

# Partner in Pet Food Hungária Kft. Data Protection Notice

Latest update: 25 May 2018



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## 1. GENERAL INFORMATION

**Partner in Pet Food Hungária Korlátolt Felelősségű Társaság** ("Company") processes information in connection with third parties, contact persons of its contracting partners and other individuals including e.g. consumers (who are hereinafter referred to collectively as "individuals") which information qualifies as "personal data" as defined in point 1 of article 4 of the General Data Protection Regulation No 2016/679 of the EU ("GDPR").

This Data Protection Notice ("Notice") provides information regarding the processing of these personal data and the rights and remedies of the individuals.

### **Contact details of the Company:**

The registered seat of the Company: H-2040 Budaörs, Puskás Tivadar utca 14 The company registration number of the Company: Cg. 13-09-090774

The Company is registered at the Company Court of the Appeal Court of the Budapest Region

The telephone number of the Company: +36 1 801 02 03

The e-mail address of the Company: info@ppfeurope.com

The website of the Company: <http://www.ppfeurope.com/>

## 2. UPDATES AND AVAILABILITY

The Company reserves the right to modify this Notice unilaterally with effect subsequent to such modification, subject to the limitations provided for in the laws and with advance notification to the individuals in due time, if necessary. The Company may modify this Notice especially when it is required upon changes in the laws, the practice of the data protection authority, business needs or employees' needs or any newly revealed security exposures. Upon request, the Company will send a copy of the latest updated version of this Notice to individuals.

## 3. SPECIFIC DATA PROTECTION TERMS

In certain cases, specific privacy-related terms and conditions may also be applicable of which the individuals who are affected by them will be duly notified. Such specific terms and conditions are provided for in connection with the operation of electronic surveillance systems (i.e. cameras), the entry-control systems operated at the entryways to the offices of the Company, and about cookies that are used on the website of the Company.

## 4. SCOPE OF THE DATA AND THE PURPOSE OF THEIR PROCESSING

The table below describes the scope of the processed personal data, the purposes, the legal basis, the duration of the processing and the scope of the persons authorised to have access to the data are described. Where a purpose of processing is required for pursuing a legitimate interest of the Company then the Company will make available the balancing test of the underlying interests upon a request submitted to one of the contact details of the Company above. **The Company wishes to draw the attention of the individuals to their right of objection to the processing of their personal data due to a cause related to their own situation any time where the processing is based on legitimate interest including the case where the processing takes the form of profiling. In such a case, the Company ceases processing the personal data unless it can prove that the processing has to be continued due to compelling legitimate reasons which override the interests, rights and freedoms of the individuals or which relate to the submission, the enforcement or the protection of legal claims.**

Purpose of the processing	Legal basis of the processing	Scope of processed data	Duration of storage, access rights, data transfers
<p><b>Allowing participation in promotions and advertising campaigns (including prize games organised by the Company)</b> – in accordance with the applicable terms and conditions of participation</p>	<p>Article 6 1. a) of the GDPR – voluntary consent of the individual given in the course of his/her participation in the promotion or advertising campaign in accordance with the applicable terms and conditions of participation.</p> <p>The individual may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal.</p> <p>Without the consent, the individual cannot participate in the given promotion, advertising campaign or prize game.</p>	<p>The scope of participating persons and the personal data are determined on a case by case basis, in accordance with the applicable terms and conditions of participation (e.g. name, residential address and the chosen gift, vote cast in a public voting game open for the public etc.).</p>	<p>The duration of processing is determined on a case by case basis, in accordance with the applicable terms and conditions of participation taking into account the closing date of the promotion or advertising campaign and the time required for the delivery of the prizes, where applicable.</p> <p><b>Authorised persons having access to the data within the Company:</b> determined on a case by case basis, in accordance with the applicable terms and conditions of participation. Unless determined otherwise, the persons having tasks in relation to the promotion or advertising campaign are authorised to have access to the data.</p>
<p><b>Making records of and recordings at Company events</b></p>	<p>Article 6 1. a) of the GDPR (voluntary consent of the individual).</p> <p>The individual may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal.</p> <p>Without the consent, no recordings can be made.</p> <p>No consent is needed for making recordings and using them where the recordings are made at activities of the individual which qualify as acting in the public or where a mass of persons is depicted (article 2:48 of the Act V of 2013 on the Civil Code (“Hungarian Civil Code”).</p>	<p>Making photos or videos at events organised by the Company (portraits of individuals). With the consent of the individuals, the photos or videos may be published in the intranet as well as on external media of the Company (e.g. the LinkedIn site of the Company) or on other media likewise (e.g. Company leaflets or brochures).</p>	<p>The recording will be deleted if the individual so requested. In case of recordings which have been made public, however, the right of withdrawal can only be exercised until the time when such materials appear publicly. For instance, where photos have appeared publicly, third parties might copy and/or save them outside the control of the Company.</p> <p><b>Authorised persons having access to the data within the Company:</b> until the recordings have appeared publicly, such recordings are handled by the HR Department.</p> <p>Recordings which have been made publicly available on the intranet of the Company, can be seen by all members of the Company’s personnel.</p> <p>The materials appearing on the LinkedIn site of the Company and on any internet or other media are public.</p>

Purpose of the processing	Legal basis of the processing	Scope of processed data	Duration of storage, access rights, data transfers
<p><b>Sending invitations to events organised by the Company</b></p>	<p>Article 6 1. f) of the GDPR (processing of the data is needed for pursuing the legitimate interests of the Company).</p> <p>The legitimate interest: successful and efficient organisation of events.</p>	<p>Contact details of the persons whom the Company intends to invite: the names of the participants and the organisations they represent and other data they may provide in connection with their participation (e.g. anticipated time of arrival, preferred presentation or other event, etc.).</p>	<p>Unless the individual objects to the processing of his/her data, contact details can be used also after the event for sending out invitations to events organised by the Company or on other occasions for seeking contact. The Company stores the data for 5 years after the last contact made with the individual (Section 6:22 (1) of the Hungarian Civil Code – claims lapse in 5 years).</p> <p><b>Authorised persons having access to the data within the Company:</b> employees of the Marketing Department</p>
<p><b>Processing the personal data of contact persons representing contracting partners and/or involved in contract performance / verification of performance (i.e. day by day implementation of contracts).</b> This includes e.g. the processing of postal addresses of contact persons, their payment instructions or the sending official notifications through the contact details and information regarding contractual obligations to be fulfilled.</p>	<p>It depends whether the contract is concluded with the individual (e.g. a private entrepreneur) or with other undertakings; it is Article 6 1. b) of the GDPR where the contract has been concluded directly with the individual and the purpose is the implementation of the contract, or it is Article 6 1. f) of the GDPR – pursuing the legitimate interests of both the Company and those of the contracting partner: fulfilling the obligations, exercising the contractual rights and synchronising cooperation between the contracting parties.</p> <p>The exchange of personal data is required under the contract; without them, the Company is unable to conclude the contract and/or implement it.</p>	<p>The contact details (i.e. e-mail addresses, telephone numbers, mobile phone numbers, telefax numbers) of the contact persons representing the contracting partners and/or involved in contract performance / verification of performance, and any other activity of or communication between the contracting parties which includes any kind of personal data (e.g. communication received from a contact person or any other person acting on behalf of a contracting partner).</p> <p>The personal data are either provided to the Company by the contracting partner, or the individuals themselves.</p>	<p><b>5 years</b> after the date when the contractual relation ceased (Section 6:22 (1) of the Hungarian Civil Code – claims lapse in 5 years)</p> <p><b>Tax obligations:</b> duration of data storage is <b>5 years</b> of the last date of the calendar year in which the tax concerned should have been declared or reported or, in the absence of such declaration or report, the tax should have been paid (Sections 78 (3) and 202 (1) of Act CL of 2017 on the Taxation Procedure - <b>”Hungarian Taxation Act”</b>).</p> <p><b>Accounting documents:</b> duration of data storage is <b>8 years</b> (Sections 168-169 of Act C of 2000 on Accounting - <b>”Hungarian Accounting Act”</b>). E.g. the data that are included in documents which support the accountancy records e.g. data in contract documents between the Company and the counterparty (such as an order) or on an invoice.</p> <p><b>Authorised persons having access to the data within the Company:</b> in the competent areas that are affected by the subject matter of the contract.</p>

Purpose of the processing	Legal basis of the processing	Scope of processed data	Duration of storage, access rights, data transfers
<p><b>Processing the personal data of contact persons representing contracting partners and/or involved in contract performance / verification of performance in connection with compliance issues or any other activity needed to enforce contract performance including seeking remedies in order to enforce the rights arising from the contracts</b></p>	<p>The legal basis of processing data is the legitimate interest of the Company (Article 6 1. f) of the GDPR). The legitimate interest: handling compliance issues or any other activity needed to enforce contract performance including seeking remedies in order to enforce the rights arising from the contracts.</p>	<p>The contact details (i.e. e-mail addresses, telephone numbers, mobile phone numbers, telefax numbers) of the contact persons representing the contracting partners and/or involved in contract performance / verification of performance, and any other activity of or communication between the contracting parties which includes any kind of personal data (e.g. communication received from a contact person or any other person acting on behalf of a contracting partner).</p> <p>The personal data are either provided to the Company by the contracting partner, or the individuals themselves.</p>	<p><b>5 years</b> after the date when the contractual relation ceased (Section 6:22 (1) of the Hungarian Civil Code – claims lapse in 5 years)</p> <p><b>Tax obligations:</b> duration of data storage is <b>5 years</b> of the last date of the calendar year in which the tax concerned should have been declared or reported or, in the absence of such declaration or report, the tax should have been paid (Sections 78 (3) and 202 (1) of the Hungarian Taxation Act).</p> <p><b>Accounting documents:</b> duration of data storage is <b>8 years</b> (Sections 168-169 of the Hungarian Accounting Act). E.g. the data that are included in documents which support the accountancy records e.g. data in contract documents between the Company and the counterparty (such as an order) or on an invoice.</p> <p><b>Authorised persons having access to the data within the Company:</b> in the competent areas that are affected by the subject matter of the contract.</p>

Purpose of the processing	Legal basis of the processing	Scope of processed data	Duration of storage, access rights, data transfers
<p><b>Handling customer and other requests received by the Company</b></p>	<p>Article 6 1. f) of the GDPR (processing is needed to pursue the legitimate interests of the Company and those of its customer).</p> <p>The legitimate interest: handling customer and other requests, responding to inquiries, and the mutual performance of the obligations arising from customer contracts.</p>	<p>The personal data affected by the customer and other requests that are received by the Company, the contact data of the customers and other people (i.e. names, addresses, e-mail addresses, telephone numbers) and the records of the actions done in relation to the request.</p>	<p><b>5 years</b> after answering the request (Section 6:22 (1) of the Hungarian Civil Code – claims lapse in 5 years)</p> <p><b>Authorised persons having access to the data within the Company:</b> Customer Service - "CS".</p> <p>The Company transfers the data within its company group:</p> <p>Partner in Pet Food Polska SP.z.o.o. ul. Szamocka 8, Warsaw 01-748, Poland telephone No: +48 22 569 24 10, <a href="mailto:info.pl@ppfeurope.com">info.pl@ppfeurope.com</a>,</p> <p>Partner in Pet Food CZ s.r.o. Bucharova 1423/6 158 00 Prague 13 - Nové Butovice, Czech Republic telephone No: +420 234 111 111; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p> <p>Partner in Pet Food SK s.r.o. Kračanská cesta 40, 929 01 Dunajská Streda, Slovakia telephone No: +421 31 559 13 65; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p> <p>Partner in Pet Food NL B.V. Wijchenseweg 132 6538 SX Nijmegen, Holland telephone No: +31 24 34 35 910; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p> <p>Legal basis of the data transfer: Article 6 1. f) of the GDPR (the data transfer is needed for pursuing the legitimate interests of the Company and its group companies). The legitimate interest: using the knowledge of the company group for more efficient processing of customer and other requests and sharing the relevant experience to serve customers better.</p>

Purpose of the processing	Legal basis of the processing	Scope of processed data	Duration of storage, access rights, data transfers
<p><b>Handling consumer requests received by the Company</b></p> <p>In most cases, consumer requests (e.g. inquiries, comments or complaints) are forwarded to the Company by its contracting partners (e.g. Lidl, Tesco, etc.). The Company may respond to such requests directly or assist the contracting partners in the preparations of their responses.</p> <p>In case a request is received through social media (e.g. Facebook) then the terms and conditions of the social media service provider for data processing and use may also be applicable.</p>	<p>Article 6 1. f) of the GDPR (processing is needed for pursuing the legitimate interests of the Company and those of its contracting partner).</p> <p>The legitimate interest: handling consumer requests is in the legitimate business interest of both the Company and its contracting partner. In addition, handling consumer requests is also a legal requirement for the contractual partner pursuant to article 17/A of the Act CLV of 1997 on consumer protection ("Hungarian Consumer Protection Act"). The Company provides assistance at this so accelerating the process of responding to consumer requests and processing consumer complaints and enhancing the same with the information in its possession.</p>	<p>The personal data affected by consumer requests that are received by the Company, contact data of the contact persons acting on behalf of consumers and the contracting partner (names, addresses, e-mail addresses, telephone numbers), the content of the claims (complaints), requests presented by the consumers as individuals, the records taken on actions, and the contents of the records made under Section 17/A of the Hungarian Consumer Protection Act.</p>	<p><b>5 years</b> after answering the request (Section 6:22 (1) of the Hungarian Civil Code – claims lapse in 5 years). The records taken on the consumer complaint and the response to it have to be stored also for <b>5 years</b> (Section 17/A. (7) of the Hungarian Consumer Protection Act).</p> <p><b>Authorised persons having access to the data within the Company:</b> Customer Service . "CS". The Company transfers the data within its company group:</p> <p>Partner in Pet Food Polska SP.z.o.o. ul. Szamocka 8, Warsaw 01-748, Poland telephone No: +48 22 569 24 10, <a href="mailto:info.pl@ppfeurope.com">info.pl@ppfeurope.com</a>,</p> <p>Partner in Pet Food CZ s.r.o. Bucharova 1423/6 158 00 Prague 13 - Nové Butovice, Czech Republic telephone No: +420 234 111 111; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p> <p>Partner in Pet Food SK s.r.o. Kračanská cesta 40, 929 01 Dunajská Streda, Slovakia telephone No: +421 31 559 13 65; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p> <p>Partner in Pet Food NL B.V. Wijchenseweg 132 6538 SX Nijmegen, Holland telephone No: +31 24 34 35 910; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p> <p>Legal basis of the data transfer: Article 6 1. f) of the GDPR (the data transfer is needed for pursuing the legitimate interests of the Company and its group companies). The legitimate interest: use of the knowledge of the company group for more efficient processing of consumer requests and sharing the relevant experience to serve consumers better.</p>

## 5. DATA PROCESSORS

The contracting partners engaged by the Company for carrying out tasks related to data processing operations are listed below. Such contracting parties act as "data processors" i.e. they process the personal data defined in in this Notice on behalf of the Company.

The Company should use only data processors providing sufficient guarantees, in particular in terms of expert knowledge, reliability and resources, to implement technical and organisational measures which will meet the requirements of the GDPR, including for the security of processing. The particular tasks and liabilities of the data processor are stipulated in the data processing agreement made between the Company and the data processor. After the completion of the processing on behalf of the Company, the processor should, at the choice of the Company, return or delete the personal data, unless there is a requirement to store the personal data under Union or Member State law to which the processor is subject.

Data processor	Tasks
<b>Contracting partners participating in promotions and advertising campaigns (including prize games organised by the Company)</b>	The details of the data processor and its tasks are indicated in the terms and conditions of participation in the given promotion.
<b>External IT service providers of the Company</b>	Hosting services, system administration tasks, on-site support to end-users, maintenance of computers, managing user accounts and permitting installations, operation of servers, checking backups, domain administration.
<p><b>Partner in Pet Food Polska SP.z.o.o.</b> ul. Szamocka 8, Warsaw 01-748, Poland telephone No: +48 22 569 24 10, <a href="mailto:info.pl@ppfeurope.com">info.pl@ppfeurope.com</a>.</p> <p><b>Partner in Pet Food CZ s.r.o.</b> Bucharova 1423/6 158 00 Prague 13 - Nové Butovice, Czech Republic telephone No: +420 234 111 111; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p> <p><b>Partner in Pet Food SK s.r.o.</b> Kračanská cesta 40, 929 01 Dunajská Streda, Slovakia telephone No: +421 31 559 13 65; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p> <p><b>Partner in Pet Food NL B.V.</b> Wijchenseweg 132 6538 SX Nijmegen, Holland telephone No: +31 24 34 35 910; <a href="mailto:info@ppfeurope.com">info@ppfeurope.com</a></p>	<p>IT services on the basis of an indefinite-term service agreement.</p> <p>E.g.: efficient central arrangement of IT services, the operation of the IT systems, preparation of security back-up saves, protection of the company-wide network and preparations for data loss incidents. IT support of processes related to access and leaving of employees, manage user accounts, set permissions, blocking access of user accounts, archiving email accounts, remote deletion of mobile phones.</p>
<b>Screen sharing, online meeting, web conferencing service</b>	The Company may share the personal data listed in this Notice when it is using screen sharing, online meeting, web conferencing service during its day-to-day communications.

## **6. TECHNICAL AND ORGANISATIONAL DATA SECURITY MEASURES**

The Company protects the personal data it processes primarily by restricting the access to the information and by the unambiguous regulation of the rights to use them. Only such persons may have access to the systems and instruments used for processing the personal data referred to in this Notice whose access is required in order to fulfil the above-mentioned purposes and who are authorised to exercise such access. These persons include e.g. designated team members or departments (e.g. to user data that are required for the use of the Company's IT systems, it is the IT Department authorised to have access).

The Company ensures the safe and legitimate use of the devices which it makes available (including Company-owned computers, laptops and mobile phones), the e-mail boxes and the Internet and the desirable level of consciousness of the employees related to such use by applying the following measures:

- The Company expects that the devices which it made available and which have access to the Internet as well as the e-mail boxes are used by the employees with specific user names and passwords, adequately complex and up-dated at regular intervals.
- The Company protects all its systems and devices by fire walls, antivirus software and spam filters. In addition, the Company operates an intrusion protection system (so-called IPS) which enables the detection, blocking and logging of illegitimate attempts of access to the computers systems of the Company.
- The Company makes available safe wired and wireless network access for all devices.
- Remote access to the systems and software of the Company for any device is possible only through safe connection (VPN) by using specific user names and passwords, with mitigation of chances of accidental access (including illegitimate access by the use of stolen or lost devices)
- The IT Department of the Company carries out regular software and system up-dates and back-up saves of data in accordance with its own internal regulations.

As regards the physical protection of data and electronic documents, the Company owns locked server rooms and procures in that access to a particular document is reserved to adequately authorised persons only (e.g. access to HR documents is reserved to the HR Department).

## **7. DATA PROTECTION RIGHTS AND REMEDIES**

### **7.1 Data protection rights and remedies**

The detailed rights and remedies of the individuals are set forth in the applicable provisions of the GDPR (especially in articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80, and 82 of the GDPR). The summary set out below describes the most important provisions and the Company provides information for the individuals in accordance with the above articles about their rights and remedies related to the processing of personal data.

The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the individual, information may also be provided orally, provided that the identity of the individual is proven by other means.

The Company will respond without unreasonable delay and by no means later than within one month of receipt to the request of an individual whereby such person exercises his/her rights about the measures taken upon such request (see articles 15-22 of the GDPR). This period may be, if needed, extended by further two months in the light of the complexity of the request and the number of requests to be processed. The Company notifies the individual about the extension also indicating

its grounds within one month of the receipt of the request. Where the request has been submitted by electronic means, the response should likewise be sent electronically unless the individual otherwise requests.

In case the Company does not take any measure upon the request, it shall so notify the individual without delay but by no means later than in one month stating why no measures are taken and about the opportunity of the individual to lodge a complaint with the data protection authority and to file an action with the courts for remedy.

## **7.2 The individual's right of access**

- (1) The individual has the right to obtain confirmation from the Company whether or not personal data concerning him/her are being processed. Where the case is such, then he/she is entitled to have access to the personal data concerned and to the following information:
  - a) the purposes of the processing;
  - b) the categories of personal data concerned;
  - c) the recipients or categories of recipient to whom the personal data have been or will be disclosed including especially recipients in third countries and/or international organisations;
  - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - e) the right of the individual to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the individual or to object to such processing;
  - f) the right to lodge a complaint with a supervisory authority;
  - g) where the personal data are not collected from the individual, any available information as to their source.
- (2) Where personal data are forwarded to a third country, the individual is entitled to obtain information concerning the adequate guarantees of the data transfer.
- (3) The Company provides a copy of the personal data undergoing processing to the individual. The Company may charge a reasonable fee based on administrative costs for requested further copies. Where the individual submitted his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless otherwise requested by the individual.

## **7.3 Right to rectification**

The individual has the right to request that the Company rectify inaccurate personal data which concern him/her without undue delay. In addition, the individual is also entitled to have incomplete personal data completed e.g. by a supplementary statement or otherwise.

## **7.4 Right to erasure ('right to be forgotten')**

- (1) The individual has the right that when he/she so requests, the Company erase the personal data concerning him/her without delay where one of the following grounds applies:
  - (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Company;
  - (b) the individual withdraws consent on which the processing is based, and is no other legal ground subsists for the processing;
  - (c) the individual objects to the processing and there are no overriding legitimate grounds for the processing;
  - (d) the personal data have been unlawfully processed;

- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject;
  - (f) the collection of the personal data occurred in connection with offering services regarding the information society.
- (2) In case the Company has made the personal data public and then it becomes obliged to delete it as aforesaid, then it will, taking into account the available technology and the costs of implementation, take reasonable steps including technical steps in order to inform processors who carry out processing that the individual has initiated that the links leading to the personal data concerned or the copies or reproductions of these be deleted.
- (3) Paragraphs (1) and (2) shall not apply to the extent that processing is necessary, among other things, for:
- a) exercising the right of freedom of expression and information;
  - b) compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject;
  - c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
  - d) the establishment, exercise or defence of legal claims.

#### **7.5 Right to restriction of processing**

- (1) The individual has the right to obtain a restriction of processing from the Company where one of the following applies:
- a) the accuracy of the data is contested by the individual, for a period enabling the Company to verify the accuracy of the personal data;
  - b) the processing is unlawful and the individual opposes the erasure of the personal data and requests the restriction of their use instead;
  - c) the Company no longer needs the personal data for the purposes of the processing, but the individual requires them for the establishment, exercise or defence of legal claims;
  - d) the individual has objected to processing based on the legitimate interest of the Company pending the verification whether the legitimate grounds of the Company override those of the individual.
- (2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with consent of the individual or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
- (3) The Company informs the individual whose request has served as grounds for the restriction based on the aforesaid, before the restriction of processing is lifted.

#### **7.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing**

The Company will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company informs the individual about those recipients if he/she so requests.

#### **7.7 Right to data portability**

- (1) The individual has the right to receive the personal data concerning him/her, which he/she has provided to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company, where:
  - a) the processing is based on consent or on a contract; and
  - b) the processing is carried out by automated means.
- (2) In exercising the right to data portability pursuant to paragraph 1, the individual shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
- (3) Exercising the aforesaid right shall not contravene to provisions concerning the right to erasure ('right to be forgotten') and, further, this right shall not harm the rights and freedoms of others.

## **7.8 Right to object**

- (1) **The individual has the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data concerning him/her for the purposes of legitimate interests. The Company will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual or for the establishment, exercise or defence of legal claims.**
- (2) **Where the processing of personal data serves direct marketing purposes the individual is entitled to object to the processing of personal data regarding him/her for such purposes, including profiling, in so far as the latter relates to direct marketing.**
- (3) In case the individual objects to the processing of personal data with the aim of direct marketing, then the personal data can no longer be processed for this purpose.
- (4) In connection with the use of services related to information society, the individual may refer to his/her right of objection, with deviation from the directive 2002/58/EC, by means of automated devices based on technical prescriptions.
- (5) Where personal data are processed for scientific or historical research purposes or statistical purposes, the individual, on grounds relating to his/her particular situation, has the right to object to processing of personal data concerning him/her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

## **7.9 Right to lodge a complaint with a supervisory authority**

The individual has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the GDPR. In Hungary, the competent supervisory authority is the Hungarian Authority for Data Protection and Freedom of Information (<http://naih.hu/>; 1530 Budapest, Pf.: 5; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu))

## **7.10 Right to an effective judicial remedy against a supervisory authority**

- (1) The individual has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him/her.
- (2) The individual has the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform him/her within three months on the progress or outcome of the complaint lodged.

- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

#### **7.11 Right to an effective judicial remedy against the Company or the processor**

- (1) The individual, without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, has the right to an effective judicial remedy where he/she considers that his/her rights under the GDPR have been infringed as a result of the processing of his/her personal data in non-compliance with the GDPR.
- (2) Proceedings against the Company or a processor shall be brought before the courts of the Member State where the Company or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the individual has habitual residence. Information on the competent courts is available at [www.birosag.hu](http://www.birosag.hu).

# Partner in Pet Food Hungária Kft. Data Protection Notice to Applicants

Latest update: 25 May 2018



## 8. PARTNER IN PET FOOD HUNGÁRIA KFT.

### DATA PROTECTION NOTICE TO APPLICANTS

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#### 1. General provisions, contact details

**Partner in Pet Food Hungária Korlátolt Felelősségű Társaság** (H-2040 Budaörs, Puskás Tivadar utca 14.; [info@ppfeurope.com](mailto:info@ppfeurope.com); +36 1 801 02 03) ("Company") is processing "personal data" (as defined in Article 4.1 of the General Data Protection Regulation 2016/679 of the EU - "GDPR") in connection with applicants ("Applicants") for jobs published on the website <http://www.ppfeurope.com> ("Website") or publicly advertised elsewhere or by other means (by electronically, personally or via post) even in the absence of any publicly announced posts. This data protection notice ("Data Protection Notice") provides the means and other details related to the processing of such personal data and the rights and remedies which the Applicants may have in connection with such data.

The Company reserves the right to unilaterally modify this Notice with subsequent effect, subject to the limitations provided for in the laws and with advance notification to the Applicants in due time, if necessary. The Company may modify this Notice especially when it is required upon changes in the laws, the practice of the data protection authority, business needs or employees' needs or any newly revealed security exposures.

#### 2. Job applications and the processing of the relevant personal data

By submitting his/her job application including all personal data included in it, the Applicant represents and warrants that (i) such data relate to his/her own personal data only, or (ii) he/she has obtained appropriate and informed consent or other adequate legal basis for disclosing the personal data. In case the Company becomes aware that any personal data of a data subject was disclosed without his/her consent or any other appropriate legal basis, then the Company immediately deletes such personal data. The data subject is also entitled to exercise the rights and apply the remedies set forth in this Data Protection Notice. The Company will not bear liability for any loss, damage or harm which may be incurred in connection with a breach of the above representation and warranty made by the Applicant.

The Company may receive personal data also from external companies e.g. from labour agencies. The terms and conditions of such external company will be applicable to the data processing carried out by such external companies and the Company does not exercise control in connection with this. Where the purpose of processing personal data is required for the enforcement of the legitimate interests of the Company or those of a third party, the Company shall - upon a request submitted to the above contact details - provide the balancing test used for establishing such legitimate interest. **The Company wishes to draw the attention of the Applicants to their right of objection to the processing of their personal data due to a cause related to their own situation any time where the processing is based on legitimate interest including the case where the processing takes the form of profiling. In such a case, the Company ceases processing the personal data unless it can prove that the processing has to be continued due to compelling legitimate reasons which override the interests, rights and freedoms of the Applicants or which relate to the submission, the enforcement or the protection of legal claims.**

The Company provides the information in connection with the job applications and the processing of personal data that are included in them as set out below.

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
<p>Processing the personal data of Applicants for the purpose of filling the posts announced by the Company and selected by the Applicants (recruitment), and documenting the selection process.</p>	<p>Article 6.1 (a) of the GDPR (voluntary consent).</p> <p>By submitting his/her application to the Company, the Applicant grants his/her consent for processing his/her personal data. The consent also covers, where applicable, the processing of personal data which the Applicant may reveal in the course of an interview or in connection with the clarification of the content of his/her application, or his/her professional expectations, requirements, possible business-related queries raised or disclosed during interviews, and his/her tasks and competences.</p> <p>The consent of the Applicant is deemed as granted by the submission or forwarding the application to the Company by any means or form (including in particular: sending the application via e-mail, personal submission of a CV at the seat of the Company, or an application to an announced job through the channels as specified in the announcement).</p> <p>The Applicant may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal.</p> <p>The consent is voluntary; however, the job application cannot be assessed</p>	<p>The name and contact details (address, telephone number, e-mail address, and, as the case may be, the LinkedIn or other social media profile contacts, the address of a professional website) of the Applicants, the content of the CV and motivation letter, profile photo attached to the CV, knowledge of foreign languages, information related to previous work experience, place(s) of work, qualifications, skills and education, preferred professional area, references and, where available, expected salary figure. The CVs and applications may include personal data given voluntarily such as the place and date of birth, mother's maiden name, citizenship.</p> <p>The Company may receive such data directly from the Applicant or via third parties (e.g. labour agencies). In the latter case, the terms and conditions of data processing determined by such third party shall also apply to the data processing.</p> <p>The Company prepares internal reports and notes in connection with applications regarding the assessment and the aspects of its assessment.</p>	<p>Until the withdrawal of the consent by the Applicant or, in its absence, the duration while the data are stored is 5 years in accordance with Section 6:22 of the Act V of 2013 on the Hungarian Civil Code ("Civil Code") in case of a possible claim by way of judicial or governmental proceedings against the Company in connection with the job application. This is the time period during which the Applicant may assert a claim in connection with the recruitment process e.g. on the grounds of discrimination. This changes the initial legal basis of the data processing to Article 6.1 (f) of the GDPR. The data processing will be required for the enforcement of a claim of the Company: participation in one or more proceedings related to the enforcement of the claim and presentation of the defence of the Company.</p> <p>In case the Applicant withdraws his/her application before the decision on the selection through one of the contact channels of the Company, then the Company deletes the data of the Applicant. The Company deems the withdrawal of the application as a waiver by the Applicant of any claims in connection with the application.</p> <p>Within the organisation of the Company, the competent person of the area affected by the job application and</p>

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
	<p>without the relevant personal data and in the absence of consent.</p> <p>Application for positions, which require the establishment of a labour relation, Section 10 (1) of the Act I of 2012 on the Labour Code also serves as legal basis. The data and the forms which are material from the aspect of establishing the labour relation can be requested from the employee even prior to the establishment of the employment.</p> <p>In case of a successful selection, the Company notifies the labour agency about the acceptance and the initial terms of compensation of the Applicant according to the terms and conditions of data processing of the agency. The purpose is the calculation of the commission payable for the successful recruitment to the agency. The legal basis of the data transfer is Article 6.1 f) of the GDPR (the legitimate interest of the Company and the agency).</p>		<p>the HR Department have access to the application and the personal data of the Applicant. The Company stores all job applications and the personal data included in them on a server and mailbox system to which the HR Department has exclusive access.</p>
<p>Evaluation of the assessment of the Applicant for the announced job (data processing in connection with the assessment and tests) after the review of the job applications – in accordance with the specifics of the job which is applied for.</p> <p>Professional assessment tests and their assessment occur exclusively in such cases where the Company has so</p>	<p>Article 6.1 (f) of the GDPR (the legitimate interest of the Company). The legitimate interest: carrying out the manufacturing activities of the Company at high standards, compliance with the applicable laws and evaluating professional competences in the light of the aforesaid.</p>	<p>The questions raised with the aim of evaluating assessment strictly relate to the examination of the professional competences that are essential for filling the applied/announced job. The examination is carried out by a professional member of the Company’s own personnel who shall observe confidentiality. In the course of this, such person evaluates the answers</p>	<p>The Company stores the findings of the assessment for a 5-year period starting with the date when the recruitment process closed or the application is reviewed in the light of the possibility of a claim or judicial or government proceeding which the Applicant may initiate against the Company in connection with the job application (Section 6:22 of the Civil Code).</p>

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
<p>decided in advance - if needed for filling particular posts, and the Company notifies the Applicants thereof in advance.</p>	<p>Applicants can ask their questions related to the assessment tests on their venue also in advance of the tests as well as in the course of them. The balancing test is attached to this Data Protection Notice in the form of a table.</p>	<p>given by the Applicant on test forms, online or in the course of an interview. The test forms / the on-line screen allow learning the aspects of the evaluation, or in a personal interview, the aspects are disclosed to the Applicant in advance. The above-mentioned competent person informs the Company exclusively about the findings of the assessments, where applicable, i.e. (i) whether the Applicant has been found suitable for the particular post, or (ii) that the Company should procure that additional pre-requisites are fulfilled e.g. further trainings, or, in case of managerial positions, management trainings should be provided.</p>	
<p>Keeping CVs of other documents related to job applications (e.g. motivation letters) of Applicants in order to make it possible that the Company could contact the Applicant later with an offered job directly (e.g. when a job becomes vacant).</p>	<p>Article 6.1 (a) of the GDPR (voluntary consent). The Company may wish to store the documents of job applications even after the closing of a recruitment process or in the absence of a job vacancy and seek the consent of the Applicant to this with the purpose of making a future offer (e.g. when there is no vacancy in the particular area related to the application of an Applicant but there may be one later). The Applicant may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data</p>	<p>The scope of the data which the Applicant shared with the Company initially.</p>	<p>Until the consent of the Applicant is withdrawn, or in the absence of the aforesaid, for 3 years following the submission of the job application to the Company. In the opinion of the Company, this is time period while the data required to fulfil the purpose of the data processing remain accurate and up-to-date. For example, the actual experience of a particular Applicant may not be sufficient for the job as at the date of the application but the same Applicant may become suitable later to fill a future post. The Applicant may request the deletion of his/her data any time. The Company</p>

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration of the data processing
	<p>processing carried out on the consent granted prior to the withdrawal.  The consent is voluntary; however, the Company cannot directly address the given Applicant with a job offer in the future in the absence of the consent.</p>		<p>deems such a request as a waiver of any claims against the Company in connection with the storage of the documents of the particular job application by the Company.  Within the organisation of the Company, the competent person of the area affected by the job application and the HR Department have access to the application and the personal data of the Applicant. The Company stores all job applications and the personal data included in them on a server and mailbox system to which the HR Department has exclusive access.</p>

### 3. Data security measures applied by the Company

The Company protects the personal data it processes primarily by restricting the access to the information and by the unambiguous regulation of the rights to use them. Only such persons may have access to the systems and instruments used for processing the personal data under this Data Protection Notice whose access is required in order to fulfil the above-mentioned purposes and who are authorised to exercise such access. These persons include e.g. designated team members or departments (e.g. to user data that are required for the use of the employer's IT systems, it is the IT Department authorised to have access).

The Company ensures the safe and legitimate use of the devices which it makes available (including Company-owned computers, laptops and mobile phones), the e-mail boxes and the Internet and the desirable level of consciousness of the employees related to such use by applying the following measures:

- The Company expects that the devices which it made available and which have access to the Internet as well as the e-mail boxes are used by the employees with specific user names and password which are adequately complex and up-dated at determined intervals.
- The Company protects all its systems and devices by fire walls, antivirus software and spam filters. In addition, the Company operates an intrusion protection system (so-called IPS) which enables the detection, blocking and logging of illegitimate attempts of access to the computers systems of the Company.
- The Company makes available safe wired and wireless network access for all devices.
- Remote access to the systems and software of the Company for any device is possible only by safe connection (VPN) by using specific user names and passwords, with mitigation of chances of accidental access (including illegitimate access by the use of stolen or lost devices)
- The IT Department of the Company carries out regular software and system up-dates and back-up saves of data in accordance with its own internal regulations.

As regards the physical protection of data and that of electronic documents, the Company owns locked server rooms and procures that access to a particular document is reserved to adequately authorised persons only (e.g. access to HR documents is reserved to the HR Department).

### 4. Data transfer to other data controllers

The Company may share personal data within its group of companies. The recipients of the data transfers act as independent data controllers. This means that they may determine the purpose of data processing independently or jointly with others (including the Company as the case may be), make decisions and implement them, or have them implemented by a data processor engaged for that purpose, regarding data processing (including the instrument to be used).

The legal basis for data transfer within the group of companies is Article 6.1 (f) of the GDPR (the legitimate interest of the Company).

The legitimate interest: unifying and enhancing the group-level recruitment tasks of the Company and the group members. For example: the employment of a new IT team member by PPF Poland is carried out with the involvement of the IT Department and the IT Department of the PPF company in Hungary. The new team member in Poland will also work together with his/her colleagues located in Hungary and, therefore, it is also the legitimate interest of the company in Hungary that it could evaluate the assessment of the new team member. The affected PPF company processes the data in the job application in accordance with its own Data Protection Notice covering the processing of personal data and in accordance with its own national laws.

The scope of addressees include the following:

**Partner in Pet Food Polska SP.z.o.o.** (seat: ul. Szamocka 8, Warsaw 01-748, Poland, e-mail: [info.pl@ppfeurope.com](mailto:info.pl@ppfeurope.com) website: [www.ppfeurope.com](http://www.ppfeurope.com))

**Partner in Pet Food CZ s.r.o.** (seat: Bucharova 1423/6 158 00 Praha 13 - Nové Butovice, Czech Republic, e-mail: [info@ppfeurope.com](mailto:info@ppfeurope.com), website: [www.ppfeurope.com](http://www.ppfeurope.com))

**Partner in Pet Food SK s.r.o.** (seat: Kračanská cesta 40, 929 01 Dunajská Streda, Slovakia, e-mail: [info@ppfeurope.com](mailto:info@ppfeurope.com), website: [www.ppfeurope.com](http://www.ppfeurope.com))

## **5. Data protection rights and remedies**

### **5.1 Rights and remedies**

The detailed rights and remedies of the individuals, including the Applicants and the persons referred to in point 2 herein (e.g. person who submit a job application on behalf of somebody else), are set forth in the applicable provisions of the GDPR (especially in articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80, and 82 of the GDPR). The summary set out below describes the most important provisions and the Company provides information for Applicants and other affected persons in accordance with the above articles about their rights and remedies related to the processing of personal data.

The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the individual, information may also be provided orally, provided that the identity of the individual is proven by other means.

The Company will respond without unreasonable delay and by no means later than within one month of receipt to the request of an individual whereby such person exercises his/her rights about the measures taken upon such request (see articles 15-22 of the GDPR). This period may be, if needed, extended by further two months in the light of the complexity of the request and the number of requests to be processed. The Company notifies the individual about the extension also indicating its grounds within one month of the receipt of the request. Where the request has been submitted by electronic means, the response should likewise be sent electronically unless the individual otherwise requests.

In case the Company does not take any measure upon the request, it shall so notify the individual without delay but by no means later than in one month stating why no measures are taken and about the opportunity of the individual to lodge a complaint with the data protection authority and to file an action with the courts for remedy.

### **5.2 The data subject's right of access**

- (1) The affected person has the right to obtain confirmation from the Company whether or not personal data concerning him/her are being processed. Where the case is such, then he/she is entitled to have access to the personal data concerned and to the following information:
  - a) the purposes of the processing;
  - b) the categories of personal data concerned;
  - c) the recipients or categories of recipient to whom the personal data have been or will be disclosed;
  - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - e) the right of the affected person to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the affected person or to object to such processing;
  - f) the right to lodge a complaint with a supervisory authority;
  - g) where the personal data are not collected from the data subject, any available information as to their source.
- (2) The Company provides a copy of the personal data undergoing processing to the data subject. The Company may charge a reasonable fee based on administrative costs for requested further copies. Where the affected person submitted his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless otherwise requested by the data subject.

### **5.3 Right to rectification**

The data subject has the right to request that the Company rectify inaccurate personal data which concern him/her without undue delay. In addition, the data subject is also entitled to have incomplete personal data completed e.g. by a supplementary statement or otherwise.

### **5.4 Right to erasure ('right to be forgotten')**

- (1) The affected person has the right that when he/she so requests, the Company erase the personal data concerning him/her without delay where one of the following grounds applies:
  - a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by the Company;
  - b) the affected person withdraws consent on which the processing is based, and is no other legal ground subsists for the processing;
  - c) the affected person objects to the processing and there are no overriding legitimate grounds for the processing;
  - d) the personal data have been unlawfully processed;
  - e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject;
  - f) the collection of the personal data occurred in connection with offering services regarding the information society.
  
- (2) Paragraph (1) shall not apply to the extent that processing is necessary, among other things, for:
  - a) exercising the right of freedom of expression and information;
  - b) compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject;
  - c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
  - d) the establishment, exercise or defence of legal claims.

### **5.5 Right to restriction of processing**

- (1) The affected person has the right to obtain a restriction of processing from the Company where one of the following applies:
  - a) the accuracy of the personal data is contested by the affected person, for a period enabling the Company to verify the accuracy of the personal data;
  - b) the processing is unlawful and the affected person opposes the erasure of the personal data and requests the restriction of their use instead;
  - c) the Company no longer needs the personal data for the purposes of the processing, but the affected person requires them for the establishment, exercise or defence of legal claims;
  - d) the affected person has objected to processing based on the legitimate interest of the Company pending the verification whether the legitimate grounds of the Company override those of the affected person.
  
- (2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with consent of the affected person or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
  
- (3) The Company informs the affected person whose request has served as grounds for the restriction based on the aforesaid, before the restriction of processing is lifted.

## **5.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing**

The Company will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company informs the affected person about those recipients if he/she so requests.

## **5.7 Right to data portability**

- (2) The individual has the right to receive the personal data concerning him/her, which he/she has provided to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company, where:
  - b) the processing is based on consent or on a contract; and
  - c) the processing is carried out by automated means.
- (3) In exercising the right to data portability pursuant to paragraph 1, the individual shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
- (4) Exercising the aforesaid right shall not contravene to provisions concerning the right to erasure ('right to be forgotten') and, further, this right shall not harm the rights and freedoms of others.

## **5.8 Right to object**

- (1) The affected person has the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data concerning him/her for the purposes of legitimate interests. The Company will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the affected person or for the establishment, exercise or defence of legal claims.
- (2) Where personal data are processed for scientific or historical research purposes or statistical purposes, the affected person, on grounds relating to his/her particular situation, has the right to object to processing of personal data concerning him/her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

## **5.9 Right to lodge a complaint with a supervisory authority**

The affected person has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the GDPR. In Hungary, the competent supervisory authority is the Hungarian Authority for Data Protection and Freedom of Information (<http://naih.hu/>; 1530 Budapest, Pf.: 5.; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu))

## **5.10 Right to an effective judicial remedy against a supervisory authority**

- (1) The affected person has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him/her.
- (2) The affected person has the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform him/her within three months on the progress or outcome of the complaint lodged.
- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

## **5.11 Right to an effective judicial remedy against the Company or the processor**

9. The affected person, without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, has the right to an effective judicial remedy where he/she considers that his/her rights under the GDPR have been infringed as a result of the processing of his/her personal data in non-compliance with the GDPR.
10. Proceedings against the Company or a processor shall be brought before the courts of the Member State where the Company or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the affected person has habitual residence. You can find information on the competent courts at [www.birosag.hu](http://www.birosag.hu).

### Schedule

#### The balancing test carried out by the Company in relation to assessments

The table below describes the test which the Company carries out with respect to the processing of the personal data of Applicants in order to evaluate the balance between interests i.e. whether the legitimate interests of the Company override the interests and fundamental rights and freedoms of the Applicants which make the protection of personal data necessary.

<b>1. Whether carrying out the examination of assessment of Applicants who have submitted applications for the jobs concerned is inevitably necessary? Are alternative solutions for the same available which may serve the same purpose without processing personal data?</b>	<p>No data processing solution is available which would affect the personal data of the subject to a lesser extent while serving the purposes of the data processing with similar efficiency.</p> <p>In the light of the manufacturing activities of the Company (i.e. producing pet food) and the required high standard product quality, the safety of persons and assets, compliance with occupational and health-related safety, it is inevitably needed to carry out assessments in the course of recruitment-related interviews in order to evaluate certain professional competences that are required for certain jobs.</p> <p>In the light of the above, the assessments concern the particular applicants exclusively who submitted applications for certain jobs which the Company had announced.</p>
<b>2. The legitimate interest of the Company</b>	<p>The following are the legitimate interests of the Company:</p> <ul style="list-style-type: none"><li>- carrying out product manufacturing by the Company continuously, safely and in a compliant manner to meet high quality standards;</li><li>- compliance with the legal provisions and industrial standards and regulations regarding product quality, safety regulations regarding persons and assets, work safety as well as the safety of human and animal health;</li><li>- taking the above interests into account, for filling managerial and certain specialist posts (e.g. product development and controlling) evaluation of certain professional competences is inevitably needed.</li></ul>
<b>3. What is the purpose of processing data? What kind of personal data need to be processed and for how long in the light of the legitimate interests in question?</b>	<p>The purpose of processing data is the evaluation of the Applicant's assessment for the job he/she has applied for.</p> <p>The Company is processing exclusively the findings of the assessments i.e. the fact whether the Applicant is suitable for the particular job or whether further requirements need to be satisfied with the participation of the Company for filling the job and to ascertain that these requirements are met, e.g. further professional education, trainings, to facilitate managerial trainings where those are needed to fill management positions.</p> <p>The assessment of the Applicant's answers given in forms / on-line screen / or in the course of interviews are exclusively carried out by a competent person engaged by the Company as a member of its own personnel who is obliged to observe confidentiality.</p>

	<p>Before starting the assessments, the Company informs the affected Applicants in each case about the need to carry out the examination, the examined professional competences and the means of the examination process, their rights and remedies and the Company procures that they may become familiar with those in advance through the aforesaid channels.</p>
<p><b>4. Which are the interests of the affected persons with respect to the data processing?</b></p>	<p>Respecting the privacy rights, the rights and freedoms attaching to their personal data. The Company takes this into account to the most possible extent even at the time when the assessment tests concerned were prepared and at the selection of the competent team member who belongs to the personnel of the Company.</p>
<p><b>5. Why does the legitimate interest of the Company override the rights and freedoms of the affected persons proportionately?</b></p>	<ul style="list-style-type: none"> <li>- The Company carries out assessments in connection with certain particular jobs only (in case, especially, of management positions and those in certain critical areas);</li> <li>- The purpose of the assessments is the evaluation of professional competences that are required for particular jobs; the aim is not the assessment of personal competences, in general;</li> <li>- Before starting the assessments, the Company informs the Applicants that assessments are needed, about the examined competences and the examination process as well as their rights and available legal remedies;</li> <li>- The Applicants have the right to ask questions from the Company before and during the assessments;</li> <li>- Only team members of the Company's own personnel have authority to learn the content of and handle the paper-based or on-line test sheets and the summary report prepared by a competent person about the answers given in the course of the interviews;</li> <li>- While the test sheets and the answers given in the course of the interview are evaluated only the given answers are taken into account i.e. other attributes and circumstances (e.g. the handwriting) are not considered;</li> <li>- The Company is accessing and handling only the findings of the examinations i.e. the fact whether or not the Applicant has been found suitable to fill the particular post and whether further requirements need to be satisfied for filling the job and, if so, which those requirements are;</li> <li>- Within the organisation of the Company, only the competent person of the area affected by the application and those of the HR Department can have access to the findings of the assessments.</li> </ul>

**9. Cookie Policy**  
**Partner in Pet Food Hungária Korlátolt Felelősségű Társaság**  
**Last modified: May 25, 2018**

1. **Partner in Pet Food Hungária Korlátolt Felelősségű Társaság** (registered seat: H-2040 Budaörs, Puskás Tivadar utca 14.; company registration No: 13-09-090774; e-mail: [info@ppfeurope.com](mailto:info@ppfeurope.com); telephone: +36 1 801 02 03) ("**Company**") is using cookies in certain areas of <http://www.ppfeurope.com/>. Cookies are files that store information on the users' web browser. This Cookie Policy („**Policy**") provides information on the use of cookies.
2. Cookies, for example, allow the website to recognise the user when a user has visited the site earlier, or help identify which part of the site is the most popular, which parts the users are visiting, and for how long they stay there. By analysing this kind of information, the Company can adjust the website to the needs of users and can provide a more diverse users experience. By the help of cookies the Company can also ensure that the information that is displayed on a user's next visit will meet the users' expectations.
3. The Company reserves the right to modify this Policy unilaterally with effect subsequent to such modification, subject to the limitations provided for in the laws and with advance notification to the Applicants in due time, if necessary. The Company may modify this Policy especially when it is required upon changes in the laws, the practice of the data protection authority, business needs or employees' needs or any newly revealed security exposures. Upon request, the Company will send a copy of the latest updated version of this Policy to individuals.
4. The users can configure their web browser to accept all cookies, reject all cookies, or notify the user when a cookie is sent to the user's computer. Each web search is different so the „Help" menu in the search engine can help users change cookie settings. For more information on the nature of cookies and to disable them, visit <http://www.youronlinechoices.com/hu/>. The <http://www.ppfeurope.com/> website is designed to work with cookies so turning them off can affect the usability of the site and prevent the user from taking advantage of all of it.
5. For most frequently used browsers menu options for managing cookies:  
  
Mozilla Firefox:  
<https://support.mozilla.org/t5/Cookies-and-cache/Enable-and-disable-cookies-that-websites-use-to-track-your/ta-p/2784>  
Google Chrome:  
<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>  
Internet Explorer:  
<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>  
  
Google Analytics provides additional ways to unsubscribe from Google Analytics services:  
<http://tools.google.com/dlpage/gaoptout?hl=en-GB>.
6. The Company provides the list of the cookies used by the Company in the table below. In addition, the Company can also identify technically whether the user has previously accepted this Policy.

Name of Cookie	Type	Why it is necessary for the website and what functionality does it offer to the user?  What data are accessible?	Lifetime
<b>CAKEPHP</b>	The cookie used by the Company (first party cookie).	The purpose of the cookie is to identify the user. The Company stores the language chosen by the users and the time spent on the Company's website. The Company does not record what other website are visited at by the user.	During the user's operations on the site (session). Cookies configured for this purpose are automatically deleted by closing the web page.
<b>_gat_UA-#</b>	The cookie used by the company's service provider (third party cookie).	The cookie allows to count the visits and traffic resources on the website to measure and improve the performance of the website using Google Analytics. Further information: <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>	1 minute