

## DATA PROTECTION AND DATA PROCESSING

### PRIVACY NOTICE

#### I. PRESENTATION OF THE DATA CONTROLLER

**Lurdy-Ház Bevásárló- és Irodacentrum Korlátolt Felelősségű Társaság** (Lurdy-Ház Shopping and Office Centre Limited Liability Company) (hereinafter: the "**Controller**" or the "**Company**") has adopted the following data protection privacy notice in order to ensure the lawfulness of its internal data processing operations and the rights of data subjects.

Name of the Controller:	<b>Lurdy-Ház Bevásárló- és Irodacentrum Korlátolt Felelősségű Társaság</b>
Company registration number of the Controller:	<b>Cg.01-09-566490</b>
Registered seat of the Controller:	<b>1097 Budapest, Könyves Kálmán krt. 12-14.</b>
E-mail address of the Controller:	<b>adatvedelem@lurdyhaz.hu</b>
Representatives of the Controller:	<b>Csaba Szilágyi, Managing Director and Ákos Török, Chief Executive</b>

The Controller processes personal data in accordance with all applicable legislation, in particular the following:

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: the "**Infotv.**");
- Regulation (EU) 2016/679 of the European Parliament and of the Council 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) (hereinafter: the "**Regulation**" or the "**GDPR**").

The Controller treats personal data confidentially and takes all necessary IT, information security and other technical and organisational measures to promote the secure processing and preservation of the confidentiality of data.

#### **Definitions**

The definitions used in this privacy notice correspond to the definitions set out in Article 4 of the Regulation, supplemented at certain points by the interpretive provisions of Section 3 of the Infotv.

Where this notice refers to data or data processing, it shall be understood as referring to personal data and the processing thereof.

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#### **II. PURPOSE OF DATA PROCESSING: Conducting the recruitment process, assessing job applications**

The Company publishes job advertisements primarily through the Profession.hu job portal for recruitment purposes, and in certain cases cooperates with external headhunting firms under service agreements in order to fill specific positions. It is important to emphasise that the Company only accepts targeted applications — that is, it only processes applications submitted for specific, currently advertised positions. Unsolicited applications ("drop-in CVs") are not accepted by the Company.

During the selection process, the Controller carries out data processing in respect of the personal data of applicants.

### **Purpose of data processing**

The primary purpose of data processing is the professional and efficient conduct of the selection process necessary for filling the advertised position. In this context, the Controller forms an assessment of the applicants' professional experience, educational qualifications, competences and personal attributes on the basis of the personal data provided by the applicants — in particular the information contained in the curriculum vitae, cover letter or other documents. The purpose of data processing is to enable the Controller, taking this information into account, to select the applicant who is most suitable for the position in question and is capable of contributing to the successful operation of the company in the long term.

During data processing, the Controller processes only data that is relevant to and necessary for the selection procedure, in accordance with the applicable legal provisions, with full respect for the rights of data subjects.

### **Personal data processed**

The Controller processes exclusively the personal data voluntarily submitted by the data subject in connection with the job application. This includes primarily the information contained in the CV submitted by the applicant, and — if provided — in the cover letter, such as the applicant's name, contact details (telephone number, e-mail address), professional experience, educational qualifications, language skills, competences, as well as any photograph that may appear in the CV, etc. The data subject may also communicate other personal data voluntarily shared by him or her, which likewise falls within the scope of data processing.

Where a specific qualification, licence or degree is a prerequisite for filling the advertised position, the Controller examines the relevant data during the selection process. It is important to emphasise that only data necessary for assessing the application is processed. If the data subject sends documents or data that are not necessary for the selection, the Controller shall delete or destroy them without delay.

### **Legal basis for data processing**

The legal basis for the processing of personal data is Article 6(1)(a) of the Regulation, i.e. the consent of the data subject. By submitting his or her application materials (curriculum vitae, cover letter, other documents), the applicant consents to the Controller processing the data contained therein for the purposes of the selection process.

### **Source of personal data**

The source of personal data is the data subject who applies for the advertised position.

Where the Controller engages an external headhunting firm during the selection process, the applicants' personal data is transmitted to the Controller by the headhunting firm. In this case, the headhunting firm acts as an independent data controller and processes the personal data in accordance with its own privacy notice before transmitting them to the Controller.

### **Access to personal data**

Personal data are processed exclusively by those employees of the Controller who have the authority to make recommendations or decisions in connection with filling the advertised position.

If the data subject submits his or her application electronically, we use the services of the following data processor:

**AX Technology Kft.** (registered seat: 1194 Budapest, Hamu utca 5.) — The data processor provides IT services to the Controller and participates in the operation of the e-mail system.

The data processor may process the personal data of data subjects solely for the purpose defined by the Controller and set out in the contract, and in accordance with the Controller's instructions; the processor has no independent decision-making authority regarding the processing. The data processor has undertaken confidentiality obligations and contractual guarantees regarding the preservation of personal data that come to its knowledge in the course of performing its duties.

### **Transfer of personal data to a third country or international organisation**

The Controller does not transfer personal data to any third country or international organisation.

### **Duration of personal data processing**

The Controller processes personal data until the withdrawal of consent; in the absence thereof, personal data are retained only until the position is definitively filled (i.e. until the end of the selected candidate's probationary period).

### **Automated decision-making and profiling**

Neither automated decision-making nor profiling takes place during data processing.

### **Provision of personal data**

The provision of personal data is not mandatory; however, it is a fundamental prerequisite for the assessment of the application and for participation in the selection process.

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## **III. RIGHTS OF THE DATA SUBJECT IN RELATION TO DATA PROCESSING**

### **Right to information**

The data subject has the right to receive information in connection with data processing, which the Controller fulfils by making this privacy notice available.

### **Processing based on consent**

**Where the legal basis for data processing is the consent of the data subject, the data subject is entitled to withdraw his or her consent to data processing at any time.** It is important to note, however, that the withdrawal of consent may only relate to data for which there is no other legal basis for processing. Where there is no other legal basis for the processing of the personal data concerned, the Controller shall permanently and irreversibly delete the personal data following the withdrawal of consent. Pursuant to the Regulation, the withdrawal of consent shall not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

### **Right of access**

Upon request by the data subject, the Controller shall at any time provide information as to whether processing of the data subject's personal data is in progress, and if so, shall grant access to the personal data 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, including in particular recipients in third countries or international organisations;
- d) the envisaged period for which the personal data will be stored, or, if that is not possible, the criteria used to determine that period;
- e) the data subject shall also be informed of the right to request from the Controller the rectification, erasure or restriction of processing of personal data relating to him or her, and to object to the processing of such personal data;
- f) the data subject shall also be informed of the right to lodge a complaint with a supervisory authority or to initiate court proceedings;
- g) where the personal data were not collected directly from the data subject, all available information as to the source of the data;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The Controller shall also, upon request, provide the data subject with a copy of the personal data undergoing processing.

### **Right to rectification of personal data**

The data subject has the right to obtain from the Controller, without undue delay, the rectification of inaccurate personal data relating to him or her. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Where a request is made for the rectification (amendment) of data, the data subject must substantiate the accuracy of the amended data, and must also verify that the request is made by the person entitled to do so. Only in this way is the Controller able to assess whether the new data is accurate and, if so, whether it may amend the previous data.

The Controller further draws attention to the fact that the data subject should report any change in his or her personal data as soon as possible, thereby facilitating lawful data processing and the exercise of the data subject's rights.

### **Right to erasure**

Upon the request of the data subject, the Controller shall be obliged to erase the personal data relating to the data subject without undue 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 Controller;
- b) where processing is based on consent, the data subject withdraws the consent on which the processing is based, and there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for the purposes of direct marketing;
- d) the personal data have been unlawfully processed by the Controller;
- e) the personal data must be erased for compliance with a legal obligation under Union or Member State law applicable to the Controller;
- f) the personal data were collected in relation to the offer of information society services.

### **Right to restriction of processing**

The data subject has the right to obtain from the Controller the restriction of processing where one of the following applies:

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

### **Right to object**

Where the legal basis for data processing is the legitimate interest of the Controller [Article 6(1)(f) of the Regulation], or where the processing is necessary for the performance of a task carried out in the exercise of official authority vested in the Controller [Article 6(1)(e) of the Regulation], the data

subject has 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, including profiling based on those provisions.

Where personal data are processed by the Controller for direct marketing purposes (such as the sending of newsletters), the data subject has the right to object at any time to the processing of his or her personal data for such purposes, including profiling insofar as it is related to such direct marketing. Where the data subject objects to the processing of personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

### **Legitimate interest assessment**

Where the legal basis for the processing of personal data is the legitimate interest of the Controller or of a third party pursuant to Article 6(1)(f) of the Regulation, we prepare a written "legitimate interest assessment" (balancing test) on the basis of Recital (47) and Article 5(2). The data subject may request this assessment by writing to [adatvedelem@lurdyhaz.hu](mailto:adatvedelem@lurdyhaz.hu).

### **Right to data portability**

The data subject has the right to receive the personal data relating to him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller, where:

- a) the processing is based on the data subject's consent or on a contract pursuant to Article 6(1)(b) of the Regulation; and
- b) the processing is carried out by automated means.

## **IV. PROCEDURE FOR EXERCISING THE RIGHTS OF THE DATA SUBJECT**

The data subject may exercise the above rights by sending an e-mail to [adatvedelem@lurdyhaz.hu](mailto:adatvedelem@lurdyhaz.hu), by postal letter addressed to the registered seat of the Controller, or in person at the Controller's registered seat. The Controller shall commence the examination and fulfilment of the data subject's request without undue delay following its receipt. The Controller shall inform the data subject of the measures taken in response to the request within 1 month of receipt. If the Controller is unable to comply with the request, it shall inform the data subject of the reasons for refusal and of his or her rights of redress within 1 month.

Within five years following the death of the data subject, the rights that were vested in the deceased during his or her lifetime as set out in this notice may be exercised by a person authorised by the data subject by means of a disposition for administrative purposes, or by a declaration made in a public document or a private document of full probative value filed with the Controller — if the data subject made more than one such declaration to a controller, the declaration made at the later date shall apply. If the data subject did not make a corresponding legal declaration, his or her close relative as defined in Act V of 2013 on the Civil Code shall also be entitled — even in the absence of such a declaration — to exercise the rights under Article 16 of the Regulation (right to rectification) and Article 21 (right to object), and — where the processing was already unlawful during the data subject's lifetime or the purpose of the processing ceased upon the data subject's death — the rights under Article 17 of the Regulation (right to erasure) and Article 18 (right to restriction of processing) that were vested in the deceased during his or her lifetime, within five years following the death of

the data subject. Where several close relatives are entitled to exercise such rights under this paragraph, the close relative who first exercises this entitlement shall be so entitled.

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## **V. RIGHT TO LEGAL REMEDY IN RELATION TO DATA PROCESSING**

In order to enforce his or her right to judicial remedy, the data subject may bring an action before a court against our Company if, in his or her opinion, our Company or a data processor acting on our behalf or under our instructions, or a joint controller, processes his or her personal data in breach of the provisions laid down in applicable legislation governing the processing of personal data or in a binding legal act of the European Union. The court shall act on an expedited basis in the case. The case falls within the jurisdiction of the regional court (*törvényszék*). The action may also be brought — at the data subject's choice — before the regional court of the data subject's place of residence or habitual abode, or before the regional court having jurisdiction over the registered seat of our Company (Court finder: <https://birosag.hu/birosag-kereso>).

Anyone may initiate an investigation against the Company by filing a report with the National Authority for Data Protection and Freedom of Information (**NAIH**) on the grounds that an infringement has occurred in connection with the processing of personal data, or that there is an imminent risk thereof, or that the Company restricts the exercise of the data subject's rights relating to data processing or refuses the data subject's request for the exercise of such rights. The report may be submitted at any of the following contact details:

### **Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)**

(National Authority for Data Protection and Freedom of Information)

Postal address: 1363 Budapest, Pf. 9.

Address: 1055 Budapest, Falk Miksa utca 9-11.

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

URL: <http://naih.hu>

Budapest, 25 March 2026