



## WHC DATA PROTECTION NOTICE

### Tartalomjegyzék

1. Purpose of This Notice .....	3
2. Who We Are .....	4
3. Website Operator and Data Controller of Personal Data Provided or Collected Through Website Use.....	4
4. WHC Contact Information.....	6
5. What Personnel Recruitment and Selection-Related Data Processing Activities Does WHC Conduct? .....	6
6. Our Guiding Principles .....	6
7. CONTACT ESTABLISHMENT.....	7
7.1. Requesting a Callback? .....	7
7.2. On What Channels Can I Contact WHC? .....	7
7.3. Have You Contacted Us via LinkedIn? .....	8
7.4. Referral Program .....	8
8. APPLICATION TO JOB ADVERTISEMENTS.....	9
8.1. How to Apply for a Position? How Long Does WHC Retain Applicant Data?.....	9
8.2. What Data Is Required to Apply for a Position? .....	10
8.3. What Data Does WHC Process During the Selection Process? .....	11
8.4. What Is Name Verification? What Data Processing Does It Involve? .....	11
8.5. What Is the CVS (CV Screening) Service? .....	12
8.6. What Is Prescreening and Testing? What Is It For?.....	12
8.7. What Is Confidential Search?.....	13
8.8. How Can I Withdraw My Application? .....	13
8.9. How Can I Modify My Application Data?.....	13
8.10. What Does Newsletter Subscription Mean? What Happens if I Subscribe? ...	13
9. CANDIDATE DATABASE .....	14
9.1. Why Should I Register in the Candidate Database?.....	14
9.2. How Can I Register in the Candidate Database?.....	14
9.3. What Data Does WHC Use to Recommend Job Opportunities? .....	14
9.4. What Is Reference Verification?.....	15



9.5.	How Can I Modify My Candidate Database Data or Resume?.....	15
9.6.	How Can I Suspend My Participation in the Candidate Database? .....	15
9.7.	How Can I Request Deletion from the Candidate Database? .....	15
9.8.	How Long Are My Data Retained in the Candidate Database?.....	15
9.9.	Are You No Longer a Student but Still Approached WHC?.....	16
10.	STUDENT WORK .....	16
10.1.	What Should I Know About Data Processing Related to School Cooperative Membership?.....	16
10.2.	If I Don't Join the Cooperative, What Will Happen to My Previously Provided Data? 16	
11.	PARENTAL CARE WORK.....	17
11.1.	What Should I Know About Data Processing Related to Parental Care Cooperative Membership? .....	17
11.2.	If I Don't Join the Cooperative, What Will Happen to My Previously Provided Data? 17	
12.	RETIRED WORKER PROGRAM .....	17
12.1.	What Should I Know About Data Processing Related to Retired Worker Cooperative Membership? .....	17
12.2.	If I Don't Join the Cooperative, What Will Happen to My Previously Provided Data? 17	
13.	XIII. WHO CAN ACCESS YOUR PERSONAL DATA? .....	17
13.1.	Borrowers and Prospective Employers .....	17
13.2.	WHC Employees .....	18
13.3.	Our Data Processors.....	18
13.4.	Authorities Issuing Requests .....	19
14.	DATA SECURITY .....	19
14.1.	How Does WHC Protect Your Data? What Data Security Measures Does It Take? 19	
14.2.	What Does WHC Do in Case of a Data Protection Incident? .....	20
15.	DATA SUBJECT RIGHTS .....	20
15.1.	Right to Information and Access .....	20
15.2.	Right to Data Portability.....	21
15.3.	Right to Rectification and Supplementation.....	21



15.4.	Right to Restrict Processing .....	21
15.5.	Right to Withdraw Consent and Right to Object.....	21
15.6.	Right to Erasure .....	22
15.7.	Legal Remedies .....	22
15.8.	Exercise of Data Subject Rights .....	22
16.	DATA PROCESSING GLOSSARY AND DEFINITIONS.....	22
16.1.	What Constitutes Personal Data? .....	22
16.2.	Who Is a Data Controller? .....	22
16.3.	What Does Data Processing Mean?.....	22
16.4.	What Does Joint Data Processing Mean? .....	23
16.5.	Who Is a Data Processor?.....	23

## 1. Purpose of This Notice

Through our recruitment portal accessible on WHC websites ([www.whc.hu](http://www.whc.hu), [www.whc-group.com](http://www.whc-group.com), [www.lifeatwhc.hu](http://www.lifeatwhc.hu), hereinafter collectively referred to as the "**Website**"), WHC enables job seekers to apply for advertised positions, establish contact with us, request callbacks regarding specific job opportunities, and register their resumes in our candidate database. These operations involve the processing of personal data. In accordance with data subject rights protection and our legal obligations, WHC provides herein detailed information regarding the principal characteristics of our data processing activities. The purpose of this notice is to inform you how we process your personal data (such as email address, telephone number, resume data), including the reasons, methods, and duration of such processing.

This notice applies to all data processing operations that precede employment relationships, cooperative membership (including school cooperative, parental care cooperative, and retired worker cooperative), including in particular: applications through the WHC Website, callback requests, registration in the candidate database, customer service inquiries, and data processing related to application forms completed at WHC offices.

Information regarding data processing not mentioned herein, specifically:

- Special rules for staff leasing and other employment relationships (internal staff)
- Special rules for personnel placement services
- Data processing related to services provided within WHC
- Data processing related to business partner and customer communications
- Data processing related to newsletters
- Data processing related to Website use and cookies



- Data processing related to the WHC Vote application
- Data processing related to recruitment, selection, and staff leasing of third-country nationals, and other employment relationships
- can be found in the document titled "*Data Protection Notice for Third-Country Nationals, Employees, Partners, and Online Platform Users.*"
- Detailed rules regarding school cooperative employment-related data processing are available in the document titled "*Data Protection Notice for School Cooperative Members.*"
- Detailed rules regarding parental care cooperative employment-related data processing are available in the document titled "*Data Protection Notice for Parental Care Cooperative Members.*"
- Detailed rules regarding retired worker cooperative employment-related data processing are available in the document titled "*Data Protection Notice for Retired Worker Cooperative Members.*"

## 2. Who We Are

WHC provides personnel services through staff leasing, acts as a private employment agent by placing job seekers with employers, recruits candidates for student work, parental care cooperative work, and retired worker cooperative positions, and continually seeks appropriate personnel with diverse skill sets for various projects on behalf of its business partners and itself. WHC also includes a payroll and accounting company.

## 3. Website Operator and Data Controller of Personal Data Provided or Collected Through Website Use

The Website is jointly operated by WHC member companies (referred to herein individually and collectively as "WHC"), who thereby qualify as joint data controllers for these purposes. WHC members include staffing and placement companies as well as cooperative organizations.

### WHC Member Companies:

Company Name	Registration Number	Registered Office	Domestic Private Employment Agent License	Foreign Private Employment Agent License	Staff Leasing License	Tax ID
WHC Personnel Service Ltd.	20-09-067382 (Zalaegerszeg Regional Court)	8900 Zalaegerszeg, Ady E. u. 2.	1520-2/1999 (Zala County Government Office)	—	481-6/2002-2000 (Zala County Government Office)	13773160-2-20



WHC Recruitment Personnel Service Ltd.	20-09074898 (Zalaegerszeg Regional Court)	8900 Zalaegerszeg, Ady Endre utca 2.	ZAM/01/5171/2016 (Zala County Government Office)			21568208-2-20
WHC Employment Ltd.	20-09-076442 (Zalaegerszeg Regional Court)	8900 Zalaegerszeg, Ady Endre utca 2.	ZAM/01/000820-4/2019 (Zala County Government Office)  12026-1/2021  6320-1/2022			26670799-2-20
WHC Personal Personnel Service Ltd.	20-09-073299 (Zalaegerszeg Regional Court)	8900 Zalaegerszeg, Ady Endre utca 2.	ZAM/01/000436-8/2016  407/2013.	ZAM/01/000436-8/2016  407/2013.		24236128-2-20
WHC Holding Asset Management and Advisory Ltd.	20-09-073562 (Zalaegerszeg Regional Court)	8900 Zalaegerszeg, Ady Endre utca 2.	ZAM/01/001435-3/2023.  ZAM/01/001435-3/2023	ZAM/01/001435-3/2023.  EEA Member State 1435-3/2023  EEA Member State		24333359-2-20
WHC Payroll Accounting Ltd.	20-09-076811 (Zalaegerszeg Regional Court)	8900 Zalaegerszeg, Ady Endre utca 2.				27280731-2-20
WHC Student School Cooperative	20-02-050404 (Zala Regional Court)	8912 Nagypáli, plot no. 035/2.				23086119-2-20
WHC Senior Public Interest Retired Worker	20-02-050419 (Zala Regional Court)	8912 Nagypáli, plot no. 035/2.				28740379-2-20



Cooperative						
WHC Family Parental Care Cooperative	20-02-050421 (Zalaegerszeg Regional Court)	8912 Nagypáli, plot no. 035/2.				27452895-2-20
Job Point 2000 Ltd.	02-09069687 (Pécs Regional Court)	7622 Pécs, Liszt Ferenc utca 10. 1st floor	4749-2/2004		4750-2/2004	13364377-2-02

#### 4. WHC Contact Information

**Telephone:** +36-92/550-050

**Fax:** +36-92/550-060

**Email for data protection matters:** [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu)

**WHC Data Protection Officer:** Szabó Flóra

**Email for general inquiries:** [whc@whc.hu](mailto:whc@whc.hu)

**WHC Office Contact Details:** <https://www.whc.hu/kapcsolat>

**Data Protection Officer:** dr. Hrebenku Anikó

**Data Protection Officer Contact:** [whcdpo@clvpartners.com](mailto:whcdpo@clvpartners.com); +36 1 300 9304

#### 5. What Personnel Recruitment and Selection-Related Data Processing Activities Does WHC Conduct?

WHC's objectives include:

- Publishing job advertisements, including student work positions
- Establishing contact with job seekers
- Offering job opportunities
- Identifying candidates
- Recommending candidates to third parties (personnel placement)
- Employing candidates through staff leasing
- Creating and maintaining school cooperative, parental care cooperative, and retired worker cooperative membership relationships
- Maintaining a candidate database

#### 6. Our Guiding Principles

- We request only personal data that does not infringe upon your privacy rights and that is material to establishing, performing, or terminating an employment relationship. You determine which personal data to share with us in your resume.
- Before sharing your identifiable information with third parties, we inform you in advance and request your consent for data transfer.



- In the recruitment process, partners may require candidates to complete aptitude and suitability assessments that we administer; however, WHC does not retain, copy, or process test data. Following completion, we promptly forward test materials to the partner, who acts as an independent data controller regarding such materials.
- We prepare written records of our interviews with you and make these available for your review.
- We do not employ psychological, graphological, or polygraph testing.
- We request criminal background certificates only when justified (e.g., legal requirement or legitimate borrower interests).
- We request employer evaluations only with your prior, explicit consent.
- Regarding marketing activities, we send newsletters only with your prior, explicit consent.
- We record information relevant to assessing your qualifications and suitability for current and potential future positions.

You may withdraw your application, reconsider your decision, and request deletion from our candidate database at any time.

## 7. CONTACT ESTABLISHMENT

### 7.1. Requesting a Callback?

If you are interested in a job advertisement, you have the option to provide your name and mobile number on the Website to request that we contact you and provide a callback regarding that opportunity. (Data Processing Basis: Your consent pursuant to GDPR Article 6(1)(a)) We process your name, telephone number, and the date and time of any conversation to inform you about positions that interest you or to draw your attention to other relevant job opportunities (data processing purpose). If you subsequently lose interest in the specific position or other positions we suggest, or if you do not register in our candidate database, we will delete your telephone number within 10 days of the initial recording (data processing duration). You may request deletion of your data at any time within this 10-day period by contacting us at [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu) or through other WHC contact channels. You may also request deletion during our telephone outreach. If you do not provide a telephone number, we cannot contact you regarding job opportunities that match your interests; however, you remain free to contact us by phone, email, or in person.

### 7.2. On What Channels Can I Contact WHC?

**Telephone:** +36-92/550-050

**Fax:** +36-92/550-060

**Email:** [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu); [whc@whc.hu](mailto:whc@whc.hu)

For data protection matters (such as data modification, deletion requests, or data protection complaints), please contact us primarily at [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu). You may also contact any WHC company by mail at their registered office address.

When you contact us with questions or requests via email, postal mail, or telephone, we process your personal data to respond to your inquiry or request (data processing



purpose). We process this data on the basis of our legitimate business interest to record and respond to your inquiries and to use our correspondence for potential dispute resolution (data processing basis: GDPR Article 6(1)(f)).

Only authorized staff members have access to messages sent by mail, email, or fax. For telephone inquiries, we retain personal data only when further contact or response is necessary; in such cases, we record your telephone number and, where relevant, the date and time of the conversation.

We delete personal data handled regarding job opportunities and general inquiries (including emails) following the completion of the data processing purpose. If no further administrative action or claim resolution is anticipated, we delete the correspondence promptly. In other cases, particularly those involving potential disputes, we retain the inquiry and response until the expiration of applicable limitations periods (generally five years).

If you send your resume via email (unsolicited submission), whether to express interest in working for us or to ask us to find you a job, we will examine within 10 days whether an appropriate position is available within WHC or with our clients and contact you accordingly. If a specific position interests you, we will inform you how to apply. If we cannot suggest a suitable position, we will notify you and offer you the opportunity to register in our candidate database so we may continually recommend positions aligned with your qualifications and experience.

### **7.3. Have You Contacted Us via LinkedIn?**

If our colleague identifies you as a potential candidate based on your professional LinkedIn profile, we will reach out to you via LinkedIn message while adhering to LinkedIn's terms of service. Your resume and contact information (in accordance with LinkedIn's data protection policies) are retained in the LinkedIn system until you consent to data processing for a specific job opportunity, apply to a position via whc.hu, or register in our candidate database. The basis for this contact data processing is our legitimate interest in expanding our database and contacting potential candidates who are members of LinkedIn's professional community and have made their professional background publicly available, thereby accepting that professional recruiters may contact them via LinkedIn message (data processing basis: GDPR Article 6(1)(f)). You may revoke permission for WHC to process your LinkedIn profile data at any time in your LinkedIn settings (<https://www.linkedin.com/psettings/data-sharing>).

### **7.4. Referral Program**

If a WHC employee identifies you as a potential candidate for a position and informs you of the opportunity, you may apply directly or register in our candidate database. In this case, you provide your personal data (name, birthplace, date of birth, position of interest, contact information) by completing and submitting the standardized referral form. We use this information to contact you to complete a registration form. We then search for appropriate positions and contact you with opportunities. (Data Processing Basis: Your consent pursuant to GDPR Article 6(1)(a)) Subsequent application and selection procedures follow standard rules as detailed in Section VIII below.



## 8. APPLICATION TO JOB ADVERTISEMENTS

### 8.1. How to Apply for a Position? How Long Does WHC Retain Applicant Data?

The Website features current job postings for both student and adult employment opportunities. Applications may be submitted directly through the Website, by completing and submitting a registration form in person at WHC offices, via the Facebook Jobs application on our official Facebook page, or through other online recruitment platforms.

During the completion of the registration form, applicants are required to read and accept the Data Protection Notice available at <https://whc.hu/adatkezeles>, and subsequently declare for what purpose and for how long they consent to the processing of their personal data (legal basis for processing: Article 6(1)(a) of the GDPR). Without such consent, participation in the selection process cannot be ensured.

**Applicants may choose to limit the processing of their data solely to the specific position applied for.** In such cases, personal data will be deleted 120 days after the recruitment process for that position has concluded. Alternatively, **applicants may consent to have their personal data stored in the WHC candidate database for a period of two years to be considered for future job opportunities.** Detailed information regarding inclusion in the candidate database is available on our Website.

Applicants may also simplify the **application process by using their Facebook account** to apply. In this case, based on the applicant's consent (legal basis for processing: Article 6(1)(a) of the GDPR), WHC will receive personal data made available by Facebook Ireland Limited (name, email address, and profile photo) in accordance with Facebook's privacy policy. By clicking the "Apply" button, the application is forwarded to WHC. Upon submission, the applicant receives an automatic confirmation message.

If the applicant submits their application through the chatbot feature available on the WHC Facebook page—either for a specific position or for inclusion in the candidate database—the processing of personal data also takes place based on the applicant's consent (legal basis for processing: Article 6(1)(a) of the GDPR). In such cases, after reading and acknowledging this Data Protection Notice, the applicant may grant consent and provide the necessary personal information directly through the chatbot interface.

**For applicants under the age of 18**, the validity of consent for data processing given through the Website requires a declaration by a parent or legal guardian. The parent provides consent for the processing of the minor's personal data by signing the parental consent form. If parental consent is not granted, or if the signed parental declaration is not received by any WHC office in physical form or electronically within 10 days of sending the consent form template, the minor applicant's data will be deleted. Until the parental consent is obtained, WHC processes the minor's personal data on the basis of its



legitimate interest in acquiring such consent (legal basis for processing: Article 6(1)(f) of the GDPR). Until confirmation is received, WHC may contact the underage applicant only for the purpose of obtaining parental consent. For in-person applications, parental written consent is required for underage students both to apply for student jobs and to become members of the student cooperative.

Certain job advertisements are publicly available through the **Facebook Jobs** application. When applying via **Facebook Jobs**, the applicant consents (legal basis for processing: Article 6(1)(a) of the GDPR) to Facebook Ireland Limited transferring their name, email address, and telephone number to WHC as the advertiser, authorizes WHC to access their public Facebook profile, and allows WHC to contact them. Before granting such consent, applicants may review this Data Protection Notice and provide their explicit consent accordingly. If, for any reason, explicit acceptance of this Notice is not recorded during a Facebook Jobs application, WHC will contact the applicant by email and redirect them to the Website, where consent to data processing must be provided within 10 days.

If WHC receives an applicant's personal data through a channel where this Data Protection Notice has not been explicitly accepted (for example, from an external CV database), the applicant will receive an email explaining how and where to provide their consent within 10 days. Should WHC not receive the required consent within that period, the personal data will be deleted.

## **8.2. What Data Is Required to Apply for a Position?**

**Application** always requires **identification data and information enabling contact**. Relevant education, professional qualification, and experience information facilitates appropriate candidate matching. Therefore, for professional positions, we require your resume demonstrating professional competence and qualifications for the advertised role, and for general registration, resume submission is necessary. For physical positions, resume submission is optional. Based on these considerations, application data may include:

- Name (surname, given name)
- Email address
- Telephone number
- Nationality
- Highest educational qualification
- Field of study or profession
- Experience with previous employers
- Resume, which may include, at your discretion: photograph, age, professional background, competencies, interests, hobbies, etc.
- Position applied for
- For chatbot applications: conversation content

**For Student Work Applications:** To verify student status, establish cooperative membership prerequisites, maintain contact, and select appropriate positions, we collect:

- Name (surname, given name)



- Email address
- Telephone number
- Proof of reaching age 18

Optional Student Work Application Data:

- Current student status
- Student ID expiration date
- Student work schedule preferences (weekends, school breaks, during school year)
- Task type and work location preferences

Resumes may be uploaded for student work applications as well. For in-person applications, we request additional personal data for school cooperative membership preparation, detailed in the respective notice.

### **8.3. What Data Does WHC Process During the Selection Process?**

To identify, evaluate, and select appropriate candidates for advertised positions, establish candidate "ownership," and improve service quality, we process the following data in addition to that provided during application (data processing purpose), with your consent (GDPR Article 6(1)(a), including special data per Article 9(2)(a)) depending on the specific position:

- City of residence (if not previously provided)
- Education, qualification, and experience data relating to studies, training, previous positions, former employers, and employment duration
- Employer references and recommendations regarding the candidate
- Information on medical clearance requirements, if applicable
- Additional personal data provided by the candidate: salary expectations, willingness to work night shifts, geographical flexibility, etc.
- Interview notes
- Criminal background certificate (if justified)
- Previous positions applied for through WHC and their status (rejected, withdrawn, applied)
- Previous WHC employment facts, position, start and end dates
- Name, mother's name, date of birth
- For professional positions: video recording (audio and visual) from interview conclusion
- Platform or listing service where you applied

Special Data: WHC does not require submission of special data except where essential to the position. If you voluntarily provide special data (religious or philosophical conviction, health information, etc.), WHC processes it only to the extent material to establishing, performing, or terminating the employment relationship; all other data is disregarded in decision-making. (Data Processing Basis: Your consent per GDPR Article 6(1)(a); Special data per Article 9(2)(b) and (h))

### **8.4. What Is Name Verification? What Data Processing Does It Involve?**

The purpose of the name verification process is twofold. Firstly, it enables the prospective employer or client to confirm whether you have previously been employed or engaged with them, and if so, when such an employment relationship existed. Secondly, in the



course of recruitment services, it allows WHC to determine whether the client company already considers you as its own candidate — that is, whether your personal data has already been received directly from you or from a third party. In such cases, subsequent contact may primarily be established directly between you and the client.

During the name verification procedure (commonly referred to as a “name check”), WHC transfers your name and identifying information — such as your mother’s name, date of birth, or, in exceptional cases, additional identifiers expressly communicated to you in advance — to a specified client, based solely on your consent (legal basis for processing: Article 6(1)(a) of the GDPR). In the context of recruitment services, personal data transferred for name verification purposes will be retained for up to 18 months after the withdrawal of your consent, on the basis of WHC’s legitimate interest (legal basis: Article 6(1)(f) of the GDPR). This retention period serves to verify that a candidate introduced by WHC was subsequently employed by the client, which supports contractual fee settlement and substantiates WHC’s fee claim. In the context of temporary staffing services, data transferred for name verification will be deleted within 30 days following the withdrawal of your consent.

If you choose not to authorize the transfer of the necessary data for the purpose of name verification, it is possible that you may not be invited to a plant test or personal interview. Such decisions are made solely at the discretion of the hiring or contracting client. As you are informed in advance about the identity of the prospective employer or client, you may request the deletion of your personal data or object to the processing at any time, without any adverse impact on your right to privacy.

### **8.5. What Is the CVS (CV Screening) Service?**

The CV Screening service is offered to our partners. Similar to prescreening detailed in Section 6, we verify compatibility between advertised position requirements and applicant data. We transfer data of candidates meeting position criteria to our partner. (Data Processing Basis: Our legitimate interest per GDPR Article 6(1)(f))

Before transferring data, we notify the candidate by email which partner and position are involved. The candidate may object to transfer to that specific partner.

The candidate incurs no disadvantage for objecting to or not acknowledging such transfer. In addition to general acknowledgment, candidates may specify companies to which their personal data may not be transferred, thereby restricting access.

### **8.6. What Is Prescreening and Testing? What Is It For?**

During prescreening, we verify compatibility between advertised position requirements and applicant-provided information. Our objective is to identify candidates whose qualifications and experience best match available opportunities and recommend candidates best meeting position requirements to our partners.

For physical positions, we conduct testing to determine which candidate is most suitable. (Data Processing Basis: Our legitimate interest per GDPR Article 6(1)(f)) Specific test



criteria are determined by the relevant partner. We may also conduct testing using our own criteria to identify the most appropriate candidates to recommend. During testing, we communicate only the determination of suitability/unsuitability to our partner; test materials are not transferred. Exception: where we have alternative data processing arrangements with the partner, you will be informed in advance.

### **8.7. What Is Confidential Search?**

In exceptional cases where a partner requests, candidate data may be transferred as confidential search - meaning you are unaware of the specific partner receiving your data. Before transferring data, we notify you by email that transfer will occur, without naming the partner. You may object to transfer. If you object, transfer will not occur. If you do not respond or provide consent, data will be transferred following one day's passage. (Data Processing Basis: Your consent per GDPR Article 6(1)(a))

You incur no disadvantage for objecting to or not acknowledging such transfer. In addition to general acknowledgment, you may specify companies to which your personal data may not be transferred, thereby restricting access.

### **8.8. How Can I Withdraw My Application?**

If you change your mind and wish to withdraw your application, you may do so by clicking the withdrawal link in the system message you received regarding your application, or in person at any WHC office, by telephone to the WHC staff member working with you or the relevant office's main number, or by email to [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu).

Please note: if you request data deletion before selection concludes, you cannot further participate in that selection since your application materials will no longer be available. If you withdraw and do not register in our candidate database, we will delete your data within one month maximum.

### **8.9. How Can I Modify My Application Data?**

You may request data modification or supplementation in person at any WHC office or by email to [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu).

### **8.10. What Does Newsletter Subscription Mean? What Happens if I Subscribe?**

During application, you may opt to subscribe to WHC job advertisement newsletters (data processing basis: GDPR Article 6(1)(a)). Based on data you provide and generated during employment, we create a profile allowing us to send personalized job recommendations considering your education, experience, positions held, and interests. You may unsubscribe from newsletters at any time at [leiratkozask@whc-group.com](mailto:leiratkozask@whc-group.com); we will send no further newsletters.



## 9. CANDIDATE DATABASE

### 9.1. Why Should I Register in the Candidate Database?

Database registration benefits you because WHC staff can subsequently contact you regarding job opportunities matching your qualifications and experience (data processing purpose). If you prefer not to use this service, you may apply for specific positions only.

### 9.2. How Can I Register in the Candidate Database?

You may register in our candidate database in person at WHC offices or events by completing a form, through your job application on the Website by accepting a supplementary statement, or via the Website's "Resume Upload" menu by uploading your resume or providing your information. (Data Processing Basis: Your consent per GDPR Article 6(1)(a))

### 9.3. What Data Does WHC Use to Recommend Job Opportunities?

For voluntary candidate database registration, the following identification and contact information is always required:

- Name (surname, given name)
- Email address
- Telephone number
- City (if registering through the "Resume Upload" menu)

If you provide your resume and consent to being contacted for two years regarding potential opportunities, you determine which personal data to share: photograph, age, professional background, competencies, interests, hobbies, etc. - all assisting WHC in identifying appropriate candidates and matching you with suitable positions.

During your engagement and applications, we collect additional data assisting candidate and employer matching:

- Name (surname, given name)\*
- Email address\*
- City\*
- Telephone number\*
- Nationality
- Highest educational qualification
- Field of study or profession
- Previous employer experience
- Employer references and recommendations
- Resume\*
- Position applied for
- For school cooperative employment: proof of age 18, current student status, student ID expiration, student work schedule preferences, work location preferences\*
- For parental care cooperative employment: documentation that you do not receive childcare allowance or support—government decision confirming receipt of such benefits



- For retired worker cooperative employment: retired status documentation: pension or interim miner benefits determination number, date, validity, data content, payment account number
- For Facebook and LinkedIn profile imports: profile picture and all other public personal data shared on your profiles

\*Data marked with an asterisk is required.

Special Data: WHC requires no special data submission except where essential to the position. If you voluntarily provide special data (religious or philosophical conviction, health information, etc.), WHC processes it only to the extent material to establishing, performing, or terminating the employment relationship; all other data is disregarded in decision-making.

(Data Processing Basis: Your consent per GDPR Article 6(1)(a); Special data per Article 9(2)(b) and (h))

#### **9.4. What Is Reference Verification?**

With your consent, we may contact your former employers and communicate employer references and recommendations you received.

#### **9.5. How Can I Modify My Candidate Database Data or Resume?**

You may request data modification or supplementation in person at any WHC office or by email to [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu).

#### **9.6. How Can I Suspend My Participation in the Candidate Database?**

You may email [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu) requesting that we restrict data processing and temporarily not contact you regarding opportunities matching your profile. If you change your mind and wish to receive job opportunity information again, contact the same email address requesting resumption of contact.

#### **9.7. How Can I Request Deletion from the Candidate Database?**

You may request data deletion in person at any WHC office or by email to [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu).

#### **9.8. How Long Are My Data Retained in the Candidate Database?**

Two years following your database consent, your resume and application-related data are deleted. You may refresh your consent and extend database participation for another two-year period with each new job application. If you apply for another advertised position within two years but do not refresh previous consent, your data will be deleted 120 days following that search's closure.

If placed through **staff leasing**, your employee data continues to be processed according to the "*Data Protection Notice for Third-Country Nationals, Employees, Partners, and Online Platform Users.*" **For school cooperative, parental care cooperative, or retired**



**worker cooperative membership**, your data continues to be processed during membership and is deleted upon membership termination, except if you consented within the past two years to database inclusion. Data previously processed regarding school or cooperative membership continues to be processed according to the applicable cooperative membership data protection notice.

Two years before expiration, we will notify you that your two-year registration will expire and we will delete your database entry. If you wish to extend your searchability for another two years, please notify us through any of our contact channels.

### **9.9. Are You No Longer a Student but Still Approached WHC?**

WHC provides job search assistance throughout your career. We may contact you regarding adult opportunities after school cooperative membership ends if you provided separate consent. (Data Processing Basis: Your consent per GDPR Article 6(1)(a)) The same applies to parental care and retired worker cooperative members, who may be contacted regarding appropriate opportunities.

If you only inquired about specific student work and joined the school cooperative, only WHC Student Cooperative may contact you regarding student work opportunities. Similarly, if you inquired about specific parental care or retired work and joined that cooperative, only that cooperative may contact you.

If you authorize being contacted for two years (database registration), any WHC member may contact you for two years regarding adult opportunities or (for school cooperative members) positions available to students but advertised for adults. If you do not authorize database registration, we cannot contact you regarding adult opportunities; therefore, you may miss job offers.

## **10. STUDENT WORK**

### **10.1. What Should I Know About Data Processing Related to School Cooperative Membership?**

Detailed data processing information regarding school cooperative membership establishment, preceding processing steps, and membership relationship is available here.

### **10.2. If I Don't Join the Cooperative, What Will Happen to My Previously Provided Data?**

If you do not join and do not request candidate database registration, your data will be deleted 120 days following the advertised position closure.

To request earlier deletion, contact us via email at [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu), by mail to the Cooperative's address, or in person at any WHC office.



## **11. PARENTAL CARE WORK**

### **11.1. What Should I Know About Data Processing Related to Parental Care Cooperative Membership?**

Detailed data processing information regarding parental care cooperative membership establishment, preceding processing steps, and membership relationship is available here.

### **11.2. If I Don't Join the Cooperative, What Will Happen to My Previously Provided Data?**

If you do not join and do not request candidate database registration, your data will be deleted 120 days following the advertised position closure.

To request earlier deletion, contact us via email at [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu), by mail to WHC Family Parental Care Cooperative's address, or in person at any WHC office.

## **12. RETIRED WORKER PROGRAM**

### **12.1. What Should I Know About Data Processing Related to Retired Worker Cooperative Membership?**

Detailed data processing information regarding retired worker cooperative membership establishment, preceding processing steps, and membership relationship is available here.

### **12.2. If I Don't Join the Cooperative, What Will Happen to My Previously Provided Data?**

If you do not join and do not request candidate database registration, your data will be deleted 120 days following the advertised position closure.

To request earlier deletion, contact us via email at [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu), by mail to WHC Senior Public Interest Retired Worker Cooperative's address, or in person at any WHC office.

## **13. XIII. WHO CAN ACCESS YOUR PERSONAL DATA?**

### **13.1. Borrowers and Prospective Employers**

Before transferring your personal data to any prospective employer/borrower, we inform you and obtain your consent, ensuring you decide whether to genuinely pursue the opportunity, thereby preventing unwanted contact from employers where you currently work or otherwise prefer not to engage.



Upon confirming your interest, you consent to forwarding your resume or, absent a resume, necessary application information, and during name verification, previously identified data to the prospective employer/borrower for candidate evaluation purposes. The prospective employer/borrower provides data protection information according to GDPR Article 14.

### 13.2. WHC Employees

WHC staff members responsible for recruitment and employment functions have access to email inboxes receiving applications, complaints, and data protection requests, and to the whc.hu recruitment support software.

### 13.3. Our Data Processors

We engage data processors for data storage, IT services related to data carriers, and other data processing operations. Data processors act according to applicable law and WHC instructions. Our data processors and their functions include:

<b>Data Processor</b>	<b>Activity Performed</b>
<b>Netrix Informatikai Kft.</b> (1055 Budapest, Falk Miksa utca 12 fe. 2., Company ID: 01-09-706619)	Website operation, development, and maintenance; hosting; server operation
<b>ATTRECTO Zártkörűen Működő Részvénytársaság</b> (08-10-001846, 9024 Győr, Wesselényi utca 6.)	Candidate database software (physical positions, cooperative employment) operation and maintenance
<b>Cloud-IT s.r.o.</b> (Jozefská 7, 81106 Bratislava, Registration No.: SK2023554896)	Candidate database software (professional positions) operation and maintenance
<b>SMART INFORMATIKA Kft.</b> (20-09-070966, 8900 Zalaegerszeg, Berzsenyi utca 9. l. em. 10.)	IT systems administration
<b>Microsoft Ireland</b> (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland)	Email service, cloud service, survey and evaluation, CRM
<b>Hotjar Ltd.</b> (Level 2 St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta)	Statistical data generation from cursor movement and click data for product usage analysis and development



<b>evoCRM Kft.</b> (01-09-270640, 1111 Budapest, Lágymányosi utca 12. fszt. 2.)	CRM system (customer record and management) operation, development, maintenance, server services
<b>Google Ireland Ltd.</b> (Dublin 4, Barrow 00, Ireland)	Analytics services for <a href="http://www.whc.hu">www.whc.hu</a> , <a href="http://www.whc-group.com">www.whc-group.com</a> , and <a href="http://www.lifeatwhc.hu">www.lifeatwhc.hu</a>
<b>ChatBoss Korlátolt Felelősségű Társaság</b> (9021 Győr, Bajcsy-Zsilinszky utca 27. 3. em. C.; Cg.08-09-030584)	Chatbot technical implementation and software operation; maintenance and development support; records all chatbot applicant data as processor. Accesses conversation content but performs no operations on it.
<b>The Rocket Science Group, LLC</b> ( <a href="https://mailchimp.com/">https://mailchimp.com/</a> ) (675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA)	Newsletter distribution

#### 13.4. Authorities Issuing Requests

We inform you that courts, prosecutors' offices, investigating authorities, misdemeanor authorities, administrative authorities, the National Data Protection and Freedom of Information Authority, and other authorities with legal authorization may request information, data disclosure, transfer, or document provision. WHC provides personal data to authorities only to the extent specified (precise purpose and data scope) as necessary for fulfilling the request.

### 14. DATA SECURITY

#### 14.1. How Does WHC Protect Your Data? What Data Security Measures Does It Take?

To ensure the protection, confidentiality, and integrity of the personal data we process, and to prevent its destruction, unauthorized use, or alteration, WHC implements a range of IT, organizational, and other data security measures. We continuously monitor technological developments and apply technical, technological, and organizational solutions that are appropriate to the level of protection required by our data processing activities.

Personal data stored in physical form at WHC offices or in our central archive is kept securely and confidentially in an organized and locked manner. Access to personal data received via email is restricted exclusively to the employees of the relevant department or office who have authorized access rights.



We use automated data backups and firewalls to protect data integrity and authenticity and to ensure that, in the event of destruction or alteration, the original data can be restored. Secure SSL access protocols are employed to prevent unauthorized access. Password-protected access control systems and activity logging are in place to monitor and safeguard data management operations.

Personal data stored in our systems is hosted on a dedicated server located in Hungary, operated by our data processor, and protected around the clock. Access to the server room is subject to monitoring and security controls.

Our email system is provided by Microsoft Ireland (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland) through the Office 365 cloud-based service. Microsoft Ireland, as our data processor, fully complies with the data security requirements applicable within the European Union.

#### **14.2. What Does WHC Do in Case of a Data Protection Incident?**

A personal data breach is defined as any event that results in unauthorized access to personal data, or in the destruction, loss, or alteration of such data — for example, the destruction of a database or the loss of a data storage device containing personal information.

In the event of a personal data breach, WHC promptly assesses the nature, impact, and associated risks of the incident (including the type and volume of data affected, and whether restoration is possible) and immediately takes all necessary actions to mitigate or eliminate the incident's effects. If the identified risks cannot be fully mitigated, WHC reports the breach to the competent data protection supervisory authority within 72 hours of becoming aware of the incident. Where appropriate, WHC will also publish relevant information on its website. Furthermore, in compliance with applicable legal requirements, WHC maintains detailed records of all personal data breaches, documenting their nature, effects, and the corrective measures implemented.

### **15. DATA SUBJECT RIGHTS**

We consider it essential to properly ensure your rights regarding personal data processing throughout our relationship. We address the following rights: Upon any data subject inquiry regarding personal data processing, we ensure exercise of your rights within the shortest possible timeframe, but no later than one month, or if further information is necessary, we immediately contact you to process your request via email or telephone (preferably using your preferred communication method).

#### **15.1. Right to Information and Access**

You are entitled to receive confirmation from WHC whether personal data processing concerning you is underway, and if so, to access your personal data and the following information:



- a. Data processing purposes
- b. Personal data categories processed
- c. Recipients or recipient categories to whom data have been or will be disclosed, including third-country recipients and international organizations
- d. Where applicable, intended personal data retention duration or criteria for determining duration
- e. Your right to request data rectification, erasure, or processing restriction, and to object to processing
- f. Your right to lodge a complaint with a supervisory authority
- g. If data were not collected from you, all available source information

### **15.2. Right to Data Portability**

For processing based on consent or contract using automated means, you may request WHC to provide personal data you supplied in a recognized, easily-usable electronic format (e.g., Word, Excel), either to you or, if technically feasible, to a third party you designate.

### **15.3. Right to Rectification and Supplementation**

Data subjects have the right to request the rectification of their personal data processed by WHC if they believe such data is inaccurate or does not reflect the facts.

Furthermore, data subjects are entitled to request the completion of their personal data if they consider the information processed by WHC to be incomplete.

### **15.4. Right to Restrict Processing**

You may request that WHC restrict processing (unless law provides otherwise) if:

- a. You dispute data accuracy, in which case restriction applies while accuracy is verified
- b. Processing is unlawful and you object to erasure, requesting restriction instead
- c. WHC no longer needs the data for processing purposes, but you require it for legal claim establishment, assertion, or defense
- d. You have objected to processing; restriction applies until WHC's legitimate grounds are determined to outweigh yours

### **15.5. Right to Withdraw Consent and Right to Object**

Where WHC processes personal data based on the data subject's explicit consent, the data subject has the right to withdraw such consent at any time. In this case, WHC is obliged to delete the data subject's personal information without undue delay.

If WHC processes personal data for the purpose of pursuing its own or a third party's legitimate interests, or for business development purposes, the data subject has the right to object to the processing of their personal data at any time.



### **15.6. Right to Erasure**

You may request deletion of WHC-processed personal data if:

- You believe data processing is no longer necessary for its original purpose
- You do not consent to further processing (where processing is consent-based)
- You believe WHC is processing data unlawfully
- You explicitly object to processing (where the processing basis is WHC or third-party legitimate interests)

Initiate data deletion requests at [adatvedelem@whc.hu](mailto:adatvedelem@whc.hu) or through any WHC contact channel.

### **15.7. Legal Remedies**

If you believe WHC is unlawfully processing your data, you may file a complaint with WHC through any above contact channel. If this proves unsuccessful, you may contact the National Data Protection and Freedom of Information Authority or the courts.

- Contact the National Data Protection and Freedom of Information Authority at: Address: 1055 Budapest, Falk Miksa utca 9-11., Mailing Address: 1363 Budapest, P.O. Box 9, Telephone: +36-1-391-1400, +36 (30) 683-5969, +36 (30) 549-6838, Fax: +36-1-391-1410, Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), Website: <http://www.naih.hu>
- Court proceedings: Jurisdiction lies with the appropriate court. You may initiate proceedings at your court of residence or habitual residence. If the court grants your request, WHC must delete your personal data within three days of final judgment notification.

### **15.8. Exercise of Data Subject Rights**

Under Regulation Article 22, you are subject to decisions based solely on automated processing as described in Section VIII(10), as that processing is based on your explicit consent.

## **16. DATA PROCESSING GLOSSARY AND DEFINITIONS**

### **16.1. What Constitutes Personal Data?**

Information identifying or enabling identification of a natural person—such as name, email address, education, professional qualification, work experience, personal preferences, or IP address.

### **16.2. Who Is a Data Controller?**

The person or organization that independently or jointly determines data processing purposes and means.

### **16.3. What Does Data Processing Mean?**

Any operation or set of operations performed on data, regardless of method—including collection, recording, organization, storage, structuring, modification, use, consultation, disclosure, dissemination, alignment, combination, restriction, erasure, and destruction.



#### **16.4. What Does Joint Data Processing Mean?**

When two or more controllers jointly determine data processing purposes and means, they are joint controllers.

#### **16.5. Who Is a Data Processor?**

A person or organization processing personal data on behalf of a controller—typically performing technical operations such as storage or system administration.

01.06. 2025