



AIMOTIVE

DATA PROTECTION POLICY

in connection with employee candidates at Almotive Kft.

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1. The purpose and scope of this policy

The purpose of this policy is to set out the terms and conditions under which **Almotive Informatikai Korlátolt Felelősségű Társaság** (hereinafter: “**Almotive**”) as data controller may process information in connection with any person applying (directly or through any agency) for employment at Almotive or Almotive’s affiliates (hereinafter: “**Applicant**”) and to inform Applicants about the details of such data processing.

Almotive is dedicated to protecting privacy and personal data. The information provided by the Applicant to Almotive or gathered by Almotive in respect of the Applicant inevitably includes, by the very nature of the selection process, personal data. The rules followed by Almotive about the processing of such data and the rights and remedies of Applicants in connection with Almotive’s processing of their personal data are set forth in this policy.

This policy covers the processing of Applicants’ personal data by Almotive in connection with the selection process from the Applicant’s application for work in general or for a specific position at Almotive or any Almotive affiliate and shall apply to all Almotive personnel involved in the selection process, including officers and directors.

In the event that a third party recruitment agency or other service provider is involved in the recruitment for positions at Almotive or Almotive’s affiliates, the processing of personal data by such third party will be the responsibility and liability of such third party, which falls outside the scope of this policy and shall be subject to the privacy laws and the rules regarding protection of personal data (including the third party’s policies and procedures), as applicable.

2. Legal basis of data processing

For the purposes set out in section 4 of this policy, Almotive collects and processes the information (including personal data) listed in section 5 of this policy from and about the Applicant and stores it in its files (which may include written, printed and electronic form).

BY SUBMITTING, WHETHER DIRECTLY OR INDIRECTLY, AN APPLICATION TO AIMOTIVE OR ITS AFFILIATES, APPLICANT EXPRESSLY ACKNOWLEDGES AND GIVES HIS/HER CONSENT TO AIMOTIVE’S PROCESSING OF APPLICANT’S PERSONAL DATA UNDER THE TERMS AND CONDITIONS OF THIS POLICY.

The legal basis of the processing of Applicant’s personal data under this policy is the Applicant’s informed consent under Section 5 (1) a) of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: “**Data Protection Act**”). The Applicant’s application at Almotive in order to initiate a selection process for employment at Almotive constitutes a customer relationship for the purposes of section 65 (3) a) of the Data Protection Act and, as such, is exempt from registration with the data protection register kept by the National Authority for Data Protection and Freedom of Information (hereinafter: “**NDPA**”).

With respect to the collection of personal data regarding Applicants applying for positions at Almotive’s affiliates, Almotive registered itself with the data protection register under number [in progress].

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3. Details of the data controller and data processor

The data controller in respect of personal data handled under this policy is as follows:

name: Almotive Informatikai Korlátolt Felelősségű Társaság
seat: 1025 Budapest, Szépvölgyi út 22.
company reg. no.: 01-09-208015
tax no.: 25316663-2-41
telephone no.: + 36 1 770 7234
website: www.aimotive.com
e-mail: info@aimotive.com
primary contact: Head of HR Department

Personal data processed by Almotive under this policy may be accessed by the following persons at Almotive (as applicable from time to time):

- managing director;
- person exercising the Employer's rights;
- head of HR;
- head of legal;
- head of the relevant unit which the Applicant's application relates to;
- IT department.

Almotive shall remain the sole data controller in respect of the personal data handled under this policy. Almotive shall not transfer personal data under this policy to any third party data controller or data processor, except for Almotive's affiliates. In the event that the transfer of the Applicant's personal data to another Almotive affiliate operating in a non-EEA country becomes necessary, such transfer shall be (i) limited to the personal data in respect of the operation of the relevant Almotive affiliate and the relevant Almotive affiliate shall not have access to other personal data of Applicants (e.g. personal data of Applicants relating to Almotive or another Almotive affiliate), and/or (ii) subject to a model contract under the applicable Decisions of the European Commission that provide adequate safeguards with respect to the protection of the privacy and fundamental rights and freedoms of Applicants and as regards the exercise of the corresponding rights.

4. Purpose of data processing

In connection with selecting Applicants for a given position, Almotive may process Applicants' data for the following purposes:

- Establishment of the Applicant's qualifications for a certain position at Almotive or at its Affiliates;
- Establishment of the Applicant's medical fitness for a certain position at Almotive or at its Affiliates;
- Establishment of the Applicant's work history and eligibility for work at Almotive or at its Affiliates;
- Making an offer to an Applicant with respect to a prospective employment relationship with Almotive or with its Affiliates;

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- Maintenance of database consisting of Applicants' data for recruitment purposes;
- Career and professional development and talent management.

5. Information collected

Almotive may process the following data of Applicants in connection with the selection process and the maintenance of Applicants' database:

- Full name;
- Place and date of birth;
- Home address and/or other contact address;
- Phone number(s);
- E-mail address(es);
- Qualifications, education, work history, certificates on lack of criminal records (if necessary), curriculum vitae (including photograph);
- Job title/position, full time or part time status applied for;
- Data of previous employment;
- Data of work and residence permits with respect to the relevant place of work;
- Correspondence between Almotive and the Applicant;
- The contents of previous applications.

6. Source of information collected

In general, Almotive collects the personal data under this policy directly from the Applicant or by receiving the relevant data from a third party recruitment agency. In case of Applicants applying for positions at another relevant Almotive affiliate (as applicable) Almotive receives the Applicants' personal data from the relevant Almotive affiliate necessary for the purposes specified herein under a specific agreement between Almotive and the relevant Almotive affiliate providing for adequate protection of personal data.

Following the submission of Applicant's application to Almotive, Almotive may search for information from public sources (such as the Internet) in order to verify information submitted by Applicant or to gather additional information that is relevant for the relevant application or position. This may include review of Applicant's public profile on social media networks (such as LinkedIn). However, Almotive will not download or forward information shared by the Applicant on social media networks.

7. Use and confidentiality of information

Almotive shall use the personal data collected during the selection process solely for the purposes set out in section 4 above. If, for any reason, an Applicant is not selected for a given position immediately following his/her application, Almotive may approach that Applicant later in case of vacancies in positions for which the Applicant is otherwise suitable using the database of information collected from Applicants during the relevant selection processes.

Almotive shall keep confidential, and not disclose to any third party, the Applicant's personal data processed hereunder, unless expressly authorized to do by the Applicant on a case by case basis.

8. Duration of the processing of Applicants' personal data

Almotive may process Applicants' personal data from the date of their application up to and until the earlier of

- (i) the establishment of an employment relationship by and between Almotive and the Applicant (in which case the further processing of the Applicant's personal data will be subject to the data protection rules pertaining to the employment relationship); or
- (ii) 5 years following the Applicant's first application at Almotive;

but, in any event, not longer than necessary for the purposes of the processing defined in section 4 above. Prior to the expiry of the aforementioned periods, the Applicant may request deletion of his/her personal data under section 9 below.

9. Data Security

Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorized purposes) of the personal data. Confidentiality means that only people who are authorized to use the data can access it. Integrity means that personal data should be accurate and suitable for the purpose for which it is processed. Availability means that authorized users should be able to access the data if they need it for authorized purposes.

Accordingly, Almotive will ensure that appropriate measures are taken against unlawful or unauthorized processing of personal data, and against the accidental loss of, or damage to, personal data. These principles will be enforced by putting in place appropriate hardware and software based security measures (including physical entry and system access control, locks, alarms, firewalls, etc.). Almotive has in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

10. Rights and remedies

In connection with Almotive's processing of personal data hereunder the Applicant may:

- (i) request information about the processing of his/her personal data;
- (ii) request rectification of his/her personal data;
- (iii) request the erasure or blocking of his/her personal data; and
- (iv) object to the processing of his/her personal data.

Any inquiries including requests to access, correct, supplement, delete, block and/or object to the processing of personal data may be addressed to Almotive's HR department. All legal declarations and enquiries regarding the enforcement of rights related to the processing of personal data shall be made in writing and include a description of all relevant facts and circumstances necessary to identify the issue. Inquiries and requests will be carefully processed and generally replied within 15 days.

In the event of an infringement of rights related to the processing of personal data, the Applicant may address the Hungarian National Authority for Data Protection and Freedom of Information

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(postal address: 1530 Budapest, Pf.: 5.; address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; telephone: +36 (1) 391-1400; facsimile: +36 (1) 391-1410; e-mail: ugyfelszolgalat@naih.hu; web: <http://naih.hu>) or to the competent court (including the county tribunal having jurisdiction for the place of residence). In any event, it is advisable that in order to resolve the issue the Applicant send any complaints or enquiries to Almotive first prior to addressing the authorities.

The data processing described herein is subject to registration with the data protection register kept by the National Authority for Data Protection and Freedom of Information (hereinafter: "NDPA"). Prior to collecting Subscriber's data Almotive registered itself with the data protection register under No. **NAIH-120691/2017**.

11. Miscellaneous

This policy takes effect on the day on which it is issued and remains in force until its withdrawal or replacement by Almotive. Almotive shall review this policy on a regular basis and align it with respect to the changed circumstances, as appropriate.