

DATA PROCESSING HANDOUT

1. Purpose of the handout

The purpose of this handout is to specify the data protection and management principles used in respect of the CVs, other attached documents thereto, received at **ALTEO Nyilvánosan Működő Részvénytársaság** (registered office: 1131 Budapest, Babér utca 1-5.; company registry number: Cg. 01-10-045985; hereinafter referred to as “**Company**” or “**Data Manager**”), and the data protection and management policy of the Company that it accepts as binding.

With this handout the Company complies with the prior information provision obligation according to Article 20 of Act CXII of 2011 on the Informational Self-determination and Freedom of Information (hereinafter referred to as “**Info Act**”).

Data protection registry number: NAIH-110578/2016.

2. Interpretative provisions

1. *Person Concerned or User*: natural person sending Personal Data to the Company who is identified or – directly or indirectly- could be identified based on the Personal Data;
2. *Personal Data*: data that can be connected to the Person Concerned – especially the name, identifier of the person concerned, and knowledge about one or more physical, physiological, mental, economic, cultural or social identity of theirs -, and the conclusion that can be drawn from the data concerning the Person Concerned;
3. *Special Data*:
 - a. personal data concerning racial origin, nationality, political opinion, political party allegiance, religious or other ideological conviction, trade union membership, sexual life,
 - b. personal data concerning health condition, pathological addictions, personal data concerning previous criminal record;
4. *Data of Public Interest*: information and knowledge recorded in any form or manner, managed by, or related to the activity of, or generated in connection with the performance of public duties of a body or person performing state or municipal tasks or other public tasks specified in legal regulations, not belonging to the group of Personal Data, regardless of the manner of its management, its being an individual piece of information or a compilation of data, in this regard relating especially to competence, jurisdiction, organizational structure, professional activity, its efficiency, the possessed type of data, the legal regulations governing the operation and management, concluded contracts;
5. *Consent*: the voluntary and definite expression of the will of the Person Concerned, based on appropriate information, and with which the Person Concerned gives their clear consent to the management – full or with regards to certain operations - of Personal Data related to them;
6. *Objection*: statement of the Person Concerned with which they object to the management of their personal data and request the termination of the data management or the deletion of the managed data;

7. *Data Manager*: the natural person or legal entity or unincorporated organization that determines the purpose of the management of data independently or together with others, makes and performs the decisions concerning Data management (including the tool that was used) or has the same performed by the Data Processor;
8. *Data Managements*: regardless of the used procedure, any operation performed on the data, or the entirety of the actions, in this regard especially gathering, recording, taking, organizing, storing, changing, using, polling, forwarding, disclosing, harmonizing or connecting, blocking, deleting and destroying data, and preventing the further use of data, preparing photographs, audio or video records, or recording physical attributes suitable for identifying the person (e.g. finger- or palm print, DNS sample and retinal images);
9. *Data forwarding*: making data accessible for specified third parties;
10. *Disclosure*: making data accessible for anyone;
11. *Deletion of data*: making data unrecognizable to the extent that restoration such data is no longer possible;
12. *Blocking data*: marking the data with an identification mark to limit the further management of said data in a final or temporary (for a specific time) manner;
13. *Destruction of data*: full physical destruction of the data carrier containing the data;
14. *Data processing*: performance of the technical tasks related to data management operations, regardless of the method and tool used for the performance of the operations and the place of application, provided that the technical task was performed on the data;
15. *Data Processor*: the natural person or legal entity or unincorporated organization that processes data based on a contract, including a contract concluded based on provisions of legal regulations;
16. *Dataset*: the entirety of data managed in one registry;
17. *Third party*: the natural person or legal entity or unincorporated organization that is not identical to the Person Concerned, the Data Manager or the Data Processor.

3. The purpose of data management

- 3.1 The purpose of data management is application to the job announced by the Company, evaluation of the application sent by the User, possible establishment of employment, and notifying the User about future job offers that suit the qualifications and professional experience of the User as per the judgment of the Company.
- 3.2 The Data Manager shall not use the Personal Data according to Item 7 and provided by the Person Concerned for purposes other than what is specified in Item 3.1. Disclosure of the Personal Data to Third Parties or to courts or other authorities –in lieu of a legal regulation providing otherwise – is only possible based on a court, official decision in this regard or based on the prior and express Consent of the User. Established subsidiaries of the Company, according to Item 2 of Section 3 (2) of Act 100/2000 on accounting and according to Annex 1 of this document do not qualify as unauthorized Third Parties; the User/Person Concerned gives their express and voluntary consent to forwarding data to them by accepting this handout. Annex 1 of this handout contains the list of the subsidiaries of the Company.

4. Legal basis for the Data Management

The Data Management is performed based on the voluntary statement of the User given in accordance with the Info Act, based on preliminary information, which statement contains the express consent of the User to the management of the CV sent by the User to the Company, the other attached documents, and all the Personal Data contained within, in compliance with this handout and the legal regulations. According to Item a) of Section 5 (1) of the Info Act the legal basis for the data management is the voluntary Consent of the Person Concerned.

5. Duration of the Data Management

The Company manages the Personal Data for the shortest period necessary to achieve the goal according to Item 3.1 only, until the position in question is fulfilled, for one (1) year after providing the Personal Data for the Data Manager, for sending notifications about future job offers. The Data Manager can manage the Personal Data of the Person Concerned as long as the goal of the Data Management persists. The Data Manager terminates the management of Personal Data if the deletion of the Personal Data of the User was requested based on Item c) of Article 14 of the Info Act.

6. Scope of the managed Personal Data

The Company only manages the CV of and sent by the User – and received by the Company - the other attached documents attached thereto, and the Personal Data contained within (qualifications, documents certifying language proficiency).

7. Principles of Data Management

7.1 Personal Data can be recorded and managed only for the purpose specified in Item 3, in accordance with the requirement of integrity and legality.

7.2 Personal Data can only be managed to the extent and for the period necessary for the realization of the goal.

7.3 The managed data shall be proportionate to the purpose of its management.

7.4 The Company agrees to manage Personal Data it obtained and manages with utmost consideration for the Info Act and the data management principles specified herein and shall not disclose such data to Third Parties not specified herein or unauthorized Third Parties, besides the Data Manager specified herein.

7.5 The Company only makes the personal data of the User available for third parties in exceptional cases, based on court, official decisions or legal regulations.

7.6 The Company obliges itself to take care of the security of the data. For this purpose, the Company shall take all the technical and organizational measures that ensure the protection of the recorded, stored or managed data, and to prevent the destruction, unauthorized access to and unauthorized modification of the same.

8. Provision about Personal Data

- 8.1 The User can request information about the management of their personal data from the Company at any time, in a registered-return receipted letter sent to the address of the Company or in an email sent to the address info@alteo.hu. Information requests sent by postal service as a letter are considered valid by the Company only if the identity of the User concerned can be clearly discerned from it. In the case of information requests sent by email the inquiry can only be considered valid if it is sent from an email address used when submitting the application.
- 8.2 In the case of inquiries the Company shall provide the necessary information to the Person Concerned within twenty-five (25) days at the most from receiving the inquiry.
- 8.3 The information is free. Information to be given to the person concerned can only be denied in the case of data management restrictions according to Section 9 (1) of the Info Act and in the cases specified in Article 19 of the Info Act.
- 8.4 If the Personal Data is false and the actual Personal Data is available for the Data Manager, the Data Manager corrects the Personal Data. Instead of deletion the Data Manager blocks the Personal Data if the Person Concerned requests it, or if it can be assumed based on the available information that the deletion would violate the rightful interests of the person concerned. Personal Data blocked in this manner can only be managed as long as the data management purpose excluding the deletion of the Personal Data persists. The Person Concerned and all those to whom the data was forwarded earlier for Data Management purposes shall be notified about the correction, blocking, marking and deletion. If the Data Manager does not comply with the request of the Person Concerned about the correction, blocking or deletion of the data, the Data Manager shall present the factual and legal reasons for denying the request about the correction, blocking or deletion in writing within twenty-five (25) days from receiving the request. In the case of denying the request about the correction, blocking or deletion the Data Manager informs the Person Concerned about the option of court legal remedy, or the option of turning to the Hungarian National Authority for Data Protection and Freedom of Information.

9. Data processing, data forwarding

The Company does not employ data processors in the course of Data Management.

The Company may forward the Personal Data to its established subsidiaries – according to Annex 1 – if the position in question is to be filled in at a subsidiary. In this case multiple data management is realized. If the User wishes to enforce any claims related to Data Management performed by a subsidiary of the Company, the Company accepts an obligation to forward the claim to the subsidiary.

10. Modifying the data management handout

The Company reserves the right to modify this data management handout at any time with its unilateral decision.

11. Options to enforce rights

- 11.1 The User may object to the management of their Personal Data in the cases specified in Article 21 of the Info Act. The Data Manager reviews the objection as soon as possible after the

submission of the request but within fifteen (15) days at the most, makes decision about its merits and informs the User about its decision in writing. After receiving the information or in the case of not receiving the information the Person Concerned has the right to file a claim at the competent court within thirty (30) days.

11.2 To enforce their rights, the User – besides the above- can turn to a court in accordance with the provisions of the Info Act and of Act V of 2013 on the Civil Code (hereinafter referred to as “CC”) which shall act in the case granting it priority. Judging the lawsuit belongs to the jurisdiction of the court. According to the choice of the Person Concerned the lawsuit can be initiated before the court according to the place of residence or according to the place of domicile of the Person Concerned.

11.3 The User may turn to the Hungarian National Authority for Data Protection and Freedom of Information with any questions regarding the management of their Personal Data (contacts: 1125 Budapest, Szilágyi Erzsébet fasor 22/C; mail address: 1530 Budapest, PO Box 5.).

11.4 In the case of questions regarding data management the employees of the Company may be contacted by the email address info@alteo.hu.

Annex 1:

Subsidiaries of the Company:

Company name	Registered office	Company registry number
ALTE-A Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-901186
ALTEO-Agria Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-904433
ALTEO-Depónia Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-906261
ALTEO-Hidrogáz Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-919643
ALTEO Energiakereskedő Zrt.	1131 Budapest, Babér utca 1-5.	Cg. 01-10-047253
ALTSOLAR Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-997686
Balassagyarmati Biogáz Erőmű Kft.	1131 Budapest, Babér utca 1-5.	Cg.01-09-998498
BC-Therm Kft.	1131 Budapest, Babér utca 1-5.	Cg.01-09-887812
CIVIS-Biogáz Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-938515
e-Wind Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-733622
EXIM-INVEST-BIOGÁZ Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-938516
Győri Erőmű Kft.	9027 Győr (5788/4. hrsz), Kandó Kálmán u. 11-13.	Cg. 08-09-019413
HIDROGÁZ Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-863661

Kazinc-Therm Kft.	3700 Kazincbarcika, Gorkij u 1.	Cg.05-09-009234
Kazinc-BioEnergy Kft.	1131 Budapest, Babér utca 1-5.	Cg.01-09-996064
Ózdi Erőmű Kft.	3700 Kazincbarcika, Gorkij u 1.	Cg.05-09-012217
Sinergy Kft.	1131 Budapest, Babér utca 1-5.	Cg.01-09-680396
Sinergy Energiakereskedő Kft.	1131 Budapest, Babér utca 1-5.	Cg.01-09-178667
Soproni Erőmű Kft.	9400 Sopron, Somfalvi u 3. (4303 hrsz).	Cg. 08-09-019412
SUNTEO Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-997687
Tisza-BioEnergy Kft.	1131 Budapest, Babér utca 1-5.	Cg.01-09-996062
Tisza BioTerm Kft.	1131 Budapest, Babér utca 1-5	Cg.01-09-965041
Tisza-Therm Kft.	3580 Tiszaújváros, Tisza út 1/D.	Cg.05-09-009230
Tisza-WTP Kft.	3580 Tiszaújváros, Ipartelep 2069/3	Cg.05-09-009864
VENTEO Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-897425
WINDEO Kft.	1131 Budapest, Babér utca 1-5.	Cg. 01-09-899444