

Partner in Pet Food Hungária Kft.

Data Protection Notice to Applicants

Latest update: 1 May 2024



PARTNER IN PET FOOD HUNGÁRIA KFT.

DATA PROTECTION NOTICE TO APPLICANTS

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1. General provisions, contact details

Partner in Pet Food Hungária Korlátolt Felelősségű Társaság (H-1112 Budapest, Boldizsár utca 4.; info@ppfeurope.com; +36 1 801 02 03) ("**Company**") is processing "*personal data*" (as defined in Article 4.1 of the General Data Protection Regulation 2016/679 of the EU - "**GDPR**") in connection with applicants ("**Applicants**") for jobs published on the website <http://www.ppfeurope.com> ("**Website**"), publicly advertised elsewhere or by other means (by electronically, personally or via post) even in the absence of any publicly announced posts. This data protection notice ("**Data Protection Notice**") provides the information related to the processing of such personal data and the rights and remedies which the Applicants may have in connection with such data.

The Company reserves the right to unilaterally modify this Data Protection Notice with subsequent effect, subject to the limitations provided for in the laws and with advance notification to the Applicants in due time, if necessary. The Company may modify this Data Protection Notice especially when it is required upon changes in the laws or the practice of the data protection authority, due to business needs or employees' needs, any new activity requiring the processing of personal data, or any newly revealed security exposures or feedback from Applicants. When communicating in relation to this Data Protection Notice or privacy issues or otherwise keeping in contact with the Applicant, the Company may use the contact details of the Applicant available to the Company in order to get or keep in contact. Upon request, the Company will for example send the Applicant a copy of the Data Protection Notice in effect from time to time or certify that Applicants have reviewed the Data Protection Notice.

2. Job applications and the processing of the relevant personal data

By submitting his/her job application including all personal data included in it, the Applicant represents and warrants that (i) such data relate to his/her own personal data only, or (ii) he/she has obtained appropriate and informed consent or other adequate legal basis for disclosing the personal data (for example if a reference person is indicated). In case the Company becomes aware that any personal data of a data subject was disclosed without his/her consent or any other appropriate legal basis, then the Company may immediately delete such personal data. The data subject is also entitled to exercise the rights and apply the remedies set forth in this Data Protection Notice. The Company will not bear liability for any loss, damage or harm which may be incurred in connection with a breach of the above covenant made by the Applicant.

The Company may receive personal data also from external companies e.g. from recruitment companies, head hunters. The data processing terms and conditions of such external company will be applicable to the data processing carried out by such external companies and the Company does not exercise control in connection with this. Where the purpose of processing personal data is required for the enforcement of the legitimate interests of the Company or those of a third party, the Company shall - upon a request submitted to the above contact details - provide the balancing test used for establishing such legitimate interest.

The Company wishes to draw the attention of the individuals concerned to the Applicants' right of objection to the processing of their personal data due to a cause related to their own situation any

time where the processing is based on legitimate interest. In such a case, the Company ceases processing the personal data unless it can prove that the processing has to be continued due to compelling legitimate reasons which override the interests, rights and freedoms of the data subjects or which relate to the submission, the enforcement or the protection of legal claims.

Where this Data Protection Notice indicates the relevant limitation period for the enforcement of claims as the duration of data processing, then any event which interrupts the limitation period shall extend the term of the data processing until the new date when the underlying claim may lapse (Section 6:25 (2) of Act V of 2013 on the Civil Code – the “**Civil Code**”). If the limitation period is interrupted, the claim can be enforced within one year from the time when the reason for interruption ceases to exist or, in respect of a limitation period of one year or less, within three months, even if the limitation period has already lapsed or there is less than one year or less than three months, respectively, remaining from it (Section 6:24 (2) of the Civil Code).

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
Processing the personal data of Applicants for the purpose of filling the posts announced by the Company and selected by the Applicants (recruitment), and documenting the selection process.	Article 6.1 (b) of the GDPR (data processing is necessary in order to take steps at the request of the data subject, to assess the application prior to entering into a contract of employment). The information on data processing shall apply in the event of the submission or forwarding the application of the Applicant to the Company by any means or form (including in particular: sending the application via e-mail, personal submission of a CV at the seat of the Company, or an application for an announced job through the channels as specified in the announcement). The Company cannot assess the job application without the relevant personal data. In respect of application for positions which require the establishment of employment, Section 10 (1) of the Act I of 2012 on the Labour Code apply. The Company can request from the employee the data which are material from the aspect of establishing employment, and the Company as a prospective employer may also request the Applicant to present documents material to the establishment of	The name and contact details (address, telephone number, e-mail address, and, as the case may be, the LinkedIn or other social media profile contacts, the address of a professional website) of the Applicants, the content of the CV and motivation letter, profile photo attached to the CV, knowledge of foreign languages, information related to previous work experience, place(s) of work, qualifications, skills and education, preferred professional area, references and, where available, expected salary figure. The CVs and applications may include personal data given voluntarily by Applicants, such as the place and date of birth, mother's maiden name, citizenship. The Company may receive such data directly from the Applicant or via third parties (e.g. recruitment companies). In the latter case, the terms and conditions of data processing determined by such third party may also apply to the data processing. The data processing includes clarification of the content of the job application on the job interview (if any) and processing of personal data related to the professional expectations, wishes communicated by the Applicant on the job interview, professional issues (if any), tasks and competencies.	The duration while the data are stored is 5 years after the completion of the selection procedure in accordance with Section 6:22 of the Civil Code in case of a possible claim by way of judicial or governmental proceedings against the Company in connection with the job application. This is the time period during which the Applicant may assert a claim in connection with the recruitment process e.g. on the grounds of the prohibition of negative discrimination or for the future assessment of job applications it may be justified for the Company to keep it on record internally for the aforementioned period in case somebody earlier applied for a job at the Company. In the event of the enforcement of a claim, the initial legal basis of the data processing shall be replaced by Article 6.1 (f) of the GDPR. The data processing will be required for the enforcement of the legitimate interest of the Company: participation in one or more proceedings related to the enforcement of the claim and presentation of the defence of the Company. In case the Applicant withdraws his/her application before the decision on the selection through one of the contact channels of the Company, then the Company deletes the data of the

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	employment even prior to the establishment of employment. In case of a successful selection, in the event of the involvement of a recruitment company, the Company notifies the recruitment company about the acceptance and the initial salary of the Applicant according to the terms and conditions of data processing of the agency. The purpose is the calculation of the commission payable for the successful recruitment to the agency. The legal basis of the data transfer is Article 6.1 (f) of the GDPR (the legitimate interest of the Company and the recruitment company). With respect to this kind of data processing the balancing test is attached to this Data Protection Notice in the form of a table. The legal basis of the processing of the data of the reference person is Article 6.1 (f) of the GDPR (the legitimate interest of the Company and the Applicant). With respect to this kind of data processing the balancing test is attached to this Data Protection Notice in the form of a table.	The Company prepares internal reports and notes in connection with applications regarding the assessment and the assessment criteria. In addition, the Applicant may give the names, positions and contacts of the reference persons in relation to the Applicant's former or present workplace, if the Applicant thinks that the relevant person (typically former professional supervisor, colleague) can give credible information on the professional experience and expertise of the Applicant. It is not obligatory to give such data or designate a reference person, failing which the Applicant will not suffer any discrimination on the part of the Company. If a reference person is designated, the Applicant represents that he/she has appropriate grounds for transferring the personal data of the reference person and does not breach the rights of the reference person by the transfer. If the Company contacts the reference person given, then the Company may only request information about the professional experience and expertise of the Applicant that is relevant to the job applied for and may not record any other data.	Applicant. The Company deems the withdrawal of the application as a waiver by the Applicant of any claims in connection with the application and lack of intention to enter into a contract. Within the organisation of the Company, the competent person of the area affected by the job application and the HR Department have access to the application and the personal data of the Applicant. The Company stores all job applications and the personal data included in them on a server and mailbox system to which the HR Department has exclusive access.

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
Evaluation of the assessment of the Applicant for the announced job (data processing in connection with the assessment and tests) after the review of the job applications – in accordance with the specifics of the job which is applied for. Professional assessment tests and their assessment take place with the help of an specialist in accordance with Section 10 (4) of the Labour Code if so required by any rule applicable to employment (by law or under the collective agreement) or if it is necessary to exercise a right or perform an obligation specified in the rule applicable to the employment. In the latter case the Company decides in advance to carry out such an assessment test and - if needed for filling particular posts, the Company notifies the Applicants of the type and purpose of the assessment test prior to the test is conducted.	Article 6.1 (f) of the GDPR (the legitimate interest of the Company). The legitimate interest: carrying out the manufacturing activities of the Company at high standards, compliance with the applicable laws and getting to know the expected professional competences in the light of the aforesaid. Applicants can ask their questions related to the assessment test on the premises both in advance of the tests as well as in the course of them. The balancing test is attached to this Data Protection Notice in the form of a table.	The questions raised with the aim of evaluating assessment strictly relate to the examination of the professional competences that are essential for filling the applied/announced job. The examination is carried out by a professional member of the Company's own personnel who is bound by confidentiality. In the course of this, such person evaluates the answers given by the Applicant on test forms/ online/in the course of a personal interview. The test forms / the on-line screen allow learning the evaluation criteria, or in a personal interview, the criteria are disclosed to the Applicant in advance. The above-mentioned competent person informs the Company exclusively about the findings of the assessment, where applicable, i.e. (i) whether the Applicant has been found suitable for the particular post, or (ii) that the Company should procure that additional pre-requisites are fulfilled e.g. further trainings, or, in case of managerial positions, the possibility for management trainings should be provided.	The Company stores the findings of the assessment for a 5-year period starting with the date when the recruitment process closed or the application is reviewed in the light of the possibility of a claim or judicial or government proceeding which the Applicant may initiate against the Company in connection with the job application (Section 6:22 of the Civil Code) or it may be justified for the Company to keep the findings on record internally for the evaluation of future vacancies for the above period in case anyone applied for a job at the Company.

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
Keeping CVs of other documents related to job applications (e.g. motivation letters) of Applicants and the findings of the assessment test and the notes taken by the Company on the interview in order to make it possible that the Company could contact the Applicant later with an offered job directly (e.g. when a job becomes vacant).	Article 6.1 (a) of the GDPR (voluntary consent). The Company may request the Applicant to give consent to retaining the documents of his/her job application even after the closing of a recruitment process or in the absence of a job vacancy with the purpose of making a future offer (e.g. when there is no vacancy in the particular area related to the application of an Applicant but there may be one later). The Applicant may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal. The consent is voluntary; however, the Company cannot directly address the given Applicant with a job offer in the future in the absence of the consent.	The scope of the data which the Applicant shared with the Company initially, the result of the assessment test conducted by the Company and the notes taken of the Applicant by the Company on the interview.	Until the consent of the Applicant is withdrawn, or in the absence of the aforesaid, for 2 years following completion of the recruitment process, the sending/submission of the job application to the Company. In the opinion of the Company, this is time period while the data required to fulfil the purpose of the data processing may remain accurate and up-to-date. For example, the actual experience of a particular Applicant is not sufficient for the job at the date of the application, but the same Applicant may become suitable later to fill a future post or if the job applied for becomes vacant again. The Applicant may request the deletion of his/her data any time. The Company deems such a request as a waiver of any claims against the Company in connection with the storage of the documents of the particular job application by the Company. Within the organisation of the Company, the competent person of the area affected by the job application and the HR Department have access to the application and the personal data of the Applicant included in it. The Company stores all job applications and the personal data included in them on a

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
			server and mailbox system to which the HR Department has exclusive access.
Organising the Applicant's travel and booking accommodation and processing related personal data It is a case like this when the job interview is held in another country and the Company arranges for the travel and books accommodation subject to prior consultation with the Applicant.	Article 6.1 (f) of the GDPR (the legitimate interest of the Company and the Applicant). Legitimate interest: holding the interview more efficiently, thus ensuring that the Company can interview the Applicant in a hotel more easily reachable for the Applicant or the person taking part in the selection process on the part of the Company or the Applicant is directly interviewed at the prospective place of work (as a result the Applicant will also have a more exact idea of his/her future work and colleagues) and reducing the administrative burdens of the Applicant.	Personal data of the Applicant with respect to travelling and booking accommodation, including without limitation, the name of the Applicant, date and time of the job interview, consultation, arrival and departure, type of travelling ad vehicle taken for travelling (e.g. airplane, international train, etc.), features of the room booked and the data of the related accommodation services and data with respect to special needs (if any) in relation to travelling and/or accommodation (e.g. business class plane ticket, special breakfast menu at the place of accommodation, etc.)	The data retention period is a 5 years starting with the date when the recruitment process closed in the light of the possibility of a claim or judicial or government proceeding which the Applicant or any third person may initiate against the Company in connection with the travel and accommodation (Section 6:22 of the Civil Code). In respect of the costs incurred by the Company in connection with organising the travel and the accommodation the Company shall retain the data necessary for the settlement of its tax liability for 5 years of the last date of the calendar year in which the tax should have been declared or reported or, in the absence of such declaration or report, the tax should have been paid (Sections 78 (3) and 202 (1) of Act CL of 2017 on Taxation. In addition, if the Company needs to retain the data to comply with accounting obligations pursuant to Sections 168-169 of the Act C of 2000 on Accounting ("Hungarian Accounting Act"), the data will be erased after 8 years. The 8 years'

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			retention period shall be counted from the day of a given year when the accounting item arises in relation to the data or the accounts/accounting relied on the relevant data in any way. In practice if the data appears in an agreement under which more completions arise (e.g. several trips are arranged or rooms are booked during the term of the agreement), the 8 years' period shall be counted from each completion separately, because there is a separate invoice for each completion, based on which the transaction is entered into the accounts. If the data appears in an agreement, which for example provides for the arrangement of one single trip or the booking of one single room (the trip is made and upon completion the agreement terminates), then the transaction is entered into the books under the agreement based on the invoice in the given year and the 8 years start from then.
Management of complaints, concerns on whistleblowing matters, including - confirmation of receipt of the report, - investigation of the report, - taking measures based on the report,	Article 6 (1) c) of the GDPR: fulfilment of a legal obligation. The EU and national law ordering the data processing: Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the Protection of Persons who Report	Whistleblower's (data subject's) data - Name and contact information (e.g., phone number, email address, address) - Employment / contracting details (e.g., job title, department, employee ID) - Any other identification data disclosed in the report	If the investigation of the report can be omitted, or if based on the investigation, the report is found to be unfounded or no further action is necessary, the Company will delete the data related to the report within 60 days of the failure to investigate or the completion of the investigation.

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communication with the whistleblower and other data subjects. The Whistleblowing Policy of the Company contains the detailed procedural rules of and other information in relation to the whistleblowing process (https://www.ppf.europa.com/media/uploads/PPF%20ESG%20Policy%202023.pdf).	Breaches of Union Law, and the relevant national laws transposing the Directive (EU) 2019/1937 – in Hungary, it is Act XXV of 2023 on Complaints, Reports in the Public Interest, and Rules relating to Reporting Abuse.	Subject of the report (person(s) accused of the suspected wrongdoing) - Name - Contact information (depending on the channel the whistleblower reported the complaint/concern) - Employment / contracting details - Details of the report, including the suspected wrongdoing Witnesses and other involved parties (data subjects) - Name - Contact information - Employment / contracting details - Statements or testimonies provided Details of the suspected wrongdoing - Description of the suspected wrongdoing - Date and time of the suspected wrongdoing - Location of the suspected wrongdoing - Any supporting documents or evidence (e.g. emails, recordings) Investigation data - Notes and findings regarding the report, e.g. acceptance, rejection	In other cases, the Company processes the data until the time of a possible action (e.g., disciplinary action, contractual termination) or the preparation of steps related to legal claim enforcement and the actual claim enforcement, which is usually 5 years, in accordance with Section 6:22 of the Civil Code. If, after the investigation, an official procedure or a court proceeding is initiated, the Company will process the personal data until the final conclusion of the given procedure. The official documents created are kept by the Company in accordance with the official rules for the preservation of such documents.

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		• Notes and findings from the investigation • Interview records • Preservation measures to ensure the integrity of the investigation and to prevent the destruction of evidence • Conclusion and outcomes of the investigation, e.g. internal reports, executed or planned follow-up measures, disciplinary or legal actions Other related data: • Legal protections for the whistleblower, e.g. to prevent discrimination and retaliation against individuals who report a suspected wrongdoing. • Any communications regarding the report (e.g., emails, letters, notifications, objections, disclosures) • Metadata (e.g. submission dates, times, IP addresses if submitted electronically) • Any other data that are processed to ensure that the whistleblowing process is thorough, transparent, and fair.	

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
Data processing related to the enforcement of the data protection rights of the Applicant (see Section 5 in detail)	Article 6 (1) (c) of the GDPR (processing is necessary for compliance with a legal obligation to which the Company as a controller is subject) Legal obligation: to enable data subjects to exercise their rights set out in Articles 15-22 of the GDPR and document any other step in relation to inquiries.	Personal data related to inquiries received by the Company in respect of data processing: in the case of individuals / legal entities or other organisations contacting the Company, the data of the contact person necessary for making contact (including without limitation name, address, e-mail, phone), the content of the inquiry and steps taken and documents made in relation to the inquiry. For example if the Applicant requests the deletion of all his/her data by email under the GDPR and the Company performs this request, then the email itself in which the Applicant requested deletion will nevertheless be kept.	The retention period is indefinite unless the data protection authority gives any other guidance.
Archiving the consents of Applicants to data processing and the withdrawals of consents (if any)	Article 6 (1) (c) of the GDPR (processing is necessary for compliance with a legal obligation to which the Company as a controller is subject) Legal obligation: Under Article 7 (1) of the GDPR where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data.	If any data processing of the Company is based on the consent of the data subject, the Company will archive the given consent. The purpose is to justify the lawfulness of the consent at any time. If the data subject withdraws his/her consent, the Company will retain the declaration of withdrawal (and the related communication). The purpose is to ensure that the Company is always aware of the fact that an individual has withdrawn his/her consent to a specific data processing.	The retention period is indefinite unless the data protection authority gives any other guidance.

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Keeping records of personal data breaches (including the documenting steps taken in relation to responding to incidents)	Article 6 (1) (c) of the GDPR (processing is necessary for compliance with a legal obligation to which the Company as a controller is subject). Legal obligation: Under Article 33 (5) of the GDPR the controller shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken. That documentation shall enable the supervisory authority to verify compliance with the GDPR.	Personal data of the data subjects affected by the data protection breach	The retention period is indefinite, unless the data protection authority gives any other guidance.

3. Data security measures applied by the Company

The Company protects the personal data it processes primarily by restricting access to the information and by the unambiguous regulation of the rights to use them. Only such persons may have access to the systems and instruments used for processing the personal data under this Data Protection Notice whose access is required in order to fulfil the above-mentioned purposes and who are authorised to have such access. These persons include e.g. designated team members or departments (e.g. to user data that are required for the use of the employer's IT systems, it is the IT Department authorised to have access).

The Company ensures the safe and legitimate use of the devices which it makes available (including Company-owned computers, laptops and mobile phones), the e-mail accounts and the Internet and the desirable level of awareness of the employees related to such use by applying the following measures:

- The Company expects that the devices which it made available and which have access to the Internet as well as the e-mail accounts are used by the employees with specific user names and password which are adequately complex and up-dated at determined intervals.
- The Company protects all its systems and devices by fire walls, antivirus software and spam filters. In addition, the Company operates an intrusion protection system (so-called IPS) which enables the detection, blocking and logging of illegitimate attempts of access to the computers systems of the Company.
- The Company makes available safe wired and wireless network access for all devices.
- Remote access to the systems and software of the Company from any device is possible only by safe connection (VPN) by using specific user names and passwords, with mitigation of chances of accidental access (including illegitimate access by the use of stolen or lost devices)
- The IT Department of the Company carries out regular software and system up-dates and back-up saves of data in accordance with its own internal regulations.

As regards the physical protection of data and that of electronic documents, the Company owns locked server rooms and procures that access to a particular document is reserved to adequately authorised persons only (e.g. access to HR documents is reserved to the HR Department).

4. Data transfer to other data controllers

The Company may share personal data within its group of companies. The recipients of the data transfers act as independent data controllers. This means that they may determine the purpose of data processing independently or jointly with others (including the Company as the case may be), make decisions and implement them, or have them implemented by a data processor engaged for that purpose, regarding data processing (including the instrument to be used).

The legal basis for data transfer within the group of companies is Article 6.1 (f) of the GDPR (the legitimate interest of the Company).

The legitimate interest: unifying and enhancing the group-level recruitment tasks of the Company and the group members. For example: the employment of a new IT team member by PPF Poland is carried out with the involvement of the IT Department and the HR Department of the PPF company in Hungary. The new team member in Poland will also work together with his/her colleagues located in Hungary and, therefore, it is also the legitimate interest of the company in Hungary that it could evaluate the assessment of the new team member. The affected PPF company processes the data in the job application in accordance with its own Data Protection Notice covering the processing of personal data and in accordance with its own national laws.

The scope of addressees includes the following:

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5. Data protection rights and remedies

5.1 Rights and remedies

The detailed rights and remedies of the individuals, including the Applicants and the persons referred to in point 2 herein (e.g. person who submit a job application on behalf of somebody else), are set forth in the applicable provisions of the GDPR (especially in Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80, and 82 of the GDPR). The summary set out below describes the most important provisions and the Company provides information for Applicants and other affected persons in accordance with the above articles about their rights and remedies related to the processing of personal data.

The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the individual, information may also be provided orally, provided that the identity of the individual is proven by other means.

The Company will respond without unreasonable delay and by no means later than within one month of receipt to the request of an individual whereby such person exercises his/her rights about the measures taken upon such request (see Articles 15-22 of the GDPR). This period may be, if needed, extended by further two months in the light of the complexity of the request and the number of requests to be processed. The Company notifies the individual about the extension also indicating its grounds within one month of the receipt of the request. Where the request has been submitted by electronic means, the response should likewise be sent electronically unless the individual otherwise requests.

In case the Company does not take any measure upon the request, it shall so notify the individual without delay but by no means later than in one month stating why no measures are taken and about the opportunity of the individual to lodge a complaint with the data protection authority and to file an action with the courts for remedy.

5.2 The data subject's right of access

- (1) The affected person has the right to obtain confirmation from the Company whether or not personal data concerning him/her are being processed. Where the case is such, then he/she is entitled to have access to the personal data concerned and to the following information:
 - a) the purposes of the processing;
 - b) the categories of personal data concerned;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed;
 - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - e) the right of the affected person to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the affected person or to object to such processing;
 - f) the right to lodge a complaint with a supervisory authority; and
 - g) where the personal data are not collected from the data subject, any available information as to their source.
- (2) The Company provides a copy of the personal data undergoing processing to the data subject. The Company may charge a reasonable fee based on administrative costs for requested further copies. Where the affected person submitted his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless otherwise requested by the data subject.

5.3 Right to rectification

The data subject has the right to request that the Company rectify inaccurate personal data which concern him/her without undue delay. In addition, the data subject is also entitled to have incomplete personal data completed e.g. by a supplementary statement or otherwise.

5.4 Right to erasure ('right to be forgotten')

- (1) The affected person has the right that when he/she so requests, the Company shall erase the personal data concerning him/her without delay where one of the following grounds applies:
 - a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Company;
 - b) the affected person withdraws consent on which the processing is based, and is no other legal ground subsists for the processing;
 - c) the affected person objects to the processing and there are no overriding legitimate grounds for the processing;

- d) the personal data have been unlawfully processed;
 - e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject; or
 - f) the collection of the personal data occurred in connection with offering services regarding the information society.
- (2) Paragraph (1) shall not apply to the extent that processing is necessary, among other things, for:
- a) exercising the right of freedom of expression and information;
 - b) compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject;
 - c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
 - d) the establishment, exercise or defence of legal claims.

5.5 Right to restriction of processing

- (1) The affected person has the right to obtain a restriction of processing from the Company where one of the following applies:
- a) the accuracy of the personal data is contested by the affected person, for a period enabling the Company to verify the accuracy of the personal data;
 - b) the processing is unlawful and the affected person opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the Company no longer needs the personal data for the purposes of the processing, but the affected person requires them for the establishment, exercise or defence of legal claims; or
 - d) the affected person has objected to processing pending the verification whether the legitimate grounds of the Company override those of the affected person.
- (2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with consent of the affected person or for the establishment, exercise or defence of 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.
- (3) The Company informs the affected person whose request has served as grounds for the restriction based on the aforesaid, before the restriction of processing is lifted.

5.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing

The Company will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company informs the affected person about those recipients if he/she so requests.

5.7 Right to data portability

- (1) The individual has the right to receive the personal data concerning him/her, which he/she has provided to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company, where:
- a) the processing is based on consent or on a contract; and

- b) the processing is carried out by automated means.
- (2) In exercising the right to data portability pursuant to paragraph (1), the individual shall have the right to have the personal data transmitted directly from one controller to another (thus from the employer to another data controller), where technically feasible.
- (3) Exercising the aforesaid right shall be without prejudice to provisions concerning the right to erasure ('right to be forgotten') and, further, this right shall not adversely affect the rights and freedoms of others.

5.8 Right to object

- (1) The affected person has the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data concerning him/her for the purposes of legitimate interests. In this case the Company will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the affected person or for the establishment, exercise or defence of legal claims.
- (2) Where personal data are processed for scientific or historical research purposes or statistical purposes, the affected person, on grounds relating to his/her particular situation, has the right to object to processing of personal data concerning him/her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

5.9 Right to lodge a complaint with a supervisory authority

The affected person has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the GDPR. In Hungary, the competent supervisory authority is the Hungarian Authority for Data Protection and Freedom of Information (<http://naih.hu/>; 1530 Budapest, Pf.: 5.; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu)

5.10 Right to an effective judicial remedy against a supervisory authority

- (1) The affected person has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him/her.
- (2) The affected person has the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform him/her within three months on the progress or outcome of the complaint lodged.
- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

5.11 Right to an effective judicial remedy against the Company or the processor

- (1) The affected person, without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, has the right to an effective judicial remedy where he/she considers that his/her rights under the GDPR have been infringed as a result of the processing of his/her personal data in non-compliance with the GDPR.
- (2) Proceedings against the Company or a processor shall be brought before the courts of the Member State where the Company or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the affected person has habitual residence. In Hungary, the competent court is the tribunal. The affected person

has the right to initiate proceedings at the tribunal of his/her domicile or place of residence, as he/she selects. You can find information on and contacts of the competent courts (tribunals) at www.birosag.hu.

Schedule
The balancing tests carried out by the Company in relation to data processing based on legitimate interest

With respect to the processing of the Applicant's data the tables below contain the balancing tests in relation to the data processings which the Company carries out based on legitimate interest, showing why the legitimate interests of the Company or third persons override the interests and fundamental rights and freedoms of the data subjects which make the protection of personal data necessary.

Assessment of the Applicant's professional suitability for the job applied for (data processing in relation to the assessment and tests) after the review of job applications – depending on the specifics of the job applied for	
1. Is it inevitably necessary to carry out the assessment of suitability of Applicants who have submitted applications for the jobs concerned? Are alternative solutions for the same available which may serve the same purpose without processing personal data?	No data processing solution is available which would affect the personal data of data subjects to a lesser extent while serving the purposes of the data processing with similar efficiency. In the light of the manufacturing activities of the Company (i.e. producing pet food) and the required high standard product quality, the safety of persons and assets, compliance with occupational and health-related safety as well as animal health requirements, it is inevitably needed in respect of certain jobs to carry out assessments in the course of recruitment-related interviews in order to evaluate certain professional competences that are required for certain jobs. In the light of the above, the assessments concern the particular applicants exclusively who submitted applications for jobs which the Company had announced.
2. The legitimate interest of the Company	The following are the legitimate interests of the Company: - carrying out product manufacturing by the Company continuously, safely and in a compliant manner to meet high quality standards; - compliance with the legal provisions and industrial standards and regulations regarding product quality, safety regulations regarding persons and assets, work safety as well as the safety of human and animal health; - taking the above interests into account, for filling managerial and in other critical areas defined by the Company, including certain specialist posts (e.g. product development and controlling) evaluation of certain professional competences is inevitably needed.
3. What is the purpose of the data processing? What kind of personal data need to be processed, for what purpose and for how long in the light of the legitimate interests in question?	The purpose of processing data is the assessment of the Applicant's suitability for the job he/she has applied for. The Company processes exclusively the findings of the assessments i.e. the fact whether the Applicant is suitable for the particular job or whether further conditions need to be provided by the Company for the job; in the latter case to provide these conditions, e.g. further professional education, or in the case of management positions to provide possibility for managerial training.

	The assessment of the Applicant's answers given in test forms / on-line screen / in the course of a personal interview are exclusively carried out by a competent person engaged by the Company as a member of its own personnel who is bound by confidentiality. Before starting the assessments, the Company informs the affected Applicants in each case about the need to carry out the examination, the examined professional competences and the examination process, their rights and remedies and the Company procures that they may become familiar with those in advance through the aforesaid channels.
4. What are the interests of the affected persons with respect to the data processing?	Respecting the privacy rights, the rights and freedoms of the Applicants concerned attaching to their personal data. The Company takes this into account to the fullest extent possible even at the time when the assessment tests concerned were prepared and at the selection of the competent team member who belongs to the personnel of the Company and is bound by confidentiality.
5. Why does the legitimate interest of the Company override the rights and freedoms of the affected persons proportionately?	- The Company carries out assessments in connection with certain jobs only (especially, of management positions and those in certain critical areas); - The purpose of the assessments is the evaluation of professional competences that are required for particular jobs; the aim is not the assessment of personal competences, in general; - Before starting the assessments, the Company informs the Applicants that assessments are needed, about the examined competences and the examination process as well as their rights and available legal remedies; - The Applicants have the right to ask questions from the Company before and during the assessments; - Only team members of the Company's own personnel have authority to learn the content of and handle the paper-based or on-line test sheets and the summary report prepared by a competent person about the answers given in the course of the interviews; - While the test sheets and the answers given in the course of the interview are evaluated only the given answers are taken into account i.e. other attributes and circumstances (e.g. the handwriting) are not considered; - The Company is accessing and handling only the findings of the examinations i.e. the fact whether or not the Applicant has been found suitable to fill the particular post and whether further conditions need to be provided for the job and, if so, which those conditions are; - Within the organisation of the Company, only the competent person of the area affected by the application and those of the HR Department can have access to the findings of the assessments.

Data transfer to the recruitment company in order to calculate the fee for successful recruitment	
1. Is data processing inevitably necessary? Are alternative solutions for the same available which may serve the same purpose without processing personal data?	No data processing solution is available which would affect the personal data of data subjects to a lesser extent while serving the purposes of the data processing with similar efficiency. In case of successful selection – in accordance with the agreement between the Company and the recruitment company - the recruitment company needs to be informed about the selection and the initial salary of the Applicant for the calculation of the fee for successful recruitment, so there is no alternative solution available that would not entail the processing of personal data or would entail the processing of less or other personal data. In the light of the above, the above-mentioned data processing only concerns the Applicants who have been successfully selected by the Company and whose personal data are processed to a minimal extent for the calculation of fee for recruitment.
2. The legitimate interest of the Company and the recruitment company	The following are the legitimate interests of the Company: - calculation of the fee of the recruitment company for successful recruitment; - performance of the agreement between the Company and the recruitment company and maintaining and strengthening the business relationship between the parties.
3. What is the purpose of the data processing? What kind of personal data need to be processed, for what purpose and for how long in the light of the legitimate interests in question?	The purpose of data processing is to transfer data to the recruitment company in order to calculate the fee for successful recruitment. The scope of the data concerned: the fact of successful selection and the initial salary and data needed for identification of the Applicant concerned (in particular the name of the data subject, if required for the calculation of the fee, his/her job title, seniority). With regard to possible claims and settlement disputes arising from the agreement between the parties, the Company processes the data for 5 years after the termination of the agreement with the recruitment company (Article 6:22 of the Civil Code).
4. What are the interests of the affected persons with respect to the data processing?	Respecting the privacy rights, the rights and freedoms of the Applicants concerned attaching to their personal data, which were taken into account to the fullest extent possible even at the time when the data processing was elaborated.
5. Why does the legitimate interest of the Company override the rights and freedoms of the affected persons proportionately?	- the Company only processes the data of the Applicants affected by successful selection; - the data processing is limited to the recruitment company, to the data necessary for the calculation of the fee payable by the Company, other data not necessary for the above purpose will not be transferred to the recruitment company; - the Company does not use the above data for other analyses.

Data processing related to contacting reference persons	
1. Is data processing inevitably necessary? Are alternative solutions for the same available which may serve the same purpose without processing personal data?	No data processing solution is available which would affect the personal data of data subjects to a lesser extent while serving the purposes of the data processing with similar efficiency. The Applicant may also provide the names, positions and contact details of the reference persons related to his/her previous or current job, if he/she considers that the person concerned (typically former professional supervisor, colleague) can provide credible information about his/her professional experience and expertise. If the Company contacts the given reference person, then the Company may only request information in relation to the Applicant's professional experience and expertise that is relevant for the job applied for, and may not record any other data. In the light of the above, the above data processing is limited to the reference persons (typically former professional supervisor, colleague) provided by the Applicants, based on the Company's and the Applicant's legitimate interest, the Company processes the Applicant's data regarding the contacting of the reference persons (for example: opinion, information given by the reference person of the professional experience of the Applicant concerned) subject to the Applicant's consent which the Applicant gives by specifying the reference person. However, the designation of a reference person by the Applicants is not obligatory, it is in any event the Applicant's own decision.
2. The legitimate interest of the Company and the recruitment company	The following has to be deemed as the legitimate interests of the Company and the Applicant: - obtaining information about the Applicant's professional experience and expertise; - relying on the above information when making a decision whether to hire the Applicant.
3. What is the purpose of the data processing? What kind of personal data need to be processed, for what purpose and for how long in the light of the legitimate interests in question?	The purpose of data processing is to obtain information about the Applicant's professional experience and expertise and contact the reference person indicated by the Applicant for this purpose. The scope of the data involved is the name, position, and hierarchical relationship with the Applicant (for example professional supervisor) of the reference person indicated by the Applicant, as well as his/her contact details (including the e-mail address of the reference person). The Company will process the data for 5 years after the completion of the selection procedure under Section 6:22 of the Civil Code in case any claim or court or administrative procedure is brought by the Applicant in relation to the job application against the Company.
4. What are the interests of the affected persons with respect to the data processing?	Respecting the privacy rights, the rights and freedoms of the relevant reference person, which were taken into account to the fullest extent possible even at the time when the data processing was elaborated.
5. Why does the legitimate interest of the Company override the rights and freedoms of the affected persons proportionately?	- the Company only processes the data of the reference person indicated by the Applicant; - the Company only contacts the reference person in order to obtain information related to the Applicant's professional experience and expertise; - the reference person may be contacted at such a time and in such a way as not unduly inconvenient to the reference person (for example, the Company does not contact the reference person late at night);

	- the Company does not use the above data for other analyses and does not process any other data not necessary for any of the above purposes (for example opinion or other information not related to the Applicant's professional experience or expertise); - if the given reference person does not wish or cannot provide information about the Applicant's professional experience or expertise, the Company does not process data in this regard.
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