

# PRIVACY NOTICE

## OF HUMAN CAPITAL FUND KFT.

on Personal Data processed via the Website

### Table of contents

1. Definitions.....	1
2. The Controller .....	2
3. Personal data processed .....	3
4. Recipient of data processing, data processors .....	4
5. Security of processing.....	4
6. Rights of data subjects .....	5

Last modified: October 20, 2025

### 1. Definitions

Processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Processing: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Restriction of processing: means the marking of stored personal data with the aim of limiting their processing in the future.

Controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Personal data breach: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

Pseudonymisation: means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

Consent: of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

Identified natural person: is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Recipient: means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

Third party: means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

Law / legislation / legal obligations: the Hungarian and European Union legislation currently in force.

Special categories of personal data: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data and data concerning health or data concerning a natural person's sex life or sexual orientation.

- (a) Genetic data: means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
- (b) Biometric data: means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- (c) Data concerning health: means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

Profiling: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Personal Data: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## 2. The Controller

The Data Controller: Human Capital Fund Kft.  
Seat: HU-1131 Budapest, Mosoly str. 42/A 2/1.  
Mailing address: HU-1131 Budapest, Mosoly str. 42/A 2/1.  
E-mail: [anetta.vitaris@humancapitalfund.hu](mailto:anetta.vitaris@humancapitalfund.hu)  
Phone: +36 30 215 1445

### 3. Personal data processed

Name of the processing	Purpose of processing	Legal ground of processing	Scope of data processing	Duration
Data processing during contacting the Data Controller	The purpose of data processing is for the Data Controller to be able to answer and respond to your questions and requests, thus complying with the contents of your request as much as possible.	Consent of the data subject GDPR Article 6 (1) (a)	Any personal data that you, as the data subject, provide to the Data Controller during the contact.	The Data Controller will process your personal data until the question is answered or your claim is settled or your consent is withdrawn. Thereafter, all personal data you provide will be permanently and irrevocably deleted.
Data processing during application for a job, and enabling continuous recommendations in the possession of the CV	The purpose of data processing is for the Data Controller to contact you as an applicant for a job advertisement and to forward your personal data to the partner/client of the Data Controller.	Consent of the data subject GDPR Article 6 (1) (a)	Name, contact details (telephone number, email address) or any personal data you provide to the Data Controller during the application process.	The Data Controller shall process the personal data on the basis of consent as a legal basis until the date of withdrawal of the consent, but not longer than for a period of 1 year from the receipt.
Cookie handling	The Data Controller uses cookies on its website, and the service providers used by the Data Controller may place cookies on the visitor's computer in order to display targeted advertisements to them and to analyze the use of the website.	Consent of the data subject GDPR Article 6 (1) (a)	User computer data; the IP address used by the visitor, browser type, the operating system characteristics of the device you are browsing.	The Data Controller processes the personal data until the withdrawal of your consent (disabling the use of cookies in your browser) or for a maximum period of 2 years. After that, the personal data will be deleted.

#### 4. Recipient of data processing, data processors

Name of the recipient	Purpose of the transfer
Google Ireland Ltd.	Cookie management, use of analytical services, advertising space
Permanent or occasional partners/clients of the Data Controller	Since the Data Controller is acting as an employment agency, it transfers the personal data processed during the application, - in particular your CV- to its client or clients. The Data Controller will always inform you about the identity of the client or clients orally or by e-mail. If you apply for more than one application, the Controller may transfer the personal data of you to several other data controllers. You will always receive at least oral information about the recipients. Providing that your application is no longer valid, you have the option to withdraw your consent. In this case, it is necessary to indicate whether you wish to withdraw your consent to the data processing in respect of the personal data processing of the Data Controller or the additional data controllers (client or clients) entrusting the Data Controller. By withdrawing your consent only in respect of the client, it gives the Data Controller the opportunity to mediate you to similar, relevant clients and job opportunities.

Privacy notices on the data processing of the service providers indicated above is available via the following links:

- Google Ireland Ltd.  
<https://policies.google.com/privacy?hl=en-US>
- Permanent or occasional client of the Data Controller

The availability and location of the relevant privacy notice of the client or clients will be made available to you by Data Controller in all cases.

The Data Controller is not responsible for the content, data and information protection practices of external websites available as a jumping point from the Website. If the Data Controller becomes aware that any link linking to Website violates the rights of the data subjects or the applicable legislation, it will immediately remove the link from the Website.

The content of external websites available as a link from the Website is usually provided by third parties who are not affiliated with the Data Controller. These third parties may also place content, cookies on the user's computer, or collect data on their own websites using similar technologies. In such cases, the data processing shall be governed by the data protection regulations laid down by these third parties and the Data Controller shall not be liable for such data processing.

#### 4. Security of processing

In order to guarantee an adequate level of data security, the Data Controller assessed the risks arising in connection with its data processing in its internal Data Management Regulations and assessed them in terms of the severity of the risks and the probability of their occurrence.

By operating its IT systems in connection with the Website, the Data Controller implements appropriate technical and organisational measures to prevent the access of your data to unauthorized persons and the deletion or modification of the data by unauthorized persons. We also enforce data protection and data security requirements against our data processors.

We keep a record of any personal data breaches and, if necessary, inform you of the data breaches that may occur.

The Data Controller uses password protection on its computers and provides firewall protection for its IT devices.

The end-to-end Internet communication between the User and the Website is encrypted via https (http + ssl) protocol.

In case of data transfer, the reason and time of accessing the data shall be recorded in Data Controller's protocol and a data transfer record shall be kept in accordance with the provisions of the GDPR.

## 5. Rights of data subjects

You have the right at any time to request information about the personal data we process about you by post, electronically or by telephone via the contact details indicated in this notice.

Upon request, we will inform you about:

- the data processed,
- the purpose of the data processing,
- its legal basis,
- its duration,
- who receives or has received your data and for what purpose.

The information shall be provided in writing within 30 days of the submission of the request, on paper or electronically, depending on the form of the request for information.

You may object to the processing of your personal data at any time. The objection will be examined as soon as possible, but not later than within 30 days, a decision will be made on its merits and you will be notified on the decision.

You have the right at any time to request the deletion of personal data we process or the correction of incorrectly recorded personal data.

In addition, we will restrict the processing of your personal data if you request it or if the information available to us suggests that deletion would harm your legitimate interests. Personal data restricted in this way will be processed for as long as the purpose of the data processing or the legitimate interest that precluded the deletion of the personal data exists.

You as a data subject shall have the right to obtain from the Data Controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing pursuant to Article 21(1) of GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

You have the right, through the contact details provided in this notice, to receive your personal data from the Data Controller in a structured, widely used machine-readable format, and to transfer this data to another data controller without would be hindered by the Data Controller.

Requests for access, deletion, rectification, restriction, and portability will be complied with and notified as soon as possible, but no later than 30 days. If we are unable to fulfill your request, we will notify you within 30 days.

If your personal data has been transferred to another person with your consent, the recipient of the transfer will also be notified of the necessary steps.

If we process your personal data with your consent, you have the right to withdraw your consent at any time. You may withdraw your consent by contacting the Data Controller at the contact details set out in this notice.

If you are visually impaired or elderly, you may request the Data Controller at the contact details set out in this Privacy Notice to make the contents of the Privacy Notice available in word or text format or in capital letters.

In addition, you are entitled to file a complaint to the Hungarian National Authority for Data Protection and Freedom of Information

Seat. HU-1055 Budapest, Falk Miksa str. 9-11.

Website: [www.naih.hu](http://www.naih.hu),

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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

or to enforce your rights in relation to the processing of your personal data before the competent court under the Act CXXX of 2016 on Civil Procedure.

You can find the competent court at the link below:

<https://birosag.hu/birosag-kereso>

You may exercise the rights listed in this notice at any time by contacting the Data Controller by e-mail or otherwise in writing. In connection with your request, you may be asked to identify yourself or to provide any other information relating to you which is used to prove entitlement.

You can contact the Data Controller at the contact details set out in point 2.

**Human Capital Fund Kft.  
Data Controller**