

Privacy statement for participants in a recruitment procedure

Trocellen Automotive Hungary Co. Ltd. (with registered office in H-2330 Dunaharaszti, Raktár u. 8.), as data controller (hereinafter, “**Data Controller**”), informs you pursuant to the Legislative Decree no. 112/2011 (“**Privacy Code**”) and the EU Regulation no. 679/2016 (“**GDPR**”), that your Personal Data shall be processed according to the following modalities and for the following purposes:

1. Object of the Processing

The Data Controller processes the following personal data (hereinafter “**Data**” or “**Personal Data**”) communicated by you (or by third parties, as subject in charge of the recruitment process) during the recruiting stage, the job interview and the selection:

- Identification and contact details (e.g. first name, surname, address, photograph, telephone number, e-mail address, position applied for, etc.);
- Personal data (e.g. studies, languages spoken, skills, previous jobs, personal details, etc.) mentioned in your CV or cover letter;

In the event of a successful selection, in preparation for the conclusion of a labour contract:

- special personal data: data relating to trade union membership and health (e.g. trade union memberships, data relating to illness or injury, pregnancy, medical certificates, proof of suitability for certain jobs).

2. Purposes of Data Processing

Your Personal Data are processed without your prior consent for the following purposes:

- a) managing the recruitment process (in particular: proceeding with applications);
- b) assessing your suitability for the job you are applying for.

In the event of a successful selection, in preparation for the conclusion of a labour contract:

- c) to establish the health status required for the job or certain tasks (e.g. to carry out an occupational health assessment);
- d) the exercise of a right conferred by law or an employment rule (e.g. enforcement of rights in employment or other legal or administrative proceedings).

3. Modalities of Data Processing

The processing of your Data is carried out, both according to hard paper and electronic modalities, by means of data collection, registration, organization, storage, consultation, elaboration, amendment, selection, mining, comparison, usage, interconnection, blockage, communication, cancellation and destruction operations.

4. Legal basis and duration of Data Processing

With regard to the purpose of data processing referred to in clause 2 (a):

- legal basis for processing: processing necessary for legitimate interests of the Data Controller),
- duration of data processing: until six months after the conclusion of the contract with the candidate selected as a result of the selection procedure. The data of candidates who are not selected will be deleted immediately after the recruitment process is completed.

With regard to the purpose of data processing referred to in clause 2 (b):

- legal basis for processing: processing necessary for the purposes of legitimate interests (assessment of aptitude for the job) of the Data Controller,
- duration of data processing: five years from the date of the aptitude test or, in the case of a labour contract, from the termination of the employment relationship. The data of candidates who are not selected will be deleted immediately after the recruitment process is completed.

With regard to the purpose of data processing referred to in clause 2 (c):

- legal basis for processing: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; processing necessary for compliance with a legal obligation (compliance with legal obligations imposed on the employer).

- duration of data processing: five years from the date of the aptitude test or, in the case of a labour contract, from the termination of the employment relationship. The data of candidates who are not selected will be deleted immediately after the recruitment process is completed.

With regard to the purpose of data processing referred to in clause 2 (d):

- legal basis for processing: processing necessary for the purposes of the enforcement of legitimate interests (enforcement of rights in an employment dispute or civil law litigation) of the Data Controller,
- the duration of the processing: until the legal remedies for the exercise of the right have been exhausted.

5. Nature of the Data provision and consequences of a refusal to answer

The provision of Data is mandatory. Should you decide not to provide your Data, this would imply the impossibility to begin or carry on participation in the workforce selection process or the employment relationship.

6. Access to Data

Your Data may be made accessible for the purposes mentioned above to the following persons:

- employees and/or collaborators of the Data Controller, in light of their role of persons in charge of the processing and/or external Data Processors, joint Data Controllers and/or system administrators;
- occupational health medical doctor¹;
- a competent employee or manager of certain European affiliates of the Data Controller², in the case of a job application for a function at group level.

7. Data Communication

Your Data may be communicated, even without your prior consent, upon their request, to control bodies, police or judiciary bodies, Budgetary Ministry, Tax Authority, ministerial bodies and competent Authorities, Local Institutions (Regions, Provinces, Municipalities), Regional and Local Tax Authorities, that will process them in their quality of independent Data Controllers for official purposes and/or pursuant to the law during investigations and controls.

8. Data Transfer

Your Data shall not be disseminated or transferred to extra EU countries.

9. Data Subject's Rights

The Data Controller informs you that, in your quality of Data Subject, you have the rights to:

- obtain confirmation over the existence or inexistence of Personal Data relating to you and its communication in a comprehensible way;
- receive information and, if necessary, a copy of: (a) the source and category of Personal Data; (b) the method used, if data processing is carried out by electronic means; (c) the purposes and means of the processing; (d) information to identify the Data Controller and the Data Processors; (e) the persons or categories of persons who may receive the Personal Data or who may have access to them, in particular if the recipient is a country outside the EU or an international organisation; (e) the duration of the storage of the Personal Data or, where this is not possible, the criteria for determining this duration; (f) the existence of automated decision-making processes and, if any, the method behind them and their relevance and consequences for the data subject; (g) the existence of appropriate safeguards in the event of transfers of Personal Data to a country or international organisation outside the EU;
- obtain, without undue delay, the update, the rectification or, whether you are interested, the integration of incomplete Data;
- to have the following Data deleted, anonymized or blocked in the following cases: (a) data that have been unlawfully processed; (b) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; (c) if you withdraw your consent on which data processing is based and there

¹ Current occupational health medical doctor: CastiliaGmbH. (H-1091 Budapest, Üllői út 101. V./7.)

² Affected affiliates: Trocellen GmbH, Polifoam Kft., Trocellen Italia S.p.A., Trocellen Ibérica S. A.

is no other legal basis for the processing; (d) if you object to the processing and there is no legal basis overriding this; (e) in accordance with the legal obligations applicable to the Data Controller; (f) data relating to children. The Data Controller may refuse to erase the Data if data processing is necessary for: (a) the exercise of the right to freedom of expression and information; (b) the performance of a task carried out in the public interest or in the exercise of official authority in accordance with a legal obligation; (c) reasons of public interest in the field of public health; (d) scientific or historical research or statistical purposes of public interest; (e) the establishment, exercise or defence of legal claims;

- restrict processing where: (a) the accuracy of the Personal Data is questionable; (b) data processing is unlawful and the data subject opposes the erasure of the Personal Data; (c) the Data is requested for the purpose of lodging a legal complaint; (d) where the data subject has objected to processing, pending verification that the legal bases of the Controller override those of the data subject;
- receive the Personal Data concerning you in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance from the controller to which the personal data have been provided, provided that the processing is carried out by automated means;
- to object in part or totally against: (a) the processing of Personal Data regarding you based on lawful interest, public interest or public authority, even if is unavoidable in terms of the Data collection; (b) to the processing of Personal Data that relates to you for the purpose of sending advertising material or of direct sale or for market researches or commercial communication, by means of automated call systems without the intervention of an operator, e-mail and/or traditional marketing methods by telephone and/or paper mail;
- submit a complaint to the competent supervisory authority.

In the cases mentioned above, if necessary, the Data Controller shall communicate any exercise of your rights to each third party to whom the Personal Data are communicated, except for specific cases (for example, if this proves impossible or involves disproportionate effort).

10. Modalities of Exercise of Rights

You shall be able to exercise your rights anytime:

- by sending a registered letter with return receipt to the address of the Data Controller;
- by sending an email to office.cca@trocellen.com;
- by calling the following phone number: +36203948593

11. Data Controller, Data Processor and Persons in Charge of the Processing

The Data Controller is:

Trocellen Automotive Hungary Co. Ltd. (H-2330 Dunaharaszti Raktár u. 8.,)

The appointed Privacy Officer is:

- Szabolcs Kállai
- Address: H-2330 Dunaharaszti Raktár str. 8.
- Phone no.: +36203948593
- E-mail: szkallai@trocellen.com

The updated list of Data Processors and joint Controllers is kept at the office of the Data Controller in H-2330 Dunaharaszti Raktár u. 8. and will be forwarded to you electronically upon request.

Dunaharaszti, 16/01/2023