

Data Protection Policy

The **Xlabs Hungary Korlátolt Felelősségű Társaság** (registered seat: 1065 Budapest, Révay köz 4.); company registration number: Cg. 01-09-184477; “xLabs”) hereby informs the job seekers, candidates whose personal data xLabs controls in the course of its recruitment activities (“Candidates”) on the personal data controlled by xLabs, the principles and practice of such data controlling and the rights and remedies of the Candidates in relation thereto.

1. The scope of the personal data, the purpose of and the duration of the data controlling

The purpose of the controlling of the personal data of the Candidates is the recruitment of the Candidates to the clients of xLabs. The Candidate may give consent to the controlling of personal data in respect of a specific job vacancy or in general for recruitment purposes.

xLabs may send newsletters to the Candidate which include professional content and exclusive positions

xLabs may send a gift box for the Candidate base on the expressed consent of the respective Candidate.

xLabs controls the following personal data of the Candidates:

Full name, email, mobile phone number, address, workplace, position / studies, age, nationality, Linkedin profile ID, CV, language skills, professional skills, education background, honours/awards, when is the earliest start date for the new position, if the Candidate bound by non-compete undertaking, current salary, salary expectations, if the Candidate is bound by a student agreement. For specific job vacancies further information/personal data might be provided, with the consent of the Candidate.

xLabs does not control sensitive, special category data, only when it is needed for specific job opening and always subject to the prior consent of the Candidate.

xLabs controls personal data of the Candidates until request for erasure by the Candidate, or maximum until the time necessary for the purpose of the data controlling, which occurs earlier. The xLabs revises regularly if the controlled personal data is necessary for the performance of its purpose.

xLabs makes its best effort to keep up-to-date personal data of the Candidates. In order to ensure this goal, the xLabs encourages the Candidates to notify xLabs on the change of their personal data provided to xLabs. xLabs also contacts the Candidate from time to time to update the personal data of the Candidates controlled by xLabs either by e-mail or phone call.

2. The legal basis of the data controlling

The legal basis of the data controlling is the consent of the Candidate as data subject under Article 5 (1) a.) of Act CXII of 2011 on the Right to Informational Self-determination and Freedom of Information ("Data Protection Act") and Article 6 (1) a) of the 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 ("GDPR"). The personnel of xLabs may contact potential Candidates based on their publicly available contact data in order to obtain the consent of the potential Candidate to control his/her personal data for the purposes and manner set out in this Policy. The legal basis of such contact is the legitimate interest of the xLabs based on Article 6 (1) b.) of the Data Protection Act and Article 6 (1) f) of the GDPR.

Following the registration at the www.xLabs.hu website as a jobseeker and/or providing the data under Section 1 to xLabs in any form (by phone/e-mail) xLabs will request the expressed consents to the controlling of his/her personal data in line with this policy, in the absence of such consent xLabs will not process such the data.

3. Access to data, data transfer, security, data processing

The personnel of xLabs have access to the personal data. The personnel of the xLabs may contact you to inform you about new job vacancies or update your personal data controlled by the xLabs.

xLabs employees may send a newsletter to the Candidate with relevant professional content and exclusive positions

The xLabs transfer the personal data of the Candidate to those client(s) of the xLabs that has openings for positions that the Candidate applies to, but only those personal data that is necessary for the application to the respective vacancy. The xLabs transfers the personal data of the Candidate to its client with the specific consent of the Candidate given either by phone verbally or by e-mail. Some client(s) of xLabs may reside outside the EU, in such case xLabs informs the Candidate on the country where the personal data of the Candidate would be transferred, and only transfers the personal data of the Candidate based on his/her specific consent for this data transfer.

The purpose of this data transfer is that if in the sole discretion the xLabs's client the Candidate is deemed fit for the respective vacancy, xLabs's client can approach the Candidate with job offers and enter into an employment agreement or similar agreement for the provision of work. xLabs transfers the personal data of the Candidate to its clients with the condition that they can control the transferred personal data for the above purpose and until 12 months if they do not enter into an agreement with the respective Candidate. xLabs's client is a separate data controller with respect to the transferred personal data, xLabs shall not be liable for any breach committed by its client.

The xLabs processes the personal data by automatized methods and uses the following data processing services:

Traffit (<https://xLabs.traffit.com/>).

xLabs stores all personal information on Traffit's (<https://xLabs.traffit.com/>) German AWS servers. Security details of the servers can be found at <https://aws.amazon.com/security>. Traffit's intrusion protection systems are regularly tested, any errors detected are repaired immediately, and their software solutions always use the latest possible security solutions, so their system is equipped against intrusions. Traffit backs up all data every 24 hours and stores all logs for 30 days.

xLabs acts with the outmost care in order to prevent data protection incidents. In the case of any data protection incidents, xLabs provides maximum transparency to the Candidates and the acting authorities.

4. Cookies

The website does not use cookies.

5. Rights and remedies

The Candidate may object to the controlling of his personal data even after providing them, the Candidate may request correction of the provided personal data, may request further information on the controlling of his/her personal data and may also request the transfer of his/her personal data to a third party. If the Candidate request deletion or correction of its personal data, xLabs will arrange without delay the deletion or correction of the transferred personal data. Following the erasure of the requested data, xLabs does not have access to such data, the fact of the erasure is recorded by Traffit (<https://traffit.com/>).

In case of infringement of personal data, under the Data Protection Act, the GDPR and the Civil Code (act V of 2013) the Candidate may:

i. turn to the Hungarian National Authority for Data Protection and Freedom of Information; (seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; postal address: 1530 Budapest, Pf.: 5.; e-mail: ugyfelszolgalat@naih.hu; telefon: +36 (1) 391-1400; honlap: www.naih.hu), or

ii. file a statement of claim at the competent court at his/her address.

Before turning to the Hungarian National Authority for Data Protection and Freedom of Information or filing a statement of claim before court please get in contact with xLabs at the details written in Section 6 in order to have your complaint examined and solved as soon as possible.

6. Contact details of xLabs

Address: 1065 Budapest, Révay köz 4.;

E-mail: privacy@xlabs.hu

The xLabs reserves the right to change the Policy, or to modify it according to the changes in European Union law or in the Hungarian law. The xLabs informs the Candidates in e-mail about such changes.