

PRIVACY POLICY

The purpose of this notice is to make transparent the data processing procedures followed by our company as a data controller when contacting it and the principles and rules relating to the protection of natural persons with regard to the processing of their personal data. The fundamental aim of the controller is to respect in all cases the fundamental rights and freedoms of these natural persons, in particular their right to the protection of their personal data.

1. DEFINITIONS

data processing: any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

controller: a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or specific criteria for the designation of the controller may also be determined by Union or Member State law

GDPR: REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation)

Civil Code: Act V of 2013 on the Civil Code

Accounting Act: Act C of 2000 on Accounting

personal data: any information relating to an identified or identifiable natural person ('**data subject**'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

2. CONTACT

Hiflylabs Private Limited Company

registered office and mailing address: 1114 Budapest, Bartók Béla út 15/B. 1. floor. 5.

company registration number: 01-10-049237

Tax number: 25809796-2-43

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3. CERTAIN PROCESSING OPERATIONS

3.1. Job applications

Data managed	Purpose of data processing	Legal basis for processing	Duration of data processing
Name	Identifying the candidate and assessing his/her suitability for the job applied for, liaising with the candidate during the application process, assessing the application and, if the requirements are met, establishing an employment relationship.	Article 6(1)(b) GDPR: taking steps at the request of the data subject prior to the conclusion of the (employment) contract	Until the selection process is completed.
phone number			
e-mail address			
place of residence (city)			
other personal data contained in the CV and any annexes	--- In the event of an unsuccessful job application, subsequently informing the person concerned if a relevant position opens up in our company that matches their professional experience and qualifications.	Article 6(1)(a) GDPR: consent of the data subject	3 years after the end of the selection process, but until the withdrawal of the consent, which the data subject may do at any time by sending a statement to the contact details of our company indicated in point 2.
notes and evaluations of the candidate during the selection process			

3.2. Marketing enquiries

As part of our marketing activities, our Company processes the data of natural persons who work for or represent legal entities to which our services may be potentially relevant, as follows. In most cases, we collect data directly from these individuals when they provide us with a business card when contacting us in person at business events or conferences, when they provide us with their contact details to download professional content (such as analyses, reports) or to participate in professional events or webinars, and in some cases we obtain data from publicly available professional social networking sites (such as LinkedIn), databases, and from the organisers of professional events or conferences who provide us with the data they collect.

Data managed	Purpose of data processing	Legal basis for data processing	Duration of data processing
Name	Targeted distribution of professional content, business offers and marketing materials to potential business partners through their employees and representatives, information about	GDPR Article 6(1)(f): legitimate interest of our company	The processing lasts until the data subject is informed of the termination of his or her employment or representation relationship with the organisation
e-mail address			
job title			

name of employer/represented organisation	professional events and business networking.		relevant to our services , but at the latest until the data subject objects.
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With regard to the processing of the above data for direct marketing purposes, we hereby expressly inform the data subjects that they may object to the processing of their personal data for these purposes at any time by clicking on the 'Unsubscribe' button in the marketing emails or by contacting us at the contact details indicated in point 2. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data will no longer be processed by our company for these purposes.

In some cases, we also carry out joint processing with other data controllers for the purposes set out in this section. Details of such joint processing with the other controller will in each case be provided to data subjects separately on the relevant data collection interface.

3.3. Contact details

Our Company processes the personal data of the contacts of our legal entity partners (existing and potential customers, suppliers) with whom we have a business relationship or are in the process of establishing such a relationship, as follows:

Data managed	Purpose of data processing	Legal basis for data processing	Duration of data processing
Name	Facilitate relations with business partners, conduct business negotiations, bidding, submitting proposals and managing the bidding process, preparing, concluding and executing contracts, and enforcing claims and rights arising from contracts or business relationships. --- Targeted delivery of professional content, business offers and marketing materials to our business partners through their contacts, information about professional events and business networking.	GDPR Article 6(1)(f): legitimate interest of our company or our business partner	In the case of a contractual relationship with a business partner, the data are processed 5 years after the termination of the contract [general limitation period - Civil Code § 6:22 (1)], while in the case of a pre-contractual relationship, the data are processed from the time of contact for as long as the establishment of a future business relationship with the given partner may realistically arise, and knowledge of the documentation of previous negotiations, offers, tenders may be necessary for this purpose.
e-mail address			
phone number			
job title			Pending notification of the termination of the contact person's status, but no later than the date of the objection by the data subject.
department			

The data subject may object to the processing at any time, as set out in point 5.5, in which case our company will decide on the termination or maintenance of the processing based on a balance of the legitimate interests of the data subject and our company.

The personal data as defined above belongs to the employee of our legal entity business partner (as the natural person acting as a contact person), and the personal data will be transferred to our company by our business partner or by the data subject himself to the extent necessary for the contact. In such cases, our business partner, as the employer of the data subject, will be entitled to use the personal data of the data subject in accordance with Article 6(1)(b) GDPR and the Labour Code. Article 10 (1) of the GDPR, while our company receives and processes the personal data from the data subject in accordance with Article 6 (1) (f) of the GDPR to the extent and for the duration necessary for the purposes of its own legitimate interests and those of our business partner.

3.4. Details of our sole trader partners

Our company also uses the services and assistance of persons acting in a self-employed capacity in the course of its activities. Please note that although our sole trader partners are engaged in commercial economic activities, their data will be processed as data subjects of natural persons in accordance with the GDPR. In the business relationship with our sole trader partners, we process data as described below:

Data managed	Purpose of data processing	Legal basis for data processing	Duration of data processing
Name	Identifying our partner, concluding and performing the contract, settling accounts with our partner (checking and paying invoices), fulfilling accounting obligations, and enforcing claims and rights arising from the contract	Article 6(1)(b) GDPR: creation and performance of a contract Article 6(1)(c) GDPR: compliance with a legal obligation With regard to the enforcement of claims and rights, Article 6(1)(f) GDPR: legitimate interest of our company	5 years after the termination of the contractual relationship [general limitation period - Civil Code 6:22 (1) §] In respect of the data contained in the documents supporting the accounting, the period of 8 years under the Accounting Act [Section 169 (1)-(2) of the Act on Accounting].
address			
registration number			
tax number			
bank account number			
e-mail address	Liaising with our business partner and enforcing claims and rights arising from the contract	For the purposes of contact, Article 6(1)(b) GDPR: performance of a contract With regard to the enforcement of claims and rights, Article 6(1)(f) GDPR: legitimate interest of our company	5 years after the termination of the contractual relationship [general limitation period - Civil Code 6:22 (1) §]
phone number			
information on your professional background, such as qualifications, previous professional experience, etc.	Assessing the possibility of professional cooperation between our company and our potential partner, comparing our partner's professional background with our company's expectations in order to prepare the business relationship.	Article 6(1)(b) GDPR: creation of a contract	During the duration of the contractual relationship.

3.5. Exercise of rights of access

In the context of ensuring the exercise of the rights set out in point 5 of this notice, we process data as follows:

Data managed	Purpose of data processing	Legal basis for processing	Duration of data processing
data relating to the request to exercise the right of access	Examining the request, taking measures if necessary and informing the person concerned.	Article 6(1)(c) GDPR: compliance with a legal obligation [Article 12 GDPR]	5 years from our reply to the request of the person concerned [general limitation period - Civil Code 6:22 (1) §1]

4. THE RECIPIENTS OF PERSONAL DATA AND THE TRANSFER OF DATA

4.1. The recipients of personal data are the natural or legal persons with whom or to which the personal data are disclosed. The processing of personal data is primarily carried out directly by our company as the data controller, whereby our company endeavours to ensure that personal data are only disclosed to the strictly necessary persons. The categories of persons who are authorised to carry out such processing are the following:

- the employees responsible for recruitment and the managers responsible for the advertised position in relation to the processing operation referred to in point 3.1
- employees in sales, marketing and finance, employees in the delivery department and IT colleagues in relation to the processing operations referred to in points 3.2 and 3.3
- employees working in the financial area and those responsible for supplier and partner relations in relation to the processing operation referred to in point 3.4.
- the employees performing legal, data protection and compliance tasks and the competent employees in the field concerned by the nature of the data subject's request in relation to the processing operation referred to in point 3.5
- the management of all processing operations

4.2. In order to carry out certain activities underlying the processing operations, our company uses the services of external partners to which certain personal data of the data subject are (are) transferred. The identity of these recipients may vary, but the scope of the recipients is as set out below:

- a provider of an online platform for managing and registering job applications [currently SmartRecruiters Ltd (based at 190a Bermondsey Street SE1 3TQ, London, United Kingdom)]
- a provider of customer relationship management and marketing automation systems [currently HubSpot Ireland Ltd (based at 1 Sir John Rogerson's Quay Dublin 2, Ireland)]
- IT infrastructure and mail system provider [currently Google Ireland Limited (based in Google Building Gordon House, Barrow St, Grand Canal Dock, Dublin 4, D04 V4X7, Ireland)]

4.3. As a general rule, our Company does not transfer personal data of data subjects of the processing operations described in this notice to third countries or international organisations pursuant to Chapter V of the GDPR. An exception to this is the transfer of data to SmartRecruiters Ltd, , UK, as referred to in point 4.2,

which will however be carried out in accordance with the provisions of the GDPR (Article 45 of the GDPR), given that the European Commission has determined in an adequacy decision that the United Kingdom ensures an adequate level of protection for personal data.

5. DATA SUBJECTS' RIGHTS IN RELATION TO DATA PROCESSING

The rights of data subjects are set out in detail in the relevant provisions of the GDPR (in particular Articles 12-22 and 77-80), which our company, as data controller, provides an overview of below.

Measures taken in response to a request to exercise the rights of the data subject shall be communicated to the data subject within a maximum of one month of receipt of the request. The date of receipt of the request shall not count towards the time limit. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The extension shall be notified to the person concerned within one month of receipt of the request, stating the reasons for the delay.

5.1. The right of access

The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and 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 or with whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- d) where applicable, the envisaged period of storage of the personal data or, if this is not possible, the criteria for determining that period;
- e) the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority;
- g) if the data were not collected from the data subject, any available information on their source;
- h) the fact that automated decision-making, including profiling, is taking place and, at least in these cases, the logic used and clear information about the significance of such processing and the likely consequences for the data subject.

Where personal data are transferred to a third country or an international organisation, the data subject is entitled to be informed of the appropriate safeguards for the transfer in accordance with Article 46 of the GDPR.

The data controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the data subject requests otherwise.

5.2. The right to rectification

The data subject shall have the right to obtain, at his or her request and without undue delay, the rectification by the controller of inaccurate personal data relating to him or her. Having regard to the purposes of the processing, the data subject shall have the right to obtain the rectification of incomplete personal data, including by means of a supplementary declaration.

5.3. Right to erasure ("right to be forgotten")

The data subject shall have the right to obtain from the controller the erasure of personal data relating to him or her without undue delay at his or her request, and the controller shall be obliged to erase personal data relating to him or her without undue delay if one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- c) the data subject 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 must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- f) personal data is collected in connection with the provision of information society services".

If the controller has disclosed the personal data and is required to delete it as described above, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that the data subject has requested the deletion of the links to or copies or replicas of the personal data in question.

Erase may be refused if the processing is necessary (i) for the exercise of the right to freedom of expression and information, or (ii) for compliance with an obligation under applicable law that requires the controller to process personal data or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (iii) necessary for reasons of public interest in the sphere of public health'; (iv) necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes where the right of erasure would be likely to render impossible or seriously impair such processing; and (v) necessary for the establishment, exercise or defence of legal claims.

5.4. Right to restriction of processing

The data subject shall have the right to obtain, at his or her request, the restriction of processing by the controller if one of the following conditions is met:

- a) the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the controller to verify the accuracy of the personal data;
- b) the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- c) the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- d) objected to the processing; in this case, the restriction shall apply for the period until it is established whether the legitimate grounds of the controller override those of the data subject.

If the processing is restricted, such personal data, except for storage, may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of Hungary.

The controller shall inform the data subject at whose request the processing has been restricted in advance of the lifting of the restriction.

5.5. The right to protest

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time, to the processing of his or her personal data based on Article 6(1)(e) or (f), including profiling based on those provisions, by sending a request to the contact details of our company indicated in point 2. In this case, the controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

5.6. The right to data portability

The data subject shall have the right to receive personal data relating to him or her which he or she has provided to a controller in a structured, commonly used, machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which he or she has provided the personal data, if:

- a) the processing is based on consent or on a contract; and
- b) the processing is carried out by automated means.

In exercising the right to data portability, the data subject has the right to request, where technically feasible, the direct transfer of personal data between controllers.

5.7. Right to legal redress

If the data subject considers that the controller has infringed the applicable data protection requirements in the processing of his or her personal data, the data subject may.

- a) may lodge a complaint with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf. 9.; e-mail: ugyfelszolgalat@naih.hu ; website: www.naih.hu), or
- b) have the right to apply to the courts, which will rule on the matter out of turn, in order to protect your data. In such a case, you are free to choose whether to bring your action before the competent court in the place where you reside (permanent address) or stay (temporary address) or where the controller is established. You can find the court of your domicile or residence at <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>. According to our company's registered office, the Metropolitan Court of Budapest has jurisdiction to hear the lawsuit.