

**PRIVACY NOTICE (“NOTICE”) RELATED TO DATA PROCESSING AFFECTING
APPLICANTS FOR THE POSITIONS ADVERTISED BY
ALDI INTERNATIONAL IT SERVICES KFT.**

Last modification: 15 September 2023

1. GENERAL PROVISIONS AND CONTACT DATA

ALDI International IT Services Kft. (registered seat: 2051 Biatorbágy, Mészárosok útja 2.; company registration number: 13-09-191666; “**Company**”) processes certain information qualifying as “*personal data*” within the meaning of Article 4 (1) of the EU General Data Protection Regulation No. 2016/679 (“**GDPR**”) in relation to the candidates for the advertised positions.

This Notice contains the Company’s processing activities concerning the candidates for positions as data subjects (“**Data Subjects**”) in accordance with Articles 13 and 14 of the GDPR.

This Notice does not affect the other privacy notices of the Company.

Registered seat of the Company: 2051 Biatorbágy, Mészárosok útja 2.
Company registration number of the Company: Cg. 13-09-191666
The Company’s email address for data protection issues: adatvedelem@aldi.hu

2. PROCESSED DATA AND PURPOSES OF PROCESSING

The processed data, the purposes of processing, the legal basis for processing, the duration of processing and the persons entitled to access the data are presented in the following table.

Description and purpose of processing	Legal basis of processing	Scope of data processing	Duration of data processing	Who can access the personal data within the Company's organisation?
<p><u>1. In the HR Suite system, use of the SAP, SF and Recruiting modules for registering the Data Subjects applying for positions</u></p>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: conducting the Company's recruitment activity smoothly, accompanying the selection process.</p>	<p>In relation to the Data Subject applying for the position, his/her name, contact details, email address, phone number, photo, education, previous workplaces/positions, wage expectations.</p>	<p>1 year. After 1 year, all personal data registered in relation to the applicants will be anonymised in the HR Suite system automatically.</p>	<p>Managers and professional employees concerned in the selection process, employees of the HR Recruitment department in Biatorbágy, Budapest and Pécs.</p>
<p><u>2. Handling of incoming CVs and cover letters</u></p>	<p>Prior to concluding the employment agreement, concerning the data required for taking the steps requested by the Data Subject and for assessing the application:</p> <p>pursuant to Article 6 (1) (b) of the GDPR, data processing for taking the steps requested by the Data Subject prior to concluding the contract, including the creation of the application profile required for the application on the career site at https://karrier.aldi.hu ("Career Site").</p> <p>Further use of the Data Subject's data in relation to sending further job offers:</p>	<p>Name, place and date of birth, address, place of stay, email, mobile phone number, qualifications, education, language knowledge and its level, potential photo, in certain cases LinkedIn or other social media contact details, address of professional website, CV and contents of cover letter, data related to previous work experiences, education, preferred field of expertise, references, expected monthly wage, personal data related to the clarification of the Data Subject's application at the interview, as well as to the professional expectations, requirements, potential professional issues, tasks and competences communicated by the Data Subject applicant during the job interview, internal notes concerning the Data</p>	<p>The application profile created on the Career Site will be deleted within 1 year following the last activity of the Data Subject applicant.</p> <p>If the Data Subject applicant gave his/her consent to future communication in relation to other job offers, then the personal data provided in the specific application will be deleted at the end of the 1st year following the rejection of the original application.</p> <p>Following the closing of the selection process, the personal data will be deleted after 5 years pursuant to Section 6:22 of the Civil Code for the defence of legal claims</p>	<p>Managers and professional employees concerned in the selection process, employees of the HR Recruitment department in Biatorbágy and Budapest</p>

Description and purpose of processing	Legal basis of processing	Scope of data processing	Duration of data processing	Who can access the personal data within the Company's organisation?
	pursuant to Article 6 (1) (a) of the GDPR, the data subject's consent given on the Career Site.	Subject applicant's suitability and its assessment criteria, name, position and contact details of the reference persons related to his/her previous or current workplace.	potentially established in relation to the application.	
3. <u>HR Microsoft Teams Channels for information exchange concerning the status of the selection process</u>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: conducting the Company's recruitment activity smoothly, accompanying the selection process.</p>	Name and status of the selection process concerning the applicant Data Subject.	Limitation period of 5 years pursuant to Section 6:22 (1) of Act V of 2013 on the Civil Code ("Civil Code").	Employees having access to Teams Groups: manager participating in selection, members of the training team, payroll accounting team, members of the TS team
4. <u>Storage of notes prepared during job interview in One Note software</u>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: conducting the Company's recruitment activity smoothly, accompanying the selection process.</p>	Notes prepared during the job interviews with Data Subjects applying for the job.	Civil law limitation period of 5 years pursuant to Section 6:22 (1) of the Civil Code.	Recruiter conducting the job interview.
5. <u>Documenting the written offer sent to the successful applicant Data Subject in One Drive folder</u>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: conducting the Company's</p>	In relation to the applicant Data Subject, the name and the wage data concerning the offered wage.	Temporary storage, until the written offer is sent to the successful Data Subject applicant.	Recruiter conducting the selection process with the successful Data Subject applicant.

Description and purpose of processing	Legal basis of processing	Scope of data processing	Duration of data processing	Who can access the personal data within the Company's organisation?
	recruitment activity smoothly, accompanying the selection process.			
6. <u>Registration of the successful applicant Data Subject in "New Entrant" report</u>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: conducting the Company's recruitment activity smoothly, accompanying the selection process.</p>	<p>In relation to the successful applicant Data Subject, name, start date, wage data according to classification level (not quantified)</p>	<p>1 year</p>	<p>Recruiter conducting the selection process with the successful Data Subject applicant.</p>
7. <u>Documentation of rejected job offers</u>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: preparing statistics, summarising information and lessons learned about the selection process.</p>	<p>In relation to the applicant Data Subject: name, brief explanation of rejecting the job offer (pl. "counter offer").</p>	<p>1 year</p>	<p>Employees of the HR department.</p>
8. <u>Recruitment on the Social Media sites of the HR department (e.g. Profession.hu, LinkedIn)</u>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: conducting the Company's recruitment activity smoothly, searching and</p>	<p>Name, data provided online voluntarily in relation to the professional CV (e.g. education, professional experiences, relevant skills, spoken languages), email address, mobile phone number.</p>	<p>1 year</p>	<p>Employees of the HR department.</p>

Description and purpose of processing	Legal basis of processing	Scope of data processing	Duration of data processing	Who can access the personal data within the Company's organisation?
	selecting the most suitable workforce for the open positions.			
<p>9. <u>Recruitment on the basis of purchased databases (e.g. from Profession.hu website)</u></p>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: conducting the Company's recruitment activity smoothly, searching and selecting the most suitable workforce for the open positions.</p> <p>The source of the personal data is not the data subject directly, and therefore, upon the commencement of recruitment, the Company informs the data subject on the source of the processed personal data during the first communication.</p>	<p>Contents of the purchased database, typically name, data provided online voluntarily in relation to the professional CV (e.g. education, professional experiences, relevant skills, spoken languages), email address, mobile phone number.</p>	<p>1 year</p>	<p>Employees of the HR department.</p>
<p>10. <u>Electronic communication with applicants by email via Microsoft Outlook software</u></p>	<p>Pursuant to Article 6 (1) (b) of the GDPR, data processing is required for taking the steps requested by the Data Subject prior to concluding the contract.</p>	<p>Name, email address, personal data provided during correspondence.</p>	<p>After 1 year following the closing of the selection procedure, the employees of the HR department will delete the data manually from the mailing system.</p>	<p>Employees of the HR department.</p>

Description and purpose of processing	Legal basis of processing	Scope of data processing	Duration of data processing	Who can access the personal data within the Company's organisation?
<p>11. <u>Mandating recruitment agencies to perform recruitment, selection and workforce placement tasks</u></p>	<p>The Company's legitimate interest pursuant to Article 6 (1) (f) of the GDPR.</p> <p>Legitimate interest: conducting the Company's recruitment activity smoothly, searching and selecting the most suitable workforce for the open positions.</p>	<p>Personal data of the applicant Data Subject uploaded by the recruitment agency to HR Suite: Name, contact details, email address, phone number, photo, education, previous workplaces/positions, wage expectations.</p>	<p>In relation to the establishment of civil law claims and the fulfilment of obligations, the duration of data retention is 5 years following the termination of the civil law legal relationship with the Data Subject pursuant to Section 6:22 (1) of the Civil Code.</p>	<p>Employees of the HR department.</p>

3. PARTIES ENTITLED TO PERFORM PROCESSING

For performing the technical tasks related to data processing operations, the Company employs the processors listed in the following table. The rights and obligations of the processors concerning the processing of personal data are stipulated by the GDPR, and by the Company as the controller within the frameworks of a separate act governing processing. The Company as the controller shall be liable for the lawfulness of the instructions given by it. The processor shall not make any decision on the merits of processing, may only process the personal data it becomes aware of in accordance with the instructions of the Company as the controller, may not perform processing for its own purposes, and shall store and retain personal data in accordance with the instructions of the Company as the controller.

Processor	What kind of personal data may the processor access?	For how long may the processor store the data?	In relation to which processing?
ALDI Magyarország Élelmiszer Bt. registered seat: 2051 Biatorbágy, Mészárosok útja 2. company registration number: 13-06-058506 phone: + 36 23 533 500 email address: adatvedelem@aldi.hu	Data specified in Section 2.1	Until the end of the retention period specified in Section 2.1.	In relation to processing specified in Section 2.1
Microsoft Ireland Operations Ltd. registered seat: One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland phone: + 353 (01) 4502113 online contact details: https://support.microsoft.com/contactus/	Data specified in Sections 2.3, 2.4, 2.5 and 2.10	Until the end of the retention period specified in Sections 2.3, 2.4, 2.5 and 2.10.	In relation to processing specified in Sections 2.3, 2.4, 2.5 and 2.10.

4. DATA TRANSFER TO OTHER CONTROLLERS

The Company transfers personal data to the following companies. The companies act as controllers, which means that they may, individually or jointly with others (including, where applicable, the Company), determine the purposes for which personal data are processed, make and implement decisions regarding the processing (including the means) or have them implemented by a processor they employ.

Recipients of data transfer	Legal basis of data transfer	In what manner does it use the data (what activity does it perform) and for how long?	In relation to which processing?
Meta Platforms Ireland Ltd. 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland	Joint controller in relation to ALDI Career Facebook site, as	In accordance with the privacy notice of Meta Platforms Ireland, available here:	In relation to processing specified in Section 2.8

Recipients of data transfer	Legal basis of data transfer	In what manner does it use the data (what activity does it perform) and for how long?	In relation to which processing?
	the operator of Facebook and Messenger apps.	https://www.facebook.com/privacy/explanation/	
LinkedIn Ireland Unlimited Company Wilton Plaza, Wilton Pl, Dublin, 2, Ireland	Joint controller in relation to ALDI Hungary's LinkedIn site.	In accordance with the privacy notice of LinkedIn Ireland, available here: https://www.linkedin.com/legal/privacy-policy	In relation to processing specified in Section 2.8
SWICON Zrt. registered seat: 1031 Budapest, Záhony utca 7. company registration number: 01-10-046053 phone: + 36 1 883 9860 Online contact form: https://swicon.com/en/contact	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
Grafton Recruitment Kft. registered seat: 1053 Budapest, Károlyi utca 12. phone: +06 1 235 2600 email: info@grafton.hu	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
Green Fox Academy registered seat: 1062 Budapest, Andrásy út 66. phone: +36 70 350 0800 email: hello@greenfoxacademy.com	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
Hays Hungary Kft. registered seat: 1054 Budapest, Szabadság tér 7. phone: +06 1 501 2400 email: customerservice@hays.hu	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
Job Capital registered seat: 7621 Pécs,	Legitimate interest of the Company	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11

Recipients of data transfer	Legal basis of data transfer	In what manner does it use the data (what activity does it perform) and for how long?	In relation to which processing?
Rákóczi út 17. phone: +36 72 223 223 email: info@jobcapital.hu	specified in Article 6 (1) (f) of the GDPR.		
Kelly Services Hungary Kft. registered seat: 1134 Budapest, Váci út 35. 3. em. 3.4. ajtó phone: +36 1 301 7800 email: info@kellyservices.hu	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
MP Solutions Kft. registered seat: 1088 Budapest, Bródy Sándor utca 2. 2. em. 8B. ajtó phone: +36 1 429 0029 email: info@mps.hu	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
Randstad Hungary Kft. registered seat: 1134 Budapest, Dózsa György út 146-148. A. ép. 3. em. phone: +36 1 619 4243 email: info@randstad.hu	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
Secure Invest Hungary Kft. registered seat: 8055 Balinka, Petőfi Sándor utca 48/1. phone: +36 30 662 4060 email: gantulga.consulting@gmail.com	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
AppZone Kft (Simplejob) registered seat: 4028 Debrecen Kassai út 131/A phone: + 36 30 902 3238 email: hello@simplejob.com	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR.	In relation to and for the period specified in Section 2.11	In relation to processing specified in Section 2.11
Courts, authorities, persons authorised to investigate	Legitimate interest of the	According to the requirements and for the	From among the processing specified in

Recipients of data transfer	Legal basis of data transfer	In what manner does it use the data (what activity does it perform) and for how long?	In relation to which processing?
workplace accidents and other events	Company specified in Article 6 (1) (f) of the GDPR.	period applicable to courts, authorities, persons authorised to investigate workplace accidents and other events.	the table in Section 2, in the events where the data are transferred to the recipient on the basis of the Company's legitimate interest.
Hungarian Branch of CMS Cameron McKenna Nabarro Olswang LLP registered seat: 1053 Budapest, Károlyi utca 12. phone: +36 (1) 483 48 00 online contact details: https://cms.law/en/hun/office/budapest	Legitimate interest of the Company specified in Article 6 (1) (f) of the GDPR. Legitimate interest: during the investigation of the escalation events, establishment, exercise and defence of the Company's legal claims	In the manner required for the performance of the service contract concluded between the Company and the Hungarian branch of CMS Cameron McKenna Nabarro Olswang LLP, for the period specified in the contract.	From among the processing specified in the table in Section 2, in the events where the data are transferred to the recipient on the basis of the Company's legitimate interest.

5. RIGHTS OF THE DATA SUBJECTS RELATED TO PROCESSING

The data protection rights and legal remedies of the Data Subjects and the limitations thereof are detailed in the GDPR (in particular Articles 12-22., 77., 79. and 82. of the GDPR). Data Subjects may request information about their data at any time, request access to or the rectification, erasure of their data or the restriction of processing, or they may object to processing based on legitimate interest. In the following section we give a summary of the main provisions relating to the data protection rights and remedies of Data Subjects.

Within the frameworks of this Notice, the Company specifically draws your attention to the fact that the Data Subject may object at any time, on grounds relating to his/her particular situation, to the processing of his/her personal data on the basis of the Company's legitimate interest. In such case, the Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims. Concerning the data processed on the basis of the Company's legitimate interest [Article 6 (1) (f) of the GDPR], the Data Subjects are entitled to request the Company to present a so-called interest assessment test in relation to the establishment of the legitimate interest, which contains in detail why the Company's interests override, and how and to what extent limit the interests, rights and freedoms of the Data Subject for the given processing operation.

5.1 Right of information

Where the Company processes personal data relating to the Data Subject, the Company shall provide the Data Subject with information, even without the Data Subject's request, on the most important features of the processing, such as the purpose, legal basis, duration of the processing, the identity and contact details of the Company and its representative, the recipients of the personal

data, as well as the Data Subject's rights and remedies with regard to the processing (including the right to lodge a complaint with a supervisory authority) and, where the Data Subject is not the source of the data, on the source of the personal data and the categories of personal data concerned, if the Data Subject does not already have this information. The Company provides this information by making this Notice available to the Data Subject.

5.2 Right of access

The Data Subject shall have the right to obtain from the Company confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to the personal data and certain information related to processing, including the purposes of the processing, the categories of personal data concerned, the recipients of the personal data, the (envisaged) duration of the processing, the rights and remedies of the Data Subject (including the right to lodge a complaint with a supervisory authority) and, where the data are not collected from the Data Subject, information about their source.

Upon the Data Subject's request, the Company shall provide the Data Subject with a copy of the personal data undergoing processing. For any further copies requested by the Data Subject, the Company may charge a reasonable fee based on administrative costs. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

The Company will provide information on the possibility and the manner of issuing a copy, the costs, if any, and other details at the Data Subject's request.

5.3 Right to rectification

The Data Subject shall have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning the Data Subject. Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

5.4 Right to erasure

The Data Subject shall have the right to obtain from the Company the erasure of personal data concerning him/her without undue delay and the Company shall have the obligation to erase personal data without undue delay where certain grounds apply. The Company shall have the obligation to erase the personal data of the Data Subject upon his/her request where the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing; the personal data have been unlawfully processed; the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing; 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.

The above shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the Company is subject;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- d) for the establishment, exercise or defence of legal claims.

5.5 Right to restriction of processing

The Data Subject shall have the right to obtain from the Company restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject, for a period enabling the Company to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject 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 they are required by the Data Subject for the establishment, exercise or defence of legal claims; or
- d) the Data Subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the Data Subject.

Where processing has been restricted under the above sections, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent 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.

The Data Subject who has obtained restriction of processing pursuant to the above shall be informed by the Company before the restriction of processing is lifted.

5.6 Right to object and automated decision-making

The data subject shall have the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data on the basis of the Company's legitimate interest. In such case, the Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

5.7. Right to data portability

If the processing of personal data is based on the data subject's consent or is carried out in order to fulfill a contract concluded with the data subject, the data subject is entitled to request the release of the data in a widely used, machine-readable format, or upon request, the data will be transmitted directly to the data controller indicated by the data subject for, if the technological conditions for this exist.

5.8. Frameworks of exercising rights

The Company shall inform the Data Subject on the measures taken as a result of the request related to the aforesaid rights without unnecessary delay, within one month following the receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, such deadline may be extended by another two months. The Company will inform the Data Subject on the extension of the deadline within one month following the receipt of the request, indicating the reasons for the delay. If the Data Subject has submitted the request electronically, the information will be provided electronically where possible, unless the Data Subject requests otherwise.

If the Company does not take action on the request of the Data Subject, it shall inform the Data Subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the competent data protection authority.

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

The Data Subject shall have the right to lodge a complaint with a supervisory authority if the Data Subject considers that the processing of personal data relating to him/her infringes the provisions of the GDPR. In Hungary, the supervisory authority is: Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest Falk Miksa u. 9-11.; phone: +36 1 391 1400; Fax: +36-1-391-1410, email: ugyfelszolgalat@naih.hu; website: <http://naih.hu/>), and the Data Subject has right to judicial remedy. The Data Subject has right to an effective judicial remedy against the legally binding decision of the supervisory authority. Furthermore, the Data Subject has right to an effective judicial remedy if the competent supervisory authority fails to take action on his/her complaint, or fails to notify the Data Subject within three months of the development or results of the procedure concerning the filed complaint.

In addition to the above, the Data Subject has right to an effective judicial remedy. Such lawsuits are subject to tribunal competence, which may be initiated by the Data Subject before the competent tribunal at his place of residence or place of stay, at his/her own discretion. The competences and contact details of the courts (tribunals) can be found on the following website: www.birosag.hu.

6. READING, ACCESSING AND AMENDMENT OF THIS NOTICE

This Notice is made available to the Data Subjects in electronic form.

The Company reserves the right to amend or withdraw this Notice unilaterally, with immediate effect following the amendment, at its own discretion anytime, in accordance with the effective legal regulations. This Notice may be amended, in particular, if necessary due to changes in legal regulations, practices of the data protection authority, business needs or newly identified security risks.

Biatorbágy, 15 September 2023

ALDI International IT Services Kft.