

Privacy Notice

for candidates applying for human resource management services

IDBC Creative Solutions Kft. and **IDBC New Tech Kft.** are engaged in the search, recruitment, selection and placement of professionals (candidates) who are seeking, or are interested in, employment or engagement opportunities, as well as in presenting job or engagement opportunities and forwarding them to candidates – that is, in providing human resource management services. Given that the target groups and business partners of the two companies differ, while the provision of human resource management services generally follows the same methodology, the two companies have entered into a joint controller agreement.

The essence of the joint controller agreement is that IDBC Creative Solutions Kft. and IDBC New Tech Kft. (hereinafter jointly: **IDBC or Controller**) jointly perform and operate the provision of human resource management services (recruitment) and its operation (sales, client relations, employment, database management). The preparation and up-to-date maintenance of this Privacy Notice, the handling of any data protection incidents and, where necessary, their notification to the data protection supervisory authority, as well as the exercise of data subjects' rights, are carried out with the involvement of IDBC Creative Solutions Kft. Where any data-protection-related activity (e.g. amendment of the Privacy Notice, communication with data subjects) affects the activities of IDBC New Tech Kft., IDBC Creative Solutions Kft. acts as agreed with IDBC New Tech Kft.

The protection of your personal data is important to us; therefore, in this Privacy Notice we describe what personal data IDBC processes during recruitment, selection and placement, for what purpose and on what legal basis, and what organisational and technical measures it takes to ensure compliance with data protection rules.

IDBC's marketing activities (webinars, promotion, market research, social media, website cookies, etc.) may involve the processing of personal data; our related privacy notice can be found here: <https://idbc.hu/adatvedelem/>

Our privacy notice on the processing of personal data in connection with establishing contact with business partners, cooperating with our existing business partners, and IDBC's business activities in general can be found here: <https://idbc.hu/adatvedelem/>

Persons working for IDBC (including our subcontractors) receive the notice on the processing of their personal data before signing their employment contract or subcontractor agreement.

Use of IDBC's human resource management services is subject to the condition that this Privacy Notice has been reviewed, whether the candidate comes into contact with IDBC directly or through an intermediary (a job advertiser, a recruitment agency, or on the recommendation of a natural person).

Legal entity job advertisers or recruitment agencies qualify as controllers, and IDBC considers that their processing of personal data is lawful and compliant with data protection legislation, and therefore they provide the candidate with all information relating to the processing (including any transfer) of data. For further details on the use of intermediaries, see also Section 3.2.

Regarding personal data received on the recommendation of, or referral by, a natural person (e.g. a CV, a LinkedIn profile), **IDBC assumes that the candidate is aware of the referral to IDBC**, and that, before their application data (e.g. CV, professional information, contact details) were handed over to the referrer, **the candidate had already reviewed this Privacy Notice**.

Data protection legislation refers to natural persons as “data subjects”; therefore, in this Privacy Notice, we also use this term alongside or instead of “candidate”.

The following are further useful concepts relating to the processing and protection of personal data used in this notice:

- a) personal data: any information relating to an identified or identifiable data subject,
- b) processing: any operation performed on personal data (collection, recording, storage, processing, retrieval, disclosure, querying, access, publication, etc.);
- c) controller: the entity that determines the purposes and means of the processing of personal data,
- d) processor: a person who does not belong to the controller but who, under a written agreement, participates in processing operations,
- e) third party: a person other than the data subject, the controller and the processor (e.g. an entity publishing a job advertisement).

This Privacy Notice also contains the data protection and remedy rights afforded to natural persons.

1. Identity and contact details of the Controller

Controller 1: IDBC Creative Solutions Kft.

Registered seat and postal address: 1138 Budapest, Népfürdő u. 22., Duna Tower Office Building, Tower A, 13th floor

Company registration number: 01-09-192925

Registering authority: Company Registry Court of the Budapest-Capital Regional Court

Private employment agency licence number: BPM/0701/597-1/2016-1012

Tax number: 24983332-2-41

E-mail address: info@idbc.hu

Phone number: +36 30 479 8090

Website: <https://idbc.hu>

Data Protection Officer's contact details: adatvedelem@idbc.hu

Controller 2: IDBC New Tech Kft.

Registered seat and postal address: 1138 Budapest, Népfürdő u. 22., Duna Tower Office Building, Tower A, 13th floor

Registering authority: Company Registry Court of the Budapest-Capital Regional Court

Company registration number: 01-09-861417

Tax number: 13556075-2-41

E-mail address: info@idbc.hu

Phone number: +36 30 479 8090

Data Protection Officer's contact details: adatvedelem@idbc.hu

2. Key legislation applicable to the processing

- a) 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 (GDPR or General Data Protection Regulation)
- b) Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Infotv.)
- c) Act I of 2012 on the Labour Code (Mt.)
- d) Act V of 2013 on the Civil Code (Ptk.)

3. Activities involving the processing of personal data

3.1. Application for human resource management services and initiation of contact by the candidate

If the candidate contacts IDBC via IDBC's website, the sub-page containing job advertisements, or any published contact channel of IDBC (e.g. LinkedIn), or in response to a job advertisement published by IDBC, and provides their personal data (e.g. name, e-mail address, CV), we consider that the candidate has initiated the use of IDBC's human resource management services.

IDBC keeps records of the information provided by candidates during the initial contact.

Purpose of processing: identification of the candidate, presenting the job application or engagement opportunity to the candidate, maintaining contact

Categories of personal data processed: name, contact details (e-mail address, telephone number), information provided in the CV (e.g. data on expertise and work experience), job-search preferences, and any other information provided by the data subject (e.g. cover letter)

Legal basis for processing: Article 6(1)(a) GDPR – the consent of the data subject, given by applying for the job or engagement opportunity or for placement

Duration of processing of personal data: until withdrawal of the data subject's consent

3.2. Initiation of contact for human resource management services by IDBC

Contact with the candidate may also be initiated by IDBC, and the job or engagement opportunity may arise either at IDBC or at one of its business partners. The candidate's personal data (e.g. their CV) may be forwarded by a natural person (e.g. an employee referral) or a legal entity (e.g. a job-posting portal).

IDBC considers that the accessibility of the candidate's personal data (e.g. the transfer of their CV or its upload to a job-placement portal) means that the candidate is also aware of its transfer, and therefore the candidate accepts being contacted by IDBC.

IDBC currently cooperates with the following legal-entity intermediaries:

a) Profession.hu (registered seat: 1123 Budapest, Nagyenyed utca 8-14., company registration number: 01-09-199015, private employment agency registration number: BPM/01/15807-3/2015-1003), whose privacy notice can be read here: [GDPR Profession](#)

b) LinkedIn (registered seat: 1000 W Maude, Sunnyvale, CA 94085, US), whose privacy policy can be read here: [LinkedIn Privacy Policy](#)

IDBC occasionally also receives personal data relating to candidates from other recruitment agencies that cannot be determined in advance due to their ad hoc nature. During the initial contact, IDBC provides information on the source from which it obtained the candidate's personal data (e.g. name, telephone number).

Purpose of processing: identification of the candidate, provision of human resource management services, presenting the job application or engagement opportunity to the candidate, maintaining contact

Categories of personal data processed: name, contact details (e-mail address, telephone number), information provided in the CV (e.g. data on expertise and work experience), job-search preferences

Legal basis for processing: Article 6(1)(f) GDPR – IDBC's legitimate interest in identifying candidates and continuing its human resource management activities

Duration of processing of personal data:

a) until the data subject grants their consent to processing, or, in the absence thereof, 30 days from the acquisition of the data

b) if, during the initial contact, the candidate indicates that they do not wish to use the human resource management service or do not wish to receive information from IDBC about job applications or engagement opportunities, 5 working days from the date IDBC is informed of the rejection of its services

3.3. Processing of personal data related to the selection procedure

The selection procedure includes all activities carried out by IDBC after receipt of the personal data and the initial contact with the candidate, for the purpose of placing the candidate (e.g. conducting the interview, weighing selection criteria, transferring the candidate's data to a prospective employer). The selection procedure qualifies as a contractual-type relationship between the candidate and IDBC.

As part of the selection procedure, the interview held with the candidate takes place using the Microsoft Teams application. If the candidate consents at the start of the interview, IDBC's employee starts the Microsoft Teams transcription feature, and a computer-generated, verbatim written record is made of what is said during the interview (further information on the Microsoft Teams transcript feature is available here: <https://support.microsoft.com/hu-hu/teams/meetings/start-stop-and-download-live-transcripts-in-microsoft-teams-meetings>). Participation in the interview is not conditional on consenting to the use of the Microsoft Teams transcription feature. IDBC's employee reviews the Microsoft Teams transcript and corrects it where necessary. If the data subject does not consent to activating the transcription feature, IDBC's employee takes manual notes of what is said during the interview.

After the interview, IDBC's in-house developed program summarises the information contained in the candidate's CV and in the transcript into a predefined template. The predefined template contains data relating to professional background, foreign language skills, reason for changing jobs, place of residence and preferences regarding remote work, motivation, technical knowledge, as well as the projects and other information necessary for filling the position. Before the template completed by IDBC's in-house developed program is forwarded to the prospective employer, it is reviewed and, where necessary, corrected by IDBC's employee.

IDBC's in-house developed program, which completes the predefined template, is based on the Claude Haiku and Claude Sonnet models. IDBC's in-house developed program does not carry out internet searches, pre-screening, evaluation, scoring, ranking, job matching, background checks or similar activities, and it does not draw conclusions from the information, does not make recommendations and does not make decisions based on the data; it merely summarises the available information in a consistent format (in the predefined template).

Neither Microsoft Teams nor Claude Haiku or Claude Sonnet perform image processing, personality analysis or information evaluation; they merely support IDBC's administrative tasks (note-taking, preparing summaries).

Purpose of processing: performance of human resource management services, management of the candidate's personal data and preferences relating to the search for a job or engagement opportunity, identifying and presenting job or engagement opportunities, conducting the selection procedure (e.g. interviews), transferring personal data to a prospective employer, maintaining contact with the candidate

Categories of personal data processed: the candidate's identification data (name, place and date of birth, mother's name), contact details (telephone number, e-mail address, mailing address and/or home address), data relating to their expertise and work experience (educational qualifications, previous employers, positions held, etc.), and preferences relating to the job or engagement opportunity (e.g. remote work, fixed-term engagement)

In addition to the categories of data listed above, IDBC processes all personal data that the candidate provides in connection with the human resource management services (including, for example, recruitment and the selection procedure) (e.g. statements made by the candidate during the interview, the candidate's publicly available social media profile, interests, the content of the cover letter, the fact that the Privacy Notice has been reviewed).

Legal basis for processing: Article 6(1)(b) GDPR – performance of a contract

Duration of processing of personal data: 5 years from termination of the contract (the general limitation period under the Civil Code)

Termination of the contract also includes cases where the candidate requests the deletion of their data from IDBC's database.

3.4. Newsletter, market research or public opinion polling

In addition to communication relating to the human resource management service, IDBC regularly (a few times a year) sends newsletters to, or contacts by telephone, the candidate at the contact details provided (e-mail address, telephone number), informing them of news and developments related to its business activities, information about upcoming events (e.g. topic, date), as well as reports and interesting facts about past events, and may occasionally conduct telephone or written public opinion or market research on a topic of general interest, etc.

Based on the information available to it (e.g. job role, area of interest) or conclusions drawn therefrom, IDBC carries out profiling (grouping according to certain characteristics) from time to time, and may send specific messages or thematic newsletters to different target groups, or carry out business, business-development, market research or opinion-polling activities (e.g. surveying candidates on human resource topics of interest to them).

Subscription to the newsletter takes place at the same time as acceptance of this Privacy Notice, registration for an online event (Section 3.1), or a request for an e-book.

Subscribing to the newsletter is not a condition for using IDBC's services; therefore, the candidate may unsubscribe from the newsletter at any time via the link contained in it. IDBC continues to perform the human resource management service undertaken towards the candidate even after they unsubscribe from the newsletter.

It is also possible to unsubscribe from the newsletter by sending a request to adatvedelem@idbc.hu. After unsubscribing from the newsletter, the data subject will no longer receive notifications about IDBC's latest offers, trends and developments in its field of activity, professional information, or reports on past online events, and will no longer take part in any market research or opinion polling.

Legal basis for processing: Article 6(1)(a) GDPR – the consent of the data subject

Duration of processing: until withdrawal of the data subject's consent (see also Sections 8.3 and 8.4), or, in the absence thereof, 1 year from the last contact (e.g. newsletter)

3.5. Processing related to the exercise of the data subject's rights and to complaints concerning the processing of personal data

In connection with all processing activities carried out by IDBC, the data subject may exercise the rights set out in Section 8, may submit a complaint to the Controller regarding the processing of their personal data, or may exercise the remedies described in Section 9. In a submission concerning the exercise of a data subject's right, it is advisable to indicate the contact details (e.g.

e-mail address or postal address) to which the data subject wishes to receive our response concerning the exercise of that right.

We respond to a submission concerning the exercise of a data subject's right within a maximum of 30 days of receipt.

If a request to exercise a data subject's right does not contain sufficient information for exercising that right or for identifying the data subject, IDBC will request that the missing information be supplied.

The rights of data subjects are personal rights, which may only be exercised in person. The expression “exercised in person” means that these rights may only be exercised by the person to whom the personal data or the data protection complaint relating to the exercise of that right relates; IDBC may therefore request proof of identity from the person exercising a data subject's right.

The candidate's identification data (name, place and date of birth, mother's name) will only be processed in full where the data subject's right cannot be exercised, or the complaint concerning the processing cannot be assessed, without providing such data.

Information that IDBC is able to verify in its own records (e.g. e-mail address, telephone number) is suitable for verifying identity. Sending a copy of any official document electronically or by post is not suitable for verifying identity; IDBC will return any such correspondence to the sender or will delete/destroy it. It may occur that, in the absence of sufficient personal data required for identification, we ask the data subject questions that only they would be able to answer, in order to establish their identity.

If the data subject does not provide, or does not adequately provide, the information required for exercising a data subject's right (e.g. does not provide their name or other identifying data), we are unable to ensure the exercise of that right and will refuse to comply with the request.

If the exercise of a data subject's right or a data protection complaint adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse compliance with the data subject's request, to the extent necessary and proportionate, or to provide a response of limited content.

Purpose of processing: ensuring the exercise of data subjects' rights, handling data protection complaints (receipt, assessment, etc.)

Categories of personal data processed: the data subject's identification data (name, place and date of birth, mother's name), contact details (e-mail address, telephone number, home/postal address), and data relating to the exercise of the data subject's right (subject matter, date, and data relating to compliance)

Legal basis for processing: Article 6(1)(c) GDPR – compliance with the legal obligation under Article 12(5) and (6), Articles 15–18 and Article 21 of the GDPR

Duration of processing of personal data: 5 years from the closure of the exercise of the data subject's right (the general limitation period)

If the exercise of the data subject's rights or the handling of a data protection complaint leads to administrative or judicial proceedings, the duration of processing under this point shall last until the expiry of the retention period applicable to the documents of those proceedings.

3.6. Enforcement of legal claims

IDBC may enforce its legal claims (e.g. claims for damages) relating to its human resource management services.

Purpose of processing: enforcement of claims relating to the performance of the contract

Categories of personal data processed: name, contact details (e.g. e-mail address, telephone number), information relating to the legal claim (e.g. designation and content of the claim, date)

Legal basis for processing: Article 6(1)(f) GDPR – IDBC's legitimate interest in enforcing legal claims arising in connection with the provision of its human resource management services

Duration of processing of personal data: 5 years from the final conclusion of the proceedings relating to the enforcement of the legal claim (the general limitation period)

4. Data transfer

IDBC transfers the candidate's personal data only in accordance with prior consultation with the candidate, to all those who have, or may find, a job or engagement opportunity that is of interest to the candidate.

Beyond this, IDBC discloses the personal data it processes to a third party (e.g. an authority, court or other state body) only for a purpose and in a manner determined by law.

IDBC may, on occasion, transfer personal data for proceedings before the National Authority for Data Protection and Freedom of Information, which performs data protection supervision, or before another authority or court.

5. Profiling and automated decision-making

From among the personal data it processes, IDBC occasionally carries out profiling (grouping according to certain characteristics) based on conclusions drawn from the candidate's qualifications, interests and job role, which it uses to determine the target audience for thematic newsletters.

In connection with, or on the basis of, profiling, IDBC does not apply automated decision-making (a decision based solely on automated processing that affects the data subject).

6. Processing by processors

Processors may not make decisions relating to processing (e.g. for what purpose, which personal data are processed, for how long); they are only entitled to act in accordance with the contract concluded with IDBC and the instructions received, and to carry out specific processing operations (e.g. collection, analysis, transfer, deletion). IDBC only engages processors that implement appropriate technical and organisational measures to guarantee a level of data protection and data security appropriate to the degree of risk.

IDBC processes candidates' personal data electronically, using the Zoho Recruit module (Hiring software | Automated hiring platform - Zoho Recruit) for this purpose. Further details on Zoho's data protection and data security principles can be read here (Zoho - Data Privacy and our stand against surveillance.), and its privacy notice can be read here (GDPR Guide | Free e-book - Zoho Recruit).

IDBC uses, under a business subscription, Microsoft Ireland Operations Limited's (registered seat: Ireland, Dublin 18, Leopardstown, South County Business Park, One Microsoft Place; privacy notice: <https://privacy.microsoft.com/hu-hu/privacystatement>) Microsoft 365 and Microsoft Teams services.

In connection with the services provided by Microsoft, it is possible that Microsoft Ireland Operations Limited, acting as processor, transfers personal data to a third country (e.g. the United States of America) to its affiliated companies operating at Microsoft's registered seat or place of business. This data transfer takes place in accordance with Chapter V of the GDPR: on the one hand, Microsoft acts using the standard contractual clauses adopted by the European Commission, together with additional technical and organisational measures, and on the other hand, Microsoft is listed under the EU-U.S. Data Privacy Framework¹, a fact which, under the European Commission's Implementing Decision of 10 July 2023, ensures an adequate level of protection for personal data.

IDBC uses, under a business subscription, Anthropic Ireland Limited's (registered seat: 6th Floor, South Bank House, Barrow Street, Dublin 4, D04 TR29, Ireland) Claude Haiku and Claude Sonnet services, accessed via the Claude API. The general terms and conditions can be read here: <https://www.anthropic.com/legal/commercial-terms>, and the data processing addendum can be read here: <https://www.anthropic.com/legal/data-processing-addendum>.

¹ Data Privacy Framework

7. Data security

IDBC takes technical, organisational and personnel measures to ensure that the personal data it processes are protected against, among other things, unauthorised access, unauthorised alteration and destruction.

Access to personal data stored in the IT system is role-based and logged, meaning that it is always possible to verify who accessed which personal data and when. Only IDBC's authorised and trained employees have access to the personal data processed, and only to the extent necessary for the performance of their job duties.

8. Data subjects' rights in connection with the processing

8.1. Right to request information (right of access)

The data subject may, in writing, via the contact details provided in Section 1, request information from IDBC on which of their personal data are processed, on what legal basis, for what processing purpose, from what source, and for how long, as well as to whom, when and on the basis of which legislation the Controller has granted access to, or to whom it has transferred, which of the data subject's personal data.

IDBC complies with the data subject's request within a maximum of one month, by a reply sent to the contact details provided by the data subject.

Where the data subject requests such information in multiple copies, the Controller is entitled to charge a reasonable fee, commensurate with the administrative costs of producing the additional copies.

If the data subject's right of access under this point adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse compliance with the data subject's request to the extent necessary and proportionate.

Before complying with the request, IDBC may ask the data subject to clarify the content of the request and to specify precisely the information or processing activities requested.

8.2. Right to rectification

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC amend any of their personal data (for example, they may change their e-mail address or other contact details at any time) or complete any incomplete personal data.

The Controller complies with the request within a maximum of one month and notifies the data subject thereof by letter sent to the contact details provided by them.

IDBC informs those to whom it has transferred the data subject's personal data of the rectified data, provided that doing so is not impossible or does not require disproportionate effort on the part of the Controller.

8.3. Right to data portability

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC provide, in a structured, commonly used, machine-readable format, the personal data processed on the basis of the data subject's consent [Article 6(1)(a) GDPR] or performance of a contract [Article 6(1)(b) GDPR] and by automated means.

Where technically feasible, IDBC will, at the data subject's request, transmit the personal data directly to another controller designated in the data subject's request.

The right to data portability under this point does not create an obligation for controllers to adopt or maintain technically compatible information systems or applications with one another.

If the data subject's right to data portability adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse compliance with the data subject's request to the necessary extent.

8.3. Right to withdraw consent to processing

The data subject may, via the contact details provided in Section 1, in the same manner as consent was given (e.g. by unsubscribing if they had subscribed, or by removing a tick if they had ticked a box), withdraw their consent to processing at any time; this shall not affect the lawfulness of processing based on consent prior to its withdrawal. Withdrawal of consent to processing results in the deletion of the personal data.

8.4. Right to erasure

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC erase all or some of their personal data. IDBC will not comply with the erasure request if legislation obliges it to continue storing the personal data and the retention period specified in that legislation has not yet expired.

If there is no such obligation, IDBC will process the data subject's request within a maximum of one month and will notify the data subject of the outcome by letter sent to the contact details provided by them.

IDBC informs those to whom it has previously transferred the data subject's personal data of the erasure of the data, provided that doing so is not impossible or does not require disproportionate effort on the part of the Controller.

8.5. Right to restriction of processing (blocking)

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC restrict their personal data. Restriction is carried out by clearly marking the restricted nature of the processing and storing the data separately from other data. This means that no processing operation other than storage may be carried out on the data. The restriction lasts for as long as the reason indicated by the data subject makes it necessary to keep the personal data under restricted storage. A data subject may, for example, request restriction of their personal data if they believe that IDBC has processed their personal data unlawfully, but administrative or judicial proceedings initiated by them require that the Controller not erase the personal data. In such a case, IDBC keeps the personal data under restriction until the authority or court has been approached, and, following the conclusion of the administrative proceedings, either erases the data or continues processing it.

8.6. Right to object

The data subject may, in writing, via the contact details provided in Section 1, object to processing where it is necessary for processing based on IDBC's legitimate interests, unless IDBC demonstrates that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject, or which relate to the establishment, exercise or defence of legal claims.

IDBC examines the data subject's objection within a maximum of one month and notifies the data subject of the outcome (including, where applicable, a communication regarding the deletion of any unlawfully processed personal data) by letter sent to the contact details provided by them.

9. Means of enforcing rights and remedies in connection with the processing

The data subject may contact IDBC via the contact details indicated in Section 1 in order to enforce their rights relating to the processing and protection of their personal data.

If the data subject believes that their rights relating to the protection of their personal data have been infringed, they may seek a remedy from the following authority:

National Authority for Data Protection and Freedom of Information (NAIH)

registered seat: 1055 Budapest, Falk Miksa u. 9-11.

postal address: 1363 Budapest, P.O. Box 9.

telephone: +36 (1) 391-1400

website: www.naih.hu

e-mail: ugyfelszolgalat@naih.hu

If the data subject experiences unlawful processing of their personal data, they may initiate court proceedings (a civil action) against the Controller. Jurisdiction to hear the action lies with the regional court (törvényszék). At the data subject's choice, the action may also be brought before the regional court having jurisdiction over the data subject's place of residence (the contact details of the regional courts can be viewed via the following link: <https://birosag.hu/torvenyszekek>)

10. Updating and availability of the Privacy Notice

IDBC reserves the right to unilaterally amend this Privacy Notice.

This Privacy Notice may be amended in particular where necessary due to a change in legislation, the practice of the data protection supervisory authority, business needs, or a newly identified security risk.