

GhostMonitor's Recruitment Privacy Policy

With the present recruitment privacy policy (hereinafter: “**Policy**”), GhostMonitor Korlátolt Felelősségű Társaság (registered seat: 1132 Budapest, Victor Hugo utca 11-15. 4. em. A04010., Hungary, registration number 01-09-281497, EU tax number: HU25547380; hereinafter: “**Company**” or “**GhostMonitor**” or “**We**”) intends to ensure that it gathers, stores and handles data fairly, lawfully, transparently and with respect of individual rights. This Policy applies to the recruitment procedure of GhostMonitor and its parent company, GhostMonitor Inc. (a private limited company operating under the laws of State of Delaware [registered office: 2711 Centerville Road, Suite 400, City of Wilmington, County of New Castle, Delaware 19808, USA; registration number:6088550] in case of applicants in the European Union). This Policy gathers the Company's guidelines and principles for collecting, storing, using, processing and disclosing personal data regarding your application procedure(s).

The processing and collecting of personal data by the Company is according to the directly applicable laws of the European Union and the provisions of the Hungarian laws in effect. In case of personal data processing, *the Regulation (EU) 2016/679 of the European Parliament and of the Council* (hereinafter: “**GDPR**”; for relevant definitions and data processing principles please see Article 4 and 5 of the GDPR), *the Act CXII of 2011 on the Right to Informational Self-determination and Freedom of Information* (hereinafter: “**Freedom of Information Act**”), furthermore the recommendations and the data protection practice of the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter: “**NAIH**”) and the recommendations of the Article 29 Data Protection Working Party (hereinafter: “**WP29**”) shall apply.

As GhostMonitor determines the purposes and means of the processing of any personal data collected or received from you, the Company is a data controller of any personal data described in this Policy. You are the data subject related to the personal data that the Company receives during the application procedure.

The Company will keep the received personal data confidential and takes all necessary steps to secure data processing.

1 What kind of personal data does the Company process for what purpose and on which legal basis?

1.1 During the recruitment procedure

We process your personal data given in your application, especially in the curriculum vitae and cover letter.

Purpose of data processing: initiate an employment relationship / participation of the applicant in the Recruitment process of the Company

Legal basis of data processing: your consent and in order to take steps at your request prior to entering into employment relationship

1.2 In case of successful application

In case we decide to employ you, we will require you to send us your personal data enlisted in our form (such as full name, date and place of birth, mother's maiden name, nationality, permanent/temporary, mailing address, mobile phone number, private email address, ID card number, health care ID number, Tax ID number, highest degree [organisation's name, type and name of degree], bank name, bank account number, family status, [name, mother's maiden name, place and date of birth, health ID number of dependents], emergency contact name and phone number, tax benefits, status as "KATA" contractor), which will be sent to you, in order to prepare the employment contract to be concluded and report such data as prescribed by the law.

Purpose of data processing: to prepare the employment contract to be concluded and to take every necessary measure to establish the employment relationship.

Legal basis of data processing: your consent and performance of the employment contract to be concluded and compliance with the applicable legal obligation (such as taxation).

2 How long GhostMonitor retains your personal data?

GhostMonitor will retain your personal data for so long as it is needed to fulfill the purposes outlined in this Policy or until you withdraw your consent, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no longer or no legal basis to process your personal information, we will either delete or anonymize it.

GhostMonitor stores unsuccessful applications for no more than 6 months in order to reach out suitable applicants for future matching vacancies or until applicant withdraw his/her consent.

You may withdraw your consent at any time before the end of the 6 (six) months period - without affecting the lawfulness of processing based on your consent before its withdrawal - by sending an e-mail to the customer service gdp@recart.com or by a declaration addressed to the Company, sent by post to the registered seat of the Company.

3 Who has access to your personal data?

The visibility of personal data is restricted and will be accessible only by the relevant people at GhostMonitor who are taking care of your application. Except as expressly described below, we neither rent nor sell your information to other people or nonaffiliated companies. We may share your information only when We have your permission.

4 How does GhostMonitor store, share and disclose your personal data?

4.1 The Company may request data process service for processing the personal data. During the service of data process, the data processor shall abide under the present Policy, relevant legislations in force, furthermore the provisions of the existing contracts of the Company.

The Company uses the data process service [WS1] [ZM2] [ZM3] of the following companies from third (non-EU) states:

Name	Registered seat	Activity (data processing service)
Ghostmonitor Inc.	251 Little Falls Drive Wilmington, Delaware 19808 United States	Data recording, processing, storing and forwarding
Google LLC	1600, Amphitheatre Parkway Mountain View, CA 94043 United States	Data recording and forwarding
Webflow Inc.	208 Utah, Suite 210 San Francisco, CA 94103 United States	Data processing and storage

4.2 Any unauthorized collection, processing, or use of such data by employees of GhostMonitor is prohibited.

4.3 GhostMonitor only transfers personal data collected from the EU territory to a third-party having a registered seat outside the EU or the United States of America acting as a data processor without appropriate safeguards when it is necessary for the performance of the Recruitment procedure. GhostMonitor will make every effort to ensure that the personal data transferred is safe and secure and that the personal data is processed in a manner consistent with the GDPR.

5 Privacy Rights

5.1 **Right to be informed, Right of access and to rectification:** You have the right to obtain confirmation of whether or not We are processing personal data relating to you, have communicated to you such data so that you could verify its accuracy and the lawfulness of the processing and have the data corrected, amended or deleted where it is inaccurate or processed in violation of the GDPR.

5.2 **Right of erasure:** In certain circumstances, you may have a broader right to erasure of personal information that We hold about you – for example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that We may need to retain certain information to comply with our legal obligations.

5.3 **Right to object to processing:** You may have the right to request GhostMonitor to stop processing your personal data.

5.4 **Right to restrict processing:** You may have the right to request that We restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information We hold about you is inaccurate or unlawfully held).

5.5 **Right to Data Portability:** In certain circumstances, you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that We transfer the personal information to another data controller without hindrance.

5.6 **Right to remedy:** You may exercise your rights described above by email sent to gdpr@recart.com or by a declaration addressed to the Company, sent by post to the registered seat of the Company.

If you don't agree with the decision of the Company, you can turn to court or to the NAIH (registered seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C., Hungary, Website: www.naih.hu), or to any other supervisory authority of the European Union Member State.



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6 Modifications to this Policy

Due to the ongoing changes in the law, data practices will change from time to time. Thus, GhostMonitor reserves the right to alter or modify this Policy when it is necessary. Your privacy will not be reduced without your consent. If you have any specific concerns not addressed in this Policy, please see the next phrase.

The present Policy shall enter into force on March 27, 2019

If you have any further questions regarding data protection or our Policy, please write to our following address: gdpr@recart.com.