

**TARGET**

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## INFORMATION ON DATA PROCESSING

<http://targetexecutivesearch.com/>

### I. GENERAL PROVISIONS

#### 1. Data of the Service Provider and/or Controller

##### **TARGET Hungária Korlátolt Felelősségű Társaság**

Registered office: 1024 Budapest, Lövőház utca 30. 1. em. 2.

Company reg. no.: 01-09-269435

VAT no.: 10904479-2-41

Managing director: Dr. Klemens Wersonig

Tel: +36 1 429 1020

Fax: +36 1 429 1029

E-mail: [office@targetexecutivesearch.com](mailto:office@targetexecutivesearch.com)

##### **TARGET Austria GmbH**

Registered office: 1090 Wien, Glasergasse 4/14

Company reg. no.: 309744g

VAT no.: ATU64250508

Managing Director: Dr. Klemens Wersonig

Tel: +43 676 927 66 44

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**TARGET SK, s.r.o.**

Registered office: Ventúrska 14 811 01 Bratislava

Company reg. no.: 35751282

VAT no.: 2020271935, SK2020271935,

Managing Director: Dr. Klemens Wersonig

Executive Director: Mariana Turanová

Tel: +421 2 54 41 16 17

E-mail address: [slovakia@targetexecutivesearch.com](mailto:slovakia@targetexecutivesearch.com)

**TARGET ČR s.r.o.**

Registered office: Francouzská 171, 120 00 Praha 2

Company reg. no.: 26453673,

VAT no.: CZ26453673,

Managing Director: Dr. Klemens Wersonig

Tel: +420 2 2252 2828

E-mail: [czechrepublic@targetexecutivesearch.com](mailto:czechrepublic@targetexecutivesearch.com)

**TARGET Romania SRL, TARGET Bulgaria,** representing by TARGET Romania SRL

registered office 17C Sevastopol Street, Building B, Office 19, District 1, Bucharest 010991

Trade Register: J/40/3936/1999

Fiscal Code: R 11 71 75 67

Account no: RO 23 BACX 0000 0000 30134311 ROL, RO 71 BACX 0000 0000 30134320 Euro HVB  
Bank Romania, Share Capital: 135.580.000 ROL

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Managing Director: Dr. Klemens Wersonig

Executive Director: Felicia Beldean

Tel: +40 21 319 4562

E-mail: [romania@targetexecutivesearch.com](mailto:romania@targetexecutivesearch.com)

**TARGET Executive Search Poland Sp.zo.o.**

Registered office: 2 Puławska Street, Building B , Level 3 Warszawa 02-566

Company reg. no.: 0000477572

VAT no.: PL 701-03-93-341

Managing Director: Dr. Klemens Wersonig

Executive Director: Joanna Dulniak

Tel: + 48 605 123 166

E-mail: [poland@targetexecutivesearch.com](mailto:poland@targetexecutivesearch.com)

– hereinafter: “Controller” – applies the following policy on data processing (hereinafter: “Policy”) in conducting data processing activities. The policy on data processing as amended from time to time is available on the website <http://targetexecutivesearch.com/> (hereinafter: “website”). The Controller reserves the right to change the *Policy* in order to harmonise it with the changing legislative background as well as with any other internal policy.

The Policy governs data processing activities related to the Controller’s services and available through the website.

**II. PURPOSE OF THE POLICY**

1. In relation to the content published on the website, the Controller attaches a particular importance and is also committed to ensuring protection for the personal data provided by the visitors of the website and the users (hereinafter collectively: “Users”), respecting their right to

- informational self-determination. In this context, it fully complies with all relevant legislation in force in promoting the safe use of the internet for the Users.
2. Therefore, this Policy is aimed at ensuring comprehensive rules for the processing of all facts, information and data (hereinafter collectively: "personal data") involved in the operation of and displayed on the website, those *falling within the material scope of* the Act CXII of 2011 on informational self-determination and freedom of information (hereinafter: "Information Act"), as per Article 2, paragraph (1) thereof, as well as the protection of such data from being accessed, used or potentially made public by unauthorised third parties.
  3. The Controller takes any and all IT measures related to data storage, data processing and data transfer as well as any other measures supporting the safe processing of data, in order to ensure protection of the data.

### III. BASIC DEFINITIONS

- *Data subject and/or User*: any defined natural person who is or can be identified, directly or indirectly, by reference to any personal data;
- *Personal data*: any data associated with the data subject – in particular the data subject's name, identifier or one or more pieces of information specific to his/her physical, physiological, mental, economic, cultural or social identity – as well as any conclusion that can be drawn from the data regarding the data subject;
- *Consent*: any freely given, informed and unambiguous indication of the data subject's wishes by which he or she clearly signifies agreement to the processing of personal data relating to him or her, either as a whole or limited to specific operations;
- *Legitimate interest*: it is in the legitimate interest of all natural persons to be offered better jobs, better salaries, thus better lives by the Controller (TARGET Executive Search Group companies). An offer, which they can accept or decline without any further obligations. It is also in the legitimate interest of the Controller to keep data on such natural persons, who for whatever reason do not want to be offered other jobs. Only by storing their data the Controller can guarantee and respect their privacy.
- *Controller*: any natural person, legal entity (TARGET Group companies) or organisation without legal personality which, alone or jointly with others, determines the purposes for which data are processed, makes decisions on processing (including the means thereof) and implements such decisions or engages a processor to implement them;
- *Processing*: regardless of the procedure applied, it includes any operation or set of operations performed on the data, in particular the collection, recording, registering, organisation, storage, alteration, use, retrieval, transfer, disclosure, alignment or combination, blocking, erasure and destruction of data, as well as preventing any further use of data, making any photographs, audio or video recordings, or recording any physical characteristics allowing for the identification of the given person;
- *Transfer*: making the data available to specific third parties;

- *Data handling*: performing any technical tasks related to data processing operations, regardless of the method and means applied for carrying out the operations as well as of the place of application, provided that such technical task is performed on the data;
- *Data file*: the data handled in the same electronic register, taken as a whole;
- *Third party*: any natural person, legal entity or organisation without legal personality other than the data subject, the controller and the processor;
- *Website*: the home page <http://targetexecutivesearch.com/> and all subpages thereof;
- *Partner*: the legal entities and business associations without legal personality using the Controller's services on a contract basis, to which the Controller transfers or may transfer personal data or in relation to which the Controller performs or may perform any data storage, data processing, or any related IT or other activity supporting the safe processing of data.

#### IV. THE CONTROLLER

1. The Controller makes sure that the data subject may be informed of all provisions of this policy. Furthermore, the Controller also makes sure this policy is available to the data subject.
2. The Controller does not verify the personal data provided to it and declines any responsibility for their correctness.
3. The Controller makes every reasonable effort to protect the personal data processed by it against any unauthorised access, alteration, disclosure, deletion, compromise and destruction, and to guarantee the technical conditions necessary for that.
4. The Controller declines any responsibility for the legality of any data processing carried out by any party it has a contract relationship with.

#### V. DATA PROCESSING PRINCIPLES

1. Any personal data may only be processed for a specific purpose, in order to exercise a right or to perform an obligation. Processing should, at every stage, be in accordance with the objective of processing, and data should be recorded and processed in a fair and lawful manner.  
– *Principle of purpose limitation* –
2. Only those personal data may be processed which are essential and suitable for achieving the objective of processing. Personal data may only be processed to the extent and for such time as is necessary to achieve the objective. – *Principles of proportionality and necessity* –
3. Personal data shall be considered as such as long as their links to the data subject can be restored. Links to the data subject shall be deemed restorable if the Controller is able to provide the technical conditions necessary for restoring them.
4. In the course of processing, it shall be ensured that data are accurate, complete and – if necessary for the purpose of processing – up-to-date, and that the data subject can only be identified for such time as is necessary to achieve the objective of processing.

5. By applying appropriate security measures, in order to protect the personal data stored in automated data files, the Controller prevents any accidental or unauthorised destruction or accidental loss or unauthorised access, alteration or dissemination of the data.
6. The data subject provides data on a voluntary basis. The Controller processes personal data with the data subject's consent or based on legitimate interest. Free consent or agreement shall comprise the user behaviour that consists in the user accepting that by using the website, he/she shall be automatically bound by all rules related to the use of the website. – *Personal scope of the Policy* –
7. The Controller transfers personal data to third parties only exceptionally, and only does so and combines its own database with other controllers' databases if the data subject has given his/her express consent thereto, or if it is in its legitimate interest or permitted by law, and if the safeguards for data processing are satisfied with regard to each and every personal data.

## VI. ACTIVITIES AND DATA AFFECTED BY DATA PROCESSING

### VI/A. Registration and login

1. The User may register on the website as job applicant.
2. Registration on the website is voluntary.
3. Following registration, the user may log in to the website.
4. Login to the website is voluntary.
5. Data processed in connection with registration and login:
  - a. User name
  - b. Password
  - c. Digital images if they have been uploaded by the user (data subject)

### VI/B. Responding to a job advertisement following registration

1. Following registration, the user may respond to any job advertisement of his/her choice which has not been closed yet.
2. Responding to job advertisements is voluntary.
3. Optional and mandatory data to be provided by the User in relation to the application and processed by the Controller:

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- a. Personal information
  - i. Family name
  - ii. First name
  - iii. Citizenship
  - iv. Gender
  - v. male
  - vi. female
  - vii. Date of birth (in the format “month-day-year”)
- b. Private addresses
  - i. Postal code
  - ii. Country
  - iii. City
  - iv. Street and house no.
  - v. Phone number
  - vi. Mobile phone number
  - vii. Private e-mail address
- c. Employment data (current and/or previous)
  - i. Current
    - 1. Company
    - 2. Employed since
    - 3. Sector
    - 4. Position
    - 5. Field
    - 6. Office e-mail address
  - ii. Previous employments
    - 1. Previous
      - a. Company
      - b. Employed since
      - c. Sector
      - d. Position
      - e. Field
    - 2. Previous 1
      - a. Company
      - b. Employed since
      - c. Sector
      - d. Position
      - e. Field
    - 3. Previous 2
      - a. Company
      - b. Employed since
      - c. Sector
      - d. Position
      - e. Field
    - 4. Previous 3
      - a. Company

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- b. Employed since
    - c. Sector
    - d. Position
    - e. Field
  - 5. Previous 4
    - a. Company
    - b. Employed since
    - c. Sector
    - d. Position
    - e. Field
- d. Language skills
  - i. Language skill
    - 1. Language
    - 2. Level
  - ii. Language skill 1
    - 1. Language
    - 2. Level
  - iii. Language skill 2
    - 1. Language
    - 2. Level
  - iv. Language skill 3
    - 1. Language
    - 2. Level
  - v. Language skill 4
    - 1. Language
    - 2. Level
- e. Education
  - i. Education
    - 1. School
    - 2. Started
    - 3. Graduated
    - 4. Certification
  - ii. Education 1
    - 1. School
    - 2. Started
    - 3. Graduated
    - 4. Certification
  - iii. Education 2
    - 1. School
    - 2. Started
    - 3. Graduated
    - 4. Certification
  - iv. Education 3
    - 1. School
    - 2. Started



3. Graduated
4. Certification
- v. Education 4
  1. School
  2. Started
  3. Graduated
  4. Certification
- f. Computer skills
  - i. SAP
  - ii. Other
- g. Additional employment information
  - i. Applying for Target position
  - ii. Expected monthly salary
  - iii. Expected salary currency
  - iv. Salary net/gross
  - v. Bonus %
  - vi. Desired work region – Budapest and list of counties
- h. Attach CV & motivation letter
  - i. CV
  - ii. CV language
  - iii. Motivation letter
  - iv. Motivation letter language

VI/C. Responding to a job advertisement without registration and/or login on the website

The Controller has ensured that the User may also respond to a given job offer if he/she not registered on the website, or if he/she registered but has not filled in the application form. In this case, the User may apply by sending his/her CV to

[cv.hu@targetexecutivesearch.com](mailto:cv.hu@targetexecutivesearch.com),  
[slovakia@targetexecutivesearch.com](mailto:slovakia@targetexecutivesearch.com),  
[romania@targetexecutivesearch.com](mailto:romania@targetexecutivesearch.com),  
[austria@targetexecutivesearch.com](mailto:austria@targetexecutivesearch.com),  
[czechrepublic@targetexecutivesearch.com](mailto:czechrepublic@targetexecutivesearch.com),  
[poland@targetexecutivesearch.com](mailto:poland@targetexecutivesearch.com)

or to the e-mail address of another staff member.

1. Responding to job advertisements using the e-mail address provided is voluntary.
2. Data processed in connection with the application:
  - a. User's name
  - b. User's e-mail address
  - c. Text of the cover letter sent by the User if any



- d. CV sent by the User and the data contained therein
- e. Other materials sent by the User if any

#### VIII/D. Processing CVs

1. In the course of any data processing referred to in sections VIII/A-C, the data subject makes or may make available to the Controller his/her CV and, as part of it,
  - a. the data specified in subsection VIII/B. 3.,
  - b. the data specified in subsection VIII/C. 3., which are processed by the Controller.
2. Any transfer or sending of CVs to the Controller is voluntary. By sending over his/her CV, the data subject authorises the Controller to forward the CV solely to its contract partners posting job advertisements as well as to the companies within TARGET corporate group<sup>1</sup>.
3. The Controller forwards the CVs in accordance with the provisions of this policy, with the consent of the data subject, to its contract partners posting job advertisements.

#### VI/E. The User's interview

1. The Controller – including the Controller's Staff Members – may invite the data subject for an interview to be held in person or via any audio(-visual) equipment.
2. Attending interviews is voluntary.
3. Data processed by the Controller in connection with the interview in person:
  - a. the data specified in subsection VIII/B. 3.;
  - b. the data specified in subsection VIII/C. 3.;
  - c. any other data recorded, communicated by the data subject to the Controller or Staff Member during the interview, including sensitive data;
  - d. any conclusion, statement or opinion formed by the Controller or the Staff Member regarding the appearance, personality or character of the data subject;
  - e. any statement made by the data subject;
  - f. any test and/or other exercise aimed at measuring any knowledge and/or skills, completed by the data subject, along with their results.

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<sup>1</sup> Countries within the corporate group: Hungary, Austria, Czech Republic, Poland, Bulgaria, Romania and Slovakia

### VII. STORAGE OF PERSONAL DATA, INFORMATION SECURITY

1. Personal data may only be processed in accordance with the activities referred to in section VI and in line with the purposes of data processing.
2. **The objectives of data processing** are the following:
  - 2.1. preparing, concluding and performing the contracts concluded or to be concluded with the Controller, including in particular
    - 2.1.1. recording, storing and processing the data subject's data for the purpose of contacting and maintaining contact with his/her;
  - 2.2. managing the databases intended for the purpose of using the Controller's services;
  - 2.3. transferring the data subject's data to the Controller's Partners;
  - 2.4. transferring the Partner's data to the data subject;
  - 2.5. meeting any legal obligations and asserting any legitimate interests of the Controller;
  - 2.6. following termination of the contract with the Controller, exercising any rights and meeting any obligations arising from the contract, in particular asserting any claims under the contract;
  - 2.7. preventing, investigating and detecting any abuses in relation to the Controller's services;
  - 2.8. based on a specific consent to this effect, contacts initiated by the Controller for direct marketing or market research purposes;
  - 2.9. improving the quality of services within the Controller's profile, and for this purpose, conducting market research as well as surveys relating to habits.
3. The legal basis of data processing: the data subject's free consent based on the preliminary information given by the Controller. If the processing of personal data is required by law, data processing shall be compulsory. The Controller shall also inform the data subject of this fact. If personal data have been recorded with the consent of the data subject, unless otherwise provided by law, the Controller may also process the data recorded even without any further specific consent and even following withdrawal of the data subject's consent in order to meet its legal obligation or to assert its own or any third party's legitimate interests, provided that such interests are asserted in proportion to any limitation of rights to the protection of personal data. The Controller shall inform the data subject if his/her personal data are processed on this legal basis.
4. Duration of data processing: until the data subject's personal data are deleted upon his/her request or he/she withdraws his/her consent to the processing of his/her data, or in the absence of such a provision – and unless otherwise provided by law –, until the data subject reaches legal retirement age.
5. Any modification or deletion of personal data, any withdrawal of consent, or any request for information on the processing of personal data is possible by sending a notification to [dataprotection@targetexecutivesearch.com](mailto:dataprotection@targetexecutivesearch.com).
6. The Controller ensures an IT environment for the processing of personal data in providing the services in such a way that
  - The personal data provided by the data subject are combined by the Controller with the data specified in subsections VI/B 3.), VI/C 3., VI/D. 3. c-f.), VI/E 1. d.) and VIII/F 1. c.) if such data are available.

- It ensures that the personal data can only be accessed by staff members of the Controller for whom it is indispensable in order to carry out their tasks arising from their job duties.
  - The date of modification is always indicated whenever data are modified. Backups are saved of the data.
7. In processing the data – in particular while storing, correcting or deleting them – and in the case of any information request or objection by the data subject, the Controller ensures the expected security level.
  8. Any other data of the data subject which cannot be associated with him/her either directly or indirectly and are unidentifiable – hereinafter: “*anonymous data*” – shall not qualify as personal data.
  9. *Use of “cookies” and web monitoring:*  
In operating our services, we process anonymous data using cookies, third parties’ authorised cookies, web monitoring software and/or any other technological solution and we track web browsing habits while monitoring and recording any use of and visit to our website, and then we collect such data and process them for statistical purposes in an aggregated form making it impossible to identify the users themselves.

### VIII. LEGAL REMEDIES

1. The data subject may ask for information on the processing of his/her personal data, or request that they are corrected or – except for data processing required by law – deleted or blocked by writing to the e-mail address referred to in section VII.5. or, with respect to individual activities involved by data processing, according to the instructions specified for them with sending an e-mail to the [dataprotection@targetexecutivesearch.com](mailto:dataprotection@targetexecutivesearch.com).
2. Upon the data subject’s request, the Controller provides information on the data processed by it, on the purpose, legal basis and duration of data processing, on the processor’s data and their activity associated with data processing, as well as on who receives or received the data and for which purpose.
3. The Controller shall correct any incorrect personal data, or delete the data if:
  - a) their processing is unlawful;
  - b) the data subject so requests;
  - c) they are incomplete or incorrect – and this cannot be lawfully resolved –, provided that deletion is not excluded by any law;
  - d) the purpose of data processing no longer exists, or if the statutory data retention period has expired;

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- e) it has been ordered by a court or the National Authority for Data Protection and Freedom of Information.
4. The Controller provides notification on the correction and deletion to the data subject as well as to all parties to which the data have been transferred earlier for processing. Such notification can be omitted if this does not adversely affect the legitimate interests of the data subject, having regard to the purpose of processing.
  5. The data subject may raise an objection against processing of his/her personal data if
    - a) the processing (transfer) of personal data is only necessary for asserting the controller's or data recipient's rights or legitimate interests, except in case of mandatory processing;
    - b) the personal data are used or processed for the purpose of direct marketing, opinion polling or scientific research;
    - c) the law otherwise allows for exercising the right of objection.
  6. The Controller shall inquire into the objection – while suspending data processing – within the shortest time from the request being submitted but no more than 10 working days and inform the requestor of the result in writing. If the requestor's objection is justified, the Controller shall stop processing the data – including any further recording and transfer –, block the data, and provide information on the objection and the measures taken on the basis thereof to all parties to whom it transferred the affected personal data earlier and who are required to take measures in connection with the right of objection being exercised.
  7. If the data subject does not agree with the Controller's decision or if the Controller misses the deadline set forth in section 6, the data subject shall be entitled to apply to a court within 30 days from giving notice thereof.
  8. Asserting rights before a court: The data subject may apply to a court if his/her rights are infringed. The court shall give priority to such cases. The burden of proving that data processing complies with the law lies with the Controller.
  9. In the case of any violation of his/her right of informational self-determination, he/she can submit notifications or complaints to the:

9.1.

a.) National Authority for Data Protection and Freedom of Information

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Telephone: +36 (1) 391 1400

Fax: +36 (1) 391 1410

www: <http://www.naih.hu>

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

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b.) Österreichische Datenschutzbehörde

Address: 1010 Wien Hohenstaufengasse 3

Tel. +43 1 531 15 202525

Fax +43 1 531 15 202690

e-mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

Website: <http://www.dsb.gv.at/>

c.) The Office for Personal Data Protection/ Urad pro ochranu osobnich udaju

Address: 170 00 Prague 7, Pplk. Sochora 27

Tel. +420 234 665 111

Fax +420 234 665 444

e-mail: [posta@uouu.cz](mailto:posta@uouu.cz)

Website: <http://www.uouu.cz/>

d.) The Bureau of the Inspector General for the Protection of Personal Data -  
GIODO

Address: 00-193 Warsaw, ul. Stawki 2

Tel. +48 22 53 10 440

Fax +48 22 53 10 441

e-mail: [kancelaria@giodo.gov.pl](mailto:kancelaria@giodo.gov.pl) ; [desiwm@giodo.gov.pl](mailto:desiwm@giodo.gov.pl)

Website: <http://www.giodo.gov.pl/>

e.) The National Supervisory Authority for Personal Data Processing

Address: Sector 1, BUCUREȘTI, B-dul Magheru 28-30

Tel. +40 21 252 5599

Fax +40 21 252 5757

e-mail: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)

Website: <http://www.dataprotection.ro/>

f.) Office for Personal Data Protection of the Slovak Republic

Address: 820 07 Bratislava 27, Hraničná 12

Tel.: + 421 2 32 31 32 14

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Fax: + 421 2 32 31 32 34

e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

Website: <http://www.dataprotection.gov.sk/>

10. In the case of any content which is offensive to minors or hateful or discriminatory, any infringement of the right to rectification or the rights of deceased persons or any harm to someone's good reputation, he/she can submit notifications or complaints to the:

10.1. National Media and Infocommunications Authority

1015 Budapest, Ostrom u. 23-25.

Postal address: 1525. Pf. 75

Tel.: (06 1) 457 7100

Fax: (06 1) 356 5520

E-mail: [info@nmhh.hu](mailto:info@nmhh.hu)

**VIII. MISCELLANEOUS**

1. This policy shall take effect on 1<sup>st</sup> March 2018

Dr. Klemens Wersonig

Managing director

**NAIH-90346/2015.**

**NAIH-90347/2015.**

**NAIH-90348/2015.**