

Privacy Notice

For the Career Development Programme

1 General provisions and contact details

This Privacy Notice (hereinafter referred to as: 'Notice') applies to the personal data collected and processed by Boston Consulting Group Szolgáltató Kft. (hereinafter referred at as: 'Controller') about You under the Career Development Programme.

Name: Boston Consulting Group Szolgáltató Kft.

Registered office: Piarista köz 2, H-1052 Budapest

Phone: +36 1 888 0200

Fax: +36 1 235 90 10

Website: www.prospectsinhungary.com

Contact details of the Data Protection Officer: dataprotectionoffice@bcg.com

The Controller transfers the personal data collected to the following organisations according to the needs of the participants for further processing in accordance with paragraph 5 of this Notice. For more information about the processing activities of such organisations, please see the below contact details:

Name	Registered office	Contact details
Integrom Program Public Nonprofit Kft.	Piarista köz 2, H-1052 Budapest	http://integrom.hu/adatkezesi-tajekoztato/
FREEASY Korlátolt Felelősségű Társaság	Körkemence utca 8, H-9023 Győr	https://app.briefly.work/pdf/briefly_adatvedelmi_en.pdf?_gl=1*1r7euiP*_ga*MTYxNzA4NzcwNS4xNjY1NDc5MTQ4*_ga_YVCPSYK0ZH*MTY2OTgyNjI0Ny43LjAuMTY2OTgyNjI0S40OC4wLjA
ERSTE BANK HUNGARY Limited Liability Company	Népfürdő utca 24-26, H-1138 Budapest	https://www.erstebank.hu/hu/adatkezesi
Expat World Tanácsadó és Szolgáltató Korlátolt Felelősségű Társaság	Határőr út 23/B, H-1122 Budapest	office@expatworld.hu
Green Fox Academy Korlátolt Felelősségű Társaság	Andrássy út 66, H-1062 Budapest	https://global-uploads.webflow.com/598435743262c800013158eb/619cc11d85a3c9c250d6d04d_210906%20honlap%20adatkezel%C3%A9si%20t%C3%A1j%C3%A9koztat%C3%B3.docx.pdf
ingatlan.com Zártkörűen Működő Részvénytársaság	Fény utca 16, H-1024 Budapest	https://info.ingatlan.com/wp-content/uploads/2022/05/Adatvedelmi_szabalyzat_ingatlancom_20220517.pdf

Randstad Hungary Személyzeti Közvetítő és Szolgáltató Korlátolt Felelősségű Társaság	Dózsa György út 146-148, building A/3, H-1134 Budapest	https://www.randstad.hu/adatvedelmi-nyilatkozat-es-felhasznalasi-feltetelek/
From Streets to Home Association	Baross utca 112/1/4, H-1082 Budapest	info@utcarollakasba.hu
WHC Személyzeti Szolgáltató Korlátolt Felelősségű Társaság	land registry number 035/2, H-8912 Nagypáli	https://whc.hu/adatkezeles

2 Legislation providing legal grounds for the processing

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as: 'Privacy Act')
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

3 Principles of processing

Personal data must be processed in a lawful and transparent manner, ensuring fairness towards the individuals whose personal data are being processed (*'lawfulness, fairness and transparency'*).

Personal data may be processed only for specified and legitimate purposes, where it is necessary for the exercising of certain rights and fulfilment of obligations. The purpose of processing must be satisfied in all stages of data processing operations; recording and processing of personal data shall be done under the principle of lawfulness and fairness (*'purpose limitation'*).

The personal data processed must be essential for the purpose for which it was recorded, and it must be suitable to achieve that purpose. Personal data may be processed to the extent and for the duration necessary to achieve its purpose (*'data minimisation'* and *'storage limitation'*).

The Controller must ensure that personal data are accurate and kept up-to-date, and that inaccurate personal data are corrected (*'accuracy'*).

The Controller must install appropriate technical and organisational safeguards that ensure the appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage (*'availability, integrity and confidentiality'*).

4 Definitions

Personal data means 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, an identification 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.

Special data

- a) means personal data on racial origin, nationality, political opinion or party affiliation, religious or philosophical beliefs, membership of representative organizations, sexual life;
- b) personal data concerning health, addictions or criminal record.

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Information means that the controller shall provide information to the data subject without undue delay and in any event within one month from the receipt of the request as to whether or not personal data concerning him or her are being processed, and, where that is the case, the data subject shall have the right to obtain access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.

Rectification means that the data subject shall have the right to obtain from the controller the rectification of personal data concerning him or her without undue delay at his or her request.

Erasure means that the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay at his or her request, and the controller shall have the obligation to erase personal data without undue delay if

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent, and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Restriction means that the data subject shall have the right to obtain from the controller the restriction of processing at his or her request - and means the marking of stored personal data with the aim of limiting their processing in the future.

Objection means a declaration by the data subject in which he or she objects to the processing of his or her personal data, and requests the processing to be stopped, and the processed data erased.

Data subject means any natural person who is identified or can be identified, directly or indirectly, on the basis of personal data.

Controller means the natural or legal person, public authority, agency or 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 such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law as well.

Processor means a natural person, a legal person or an entity without legal personality processing data on the basis of a contract concluded with the controller, including contracts concluded pursuant to legal provisions.

Third party means a natural person, a legal person or an entity without legal personality other than the data subject, controller or processor.

Processing means any operation or set of operations performed upon data, whether or not by automatic means, such as in particular collection, recording, organisation, storage, adaptation or alteration, use, retrieval, transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction, and blocking them from further use, photographing, sound and video recording, and the recording of physical attributes for identification purposes (such as fingerprints and palm prints, DNA samples and retinal images).

Transfer means making the data accessible to a specified third party.

Dissemination means making the data accessible to the public.

Data deletion means making data unrecognisable in a manner that their recovery is not possible.

Data destruction means the complete physical destruction of the data carrier recording the data. Technical manipulation of data means the technical operations involved in data processing, irrespective of the method and instruments employed for such operations and the venue where it takes place, provided that such technical operations are carried out on the data.

Pseudonymisation means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific natural person without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

5 Description of processing activities

5.1 description of the activity

During the Career Development Programme, the Controller and the following subsequent controllers assist the participants in promoting their economic integration and access to the labour market.

The Controller assesses whether the applicant is qualified to participate in the Career Development Programme on the basis of the CV submitted by the applicant. If the Controller decides that the applicant is qualified to participate, the name, phone number and e-mail address provided during the application procedure will be forwarded to the following subsequent controllers, in accordance with the participant's needs.

5.1.1 Scope of the data processed and the purpose of processing

Controller	Purpose of processing	Legal basis for processing	Categories of personal data
Boston Consulting Group Szolgáltató Kft.	Contact, Facilitating assistance by transfer to support organisations	Consent of the data subject	name, phone number, e-mail address
Boston Consulting Group Szolgáltató Kft.	Deciding if the applicant is qualified to participate in the Programme	Consent of the data subject	Information provided in the CV (name, experience)
Integrom Program Public Nonprofit Kft.	Contact, Facilitating assistance by transfer to support organisations	Consent of the data subject	name, phone number, e-mail address, Information provided in the CV
FREEASY Korlátolt Felelősségű Társaság	Contact, Assistance in relation to adult education	Consent of the data subject	name, phone number, e-mail address
ERSTE BANK HUNGARY Limited Liability Company	Contact, Assistance in relation to Job Placement, Housing Allowance	Consent of the data subject	name, phone number, e-mail address
Expat World Tanácsadó és Szolgáltató Korlátolt Felelősségű Társaság	Contact, Assistance in relation to Installation Allowance	Consent of the data subject	name, phone number, e-mail address
Green Fox Academy Korlátolt Felelősségű Társaság	Contact, Assistance in relation to Adult Education, Job Placement	Consent of the data subject	name, phone number, e-mail address
ingatlan.com Zártkörűen Működő Részvénytársaság	Contact, Assistance in relation to Housing Allowance	Consent of the data subject	name, phone number, e-mail address
Randstad Hungary Személyzeti Közvetítő és Szolgáltató Korlátolt Felelősségű Társaság	Contact, Assistance in relation to Business Prospecting, Job Placement	Consent of the data subject	name, phone number, e-mail address
From Streets to Home Association	Contact, Assistance in relation to Housing Allowance	Consent of the data subject	name, phone number, e-mail address
WHC Személyzeti Szolgáltató Korlátolt Felelősségű Társaság	Contact, Assistance in relation to Installation Allowance, Job Placement, Housing Allowance	Consent of the data subject	name, phone number, e-mail address

If you no longer wish to participate in the Career Development Programme, you have the right to withdraw your consent to the use of your first and last name, phone number, e-mail address and CV any time by notifying the Controller at info@prospectsinhungary.com.

5.1.2 Duration of processing

The Controller processes the personal data provided by You during your participation in the Career Development Programme, but will delete it after one year at the latest or in case of withdrawal of the consent.

5.2 Access to data, processors

The mentor participating in the Career Development Programme assigned to you by the Controller and the other controllers specified above may have access to your data, as set out in paragraph 5.1.1.

The Controller does not use external processors for data processing.

6 Rights related to the processing of personal data

6.1 The right to request information

Using the contact details provided in paragraph 1, you may request in a written form the Controller to provide information about the following:

- which personal data,
- on what legal basis,
- for what purpose,
- from what source,
- how long will be processed,
- to whom, when, under what legislation, to which personal data the Controller has given access or to whom it has transferred your personal data.

The Controller shall fulfil your request within 30 days by sending a letter to the address you have provided.

6.2 Right to rectification

Using the contact details provided in paragraph 1, you may request in a written form the Controller to modify any of your data (for example you might change your e-mail address at all times). The Controller shall fulfil your request within 30 days and shall notify you by sending a letter to the address you have provided.

6.3 Right to erasure

Using the contact details provided in paragraph 1, you may request in a written form the Controller to erase your personal data.

If the Controller is obliged by the legislation or by one of our internal policies to continue the storage of the personal data, the Controller may reject the request for erasure. Such cases include, for example, if the deadline for filing set forth in the internal policy has not expired.

However, if no such obligation exists, the Controller shall fulfil your request within 30 days and shall notify you by sending a letter to the address you have provided.

6.4 Right to blocking

Using the contact details provided in paragraph 1, you may request in a written form the Controller to block your personal data. The blocking lasts until the reason stated by You requires storage of the data.

You may request the blocking of your data if, for example, you believe that your application has been unlawfully handled by the Controller, but due to the administrative or legal procedure initiated by you, the Controller should not cancel your application. In this case, the Controller will continue to store the personal data (for example, your application) until contacted by the authority or court, and the data shall be erased afterwards.

6.5 Right to object

Using the contact details provided in paragraph 1, you may object to processing in a written form if the Controller intends to transfer or use the personal data for direct business making, research of public opinion or scientific research. For example, you may object to the Controller using your personal data for scientific research without your consent.

You may also object to processing if you consider that the processing is only necessary for compliance with a legal obligation to which the Controller is subject or for the purposes of the legitimate interests pursued by the Controller, except for processing based on a statutory mandate. For example, you shall not object to the transfer of your application containing your personal data and the case file to the Archives in accordance with our internal policy on filing.

7 Data-security measures

The Controller shall implement and maintain appropriate technical and organisational measures to protect personal data against (i) unauthorised or unlawful processing and (ii) accidental loss, damage, destruction, alteration, unauthorised disclosure or access, in accordance with the provisions of Article 32(1) of the GDPR.

8 Legal remedies related to processing

8.1 Initiation of legal proceedings

If data are processed unlawfully, you may initiate a civil action against the Controller. The court shall have jurisdiction in the action. You may decide to bring the action before the court of your domicile or place of residence (for a list of courts and their contact details, see the link below <http://birosag.hu/torvenyszekek>).

8.2 Notifying the authorities

Anyone may initiate an investigation by making a report to the National Authority for Data Protection and Freedom of Information (www.naih.hu; H-1363 Budapest, P.O. box 9.; phone: +36 (30) 683-5969; +36 (30) 549-6838; +36-1-391-1400; fax: +36-1-391-1410; e-mail ugyfelszolgalat@naih.hu) on the grounds that an impairment of a right has occurred or the direct risk of thereof exists in connection with the exercise of rights related to the processing of personal data or to access to public data or to data public due to public interest.

9 Clause

The Data Controller reserves the right to amend its privacy notice. This may happen, in particular, if amendment is required by law. However, the amendment of processing shall not result in processing the personal data for a purpose other than those set out herein. The Controller shall publish such information on its website 7 days in advance.