Conducting the recruitment process (as per section 3.2) and background checks (as per section 3.3) |

#### 4.2 To which third parties, bodies and organisations may we transfer your personal data?

In addition to what is described above, we will only make your personal data available to third parties if this is necessary for the fulfilment of a legal obligation or if an authority requests disclosure of the data.

If we process your data for the purpose of establishing, defending or pursuing legal claims, we may transfer your personal data to the authority or court proceeding with the case.

#### 5. Do we transfer your data to a third country (outside the European Economic Area)?

Your personal data may be transferred by Microsoft Ireland Ltd., the provider of the Office 365 email system and Microsoft Teams platform, as a data processor, to the United States or any other country where Microsoft Corporation, its subsidiaries or additional processors operate. The data transfer will be carried out by Microsoft Ireland Ltd. in accordance with Chapter V of the GDPR.

Microsoft Corporation is listed under the European Union-United States Privacy Shield Framework which ensures an adequate level of protection of personal data according to the European Commission Implementing Regulation of 10 July 2023. Data transfers to countries outside the United States are subject to the general data protection requirements in Article 46 of the GDPR.

## 6. Automated decision-making, including profiling

No automated decision-making or profiling will be carried out with regard to your personal data.

## 7. Your data protection rights

We inform you that you can exercise your rights under the GDPR at any time by submitting a request – verbally, in writing or electronically – through any of the contact details provided by us.

Your data protection rights are summarised below.

**7.1 Right of access:** You have the right to request confirmation from us as to whether we are processing your personal data. If we process your personal data, you have the right to know what data we process about you and under what circumstances we record the same.

You also have the right to request a copy of your personal data. In this case, a copy of your personal data may be made available to you in a widely used, machine-readable format (PDF/XML) or in a printed version on paper. Requesting a copy is free of charge, however, we may charge a reasonable fee for additional copies.

**7.2 Withdrawal of consent:** You have the right to withdraw your consent given to us at any time without giving reasons. However, the withdrawal does not affect the lawfulness of data processing that was carried out before such withdrawal. After the withdrawal of your consent, we will no longer carry out operations on the personal data concerned, and they will be erased/anonymised.

**7.3 Right to rectification:** You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have any incomplete personal data completed. As long as the data cannot be clarified or supplemented, and unless additional information is provided, we will restrict the processing of your personal data and temporarily suspend all operations on it, with the exception of storage.

**7.4 Right to erasure:** You have the right to request the erasure of personal data concerning you if we no longer need it or if you have concerns about the lawfulness of the processing of your personal data. If there is an obligation to erase the processed personal data, we will cease processing the data and erase/anonymise the same.

**7.5 Right to restrict processing:** You have the right to request, in certain cases, the restriction of the processing of your personal data if you have concerns about the lawfulness of the processing or if we no longer need the data, but you need it for establishing, exercising or defending legal claims. During the restriction period, we will not perform any operations on your personal data, except for storage.

Where processing of personal data has been restricted, we can process your data only with your consent or for establishing, exercising or defending legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

**7.6 Right to data portability:** You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller where the processing of your personal data is based on your consent or for fulfilling a contractual obligation and processing is done in an

automated manner. In this case, we will provide the personal data in a structured, commonly used, machine-readable format. Exercising this right does not automatically result in the erasure of personal data from our systems.

**7.7 Right to object: You have the right to object, at any time, to your data being processed for the following purposes, on grounds relating to your particular situation:**

**Providing the recruitment system,  
Performing background checks.**

**In this case, we shall no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. If it is justified to exercise your right to object, we shall no longer process your personal data for the purposes affected by the objection. In this case your personal data will be erased / anonymised.**

## **8. Filing a complaint to the supervisory authority**

If we have processed your personal data inappropriately, contrary to the applicable laws, or if we have not complied with your request to exercise your rights, or have not complied with it properly, you have the right to file a complaint with the data protection supervisory authority at the following contact details:

|                          |  |
|--------------------------|--|
| <b>Name</b>              | National Authority for Data Protection and Freedom of Information (NAIH) |
| <b>Registered office</b> | 1055 Budapest, Falk Miksa Street 9-11                                    |
| <b>Mailing address</b>   | 1363 Budapest, P.O.B.: 9   |
| <b>E-mail</b>            | <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>     |
| <b>Phone</b>             | +36 (30) 683-5969, +36 (30) 549-6838, +36 (1) 391-1400                   |
| <b>Facsimile</b>         | +36 (1) 391-1410   |