

**PRIVACY POLICY**  
**skitus.com**

**About this policy**

This Privacy Policy is meant to inform you about the most important features of the SKITUS Group's data processing activities, the data processing on [skitus.com](https://skitus.com) website, and how we ensure the protection of your personal data.

**Our policy**

We will only process your personal data in accordance with the applicable data protection law, and our privacy policy is also in line with the Act of Freedom of Information 2011. CXII. (Info Act) and the regulation (GDPR) 2016/679 of the European Parliament and Council (EU).

**Your personal data – What does it mean?**

Personal data mean any information that relates to an identified or identifiable natural person; We can identify the natural person who can be assigned directly or indirectly to a criterion such as a name, an identification number, such as your name, telephone number, email address, IP address, etc.

**Who are we?**

SKITUS is a group of companies engaged in temporary work and temporary assignment of employees. The SKITUS group comprises the following companies:

The members of the group are joint controllers for the processing of data during the operation of this website. For the other processing of data contained in this policy, it is indicated by data processing if it is not an individual but a joint data processing.

Please contact SKITUS in your place of residence if you have any further questions regarding the contents of this policy or the processing of your personal data that you have already provided:

The data controller involved in this policy is:

**SKITUS Industries Kft.**

2-4, Építők street  
Budaörs, 2040  
Hungary  
Registration number: 13-09-202447

**Skitus Project Engineering Kft.**

2-4, Építők street  
Budaörs, 2040  
Hungary  
Registration number: 13-09-201701

**SKITUS Project Engineering s.r.o. (CZ)**

třída Kpt. Jaroše 1922/3  
602 00 Brno – Černá Pole  
Czech Republic  
Registration number: 05589789

**SKITUS Automotive s.r.o. (SK)**

Sídlo:  
94613

Okolicná na Ostrove (Slovakia)  
Okolicná na Ostrove 437.  
Registration number: 44269544

(hereinafter jointly and separately referred to as: „SKITUS”)

**Contact information on data processing issues:**

postal mailing address: according to headquarters  
email address: **adat@skitus.com**, **czoffice@skitus.com**, **info@skitus.com**  
telephone: **HU** +36 23 788 308, **SK** +421 903 181 265, **CZ** +420 564 565 700

**Why do we process data?**

We primarily collect and use your personal data for the following purposes:

1. Contacts: website form, email, telephone;
2. Job application, registration to career database;
3. Creating, fulfilling and maintaining contracts;
4. Cookies;

We provide information about our data processing not described in this policy separately, with respect to data processing, data security, contact details of data controllers for the rights to which they are subject are also governing.

**Data processing regarding contacts**

If you contact us with any of your questions, we will process your personal data in a message, email, postal mail or telephone to respond to your inquiry, to have a contact with you. The processing is of legitimate business interest (point (f) of paragraph 1 of GDPR 6. Art.) to be able to record, respond to, and use the message exchange in connection with claims.

Through the ' Contact ' section, you can contact us by entering your name and email address with which we process your name and email address and any additional personal information in the message (including, in particular, contact details of the interested party or other person concerned and the circumstances in which the interested party approached us). Your message arrives at info@skitus.com email address with limited numbers of controllers with access.

In case of inquiry via phone, we will process your personal data if you need to contact us further, in which case your telephone number and, if necessary, the date and time of the conversation will be recorded.

In the case of a letter sent by post, we also record the sender's address and the date of delivery of the letter.

Any personal data (including emails) processed in connection with the inquiry will be deleted after the purpose of the processing is expired. Thus, if it is expected that the email and the reply to it are not necessary for further administration and enforcement of claim, the deletion will be effected immediately, otherwise the cancellation of the inquiry and the reply shall be deleted 5 years from the date of providing data.

**Data processing regarding job application, registration to career database**

Detailed information on the processing of applications for jobs are available at the following links:

Information on data processing of temporary work applications:

[https://skitus.com/KOLCSONZES\\_adatkezelesi\\_tajekoztato.docx](https://skitus.com/KOLCSONZES_adatkezelesi_tajekoztato.docx)

Information on data processing of technical engineer jobs candidates:

[https://skitus.com/MERNOK\\_adatkezelesi\\_tajekoztato.docx](https://skitus.com/MERNOK_adatkezelesi_tajekoztato.docx)

Information on data processing of candidates for internal office work in SKITUS:

[https://skitus.com/BELSO\\_adatkezelesi\\_tajekoztato.docx](https://skitus.com/BELSO_adatkezelesi_tajekoztato.docx)

### **Data processing regarding creating, fulfilling and maintaining contracts**

This section applies to contracts concluded in the framework of our business activities, i.e. contracts we conclude with our clients or subcontractors, cooperating partners and suppliers. Employment contracts are not covered by this point.

In the case of contracts subject to this point, personal data may be processed on the one hand if the contracting partner is an individual or self-employed person which necessarily involves the processing of personal data. In this case, all data related to, or in connection with the contract shall be considered as personal data of our partner. In case our contracting partner is a company (legal entity), personal data processing will essentially be effected with the data of the contact person designated by the partner.

In case our contracting party is a natural person or a self-employed person (whether it is a contractor or a supplier), the purpose of the processing of personal data is to create, register and fulfil the contract.

If there is a contract that is subject to an invoicing requirement, in case of a natural person and a self-employed person, data related to the issued invoice shall also be deemed to be personal data, the purpose of which is to manage the compliance with our statutory accounting obligations (issue of invoice, invoice preservation).

In the performance of a contract with a natural person or self-employed person, the purposes of the processing shall also cover any warranty or warranty claims or other disputes.

In case our contracting partner is a company (including all legal entities), personal data may be processed in relation to the personal information of a contact person. The purpose of the processing of personal data of the contact person and of the third parties concerned by the subject of the contract is the smooth establishment and fulfilment of the contract and its renewal.

In the case of a contract with a natural person and a self-employed person, we need personal data to conclude and fulfil the contract, so providing such information is a prerequisite for concluding the contract (the legal basis of the processing is the GDPR Article 6 (1) (b)). This data is basically processed under the general limitation period of 5 years (Civil Code 6:22) and will be deleted without special request after its expiry.

In addition, in the case of a natural person or a self-employed person, personal data will be processed on the basis of an obligation under the following legislation (article 6 (1) (c) GDPR): In case of obligation for the issue or retention of an invoice, data of the invoice (name and address) must be processed in accordance with the Act of Accounting of Act C. 2000. and based on the § 169 of Accounting Law, we are obliged to retain the documents issued in connection with the contract, together with the information contained therein, for 8 years.

In the case of a contract with a company, the data of the contact person and personal data concerning the third Party according to the subject involved are processed in accordance with Article 6 (f) point of paragraph (1) of GDPR, we process the data in our legitimate interest for the smooth execution of the contract and under the limitation period (5 years) for the performance of the contract and the related claims.

### **Using cookies**

Only those cookies that are indispensable for the operation of the system will be installed on your device when you visit the [skitus.com](https://skitus.com) website, which, in the absence of deletion, will be registered for 1 year, to define in which language we should display the page for you upon returning to the website.

What is a cookie? A cookie is a small data package that Internet services store in a browser. A cookie is an indispensable technology to the operation of an online service that provides an efficient and modern user experience and is now supported by all browsers.

How can you control or switch them off?

Cookies can be deleted from the device at any time, and by selecting the appropriate browser settings, you can refuse to use cookies in general. For each browser (Explorer, Mozilla, Chrome, Safari, etc.) and end-user devices (if multiple computers are used), you can delete or disable the cookie separately. For a detailed description of the cookie settings, see the following pages:

Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>

Firefox: <https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalakra-tarolnak-szami>

Chrome:

<https://support.google.com/accounts/answer/61416?hl=hu&co=GENIE.Platform%3DDesktop>

Safari: [https://support.apple.com/kb/ph21411?locale=hu\\_HU](https://support.apple.com/kb/ph21411?locale=hu_HU)

### Other data processing

Our company's website does not log visitor information.

Data processing not listed in this policy (e.g. sweepstake, employee data, etc.) will be communicated when the data are recorded.

### Who have access to your personal data?

Please note that the Court, the public prosecutor, the investigating authority, the infraction authority, the administrative authority, the National Authority for Data Protection and Freedom of Information, or other bodies under the authority of the law, may contact SKITUS to demand information, the disclosure of a document, or request the provision of documents. SKITUS shall provide the authorities, where the authority has designated the precise purpose and the scope of the data, with personal data only to the extent necessary to achieve the purpose of the request.

To carry out certain processing operations related to the processing of data described in this policy, our company use, may use data controllers who act on behalf of the company, and in accordance with its instructions.

Controllers and their responsibilities:

Data controller	Activity related to the data processing by the data controller
Docca OutSource IT Service and Commercial Korlátolt Felelősségű Társaság (Kft.) (registration number: 01-09-685394, seat: 1124 Budapest, Apor Vilmos square 25-26)	Administrator of IT systems (e.g. email correspondence)
Microsoft Corporation (Redmond USA)	Cloud Service (hosting service), mail Service

SKITUS reserves the right to include a further data controller in the future, which you will be informed by the modification of this policy.

### **Are my data safe?**

Yes. In order to preserve the security, confidentiality and privacy of the data we manage, and to prevent the destruction, unauthorized use or alteration of the data, in particular the following information and other data security, organisational measures are applied by SKITUS. In addition, we always monitor the development of technology, as well as the technical, technological and organisational solutions available, we use solutions relevant to the level of protection justified by our data processing.

When storing documents that contain personal data that is kept on paper, we ensure that they are confidential and that they are stored and organized in a locker, in an office building protected by a 0-24-hour reception. Your personal information in email and other electronic means may be accessed only by a particular department with access to it (e.g. HR, sales, office management, by employee in charge of privacy issues).

We use backups to ensure that the data retains its authenticity and integrity, and the original data can be restored in case of possible destruction or alteration. We use password-protected access systems and activity logging.

Microsoft Corporation (Redmond USA) provides the Office 365 cloud-based service for our mail system and our cloud-based storage of digital documents. Microsoft Corporation as a data processing service complies with ISO 27001 Standard, European Union model clauses, HIPAA BAA (Health Insurance Portability and Accountability Act Business Associate Agreement) contract and the demands of the Act FISMA (Federal Information Security Management Act) and is listed in the "Privacy Shield" list, so its service meets the EU's expected data security requirements.

Please note that despite the precautions applied by SKITUS, electronic messages, regardless of protocols (email, Web, FTP, etc.), transmitted online are vulnerable to network threats that may lead to unfair activities, dispute of contract or to the disclosure or alteration of information.

SKITUS as a data controller records the data breaches that have occurred and takes measures to remedy and prevent it in the future. The personal data breach will be reported to the National Data Protection and Information Authority if necessary, and in the event of a high data protection risk, we also notify the relevant parties.

### **What kind of claims of validation do you have? Who to turn to?**

- 1./ Right of information / Right of access
- 2./ Right of data rectification
- 3./ Right to withdraw consent / Right to erasure / „right to be forgotten“
- 4./ Right of objection of processing based on legitimate interest
- 5./ Right to restriction of processing
- 6./ Right to data portability
- 7./ Possibility of complaint

**Right of information / Right of access** The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed. You are entitled to ask for transparent and understandable information on the processing and your rights related to it. This Privacy Policy serves this purpose. At your request, we provide you with the information on you controlled by us, as well as the purposes of the processing, the legal basis, the period, as well as the recipients to whom and why the personal data have been or will be disclosed (in case of disclosure to recipients in a third country, the warranties for the protection of data), in case

the personal data are not collected from the data subject, we inform you on the source, the circumstances of the data processing incident, its effects and the measures for the remedy of it.

At your request, the controller shall provide a copy of the personal data undergoing processing. The first copy is free of charge, for any further copies requested by the data subject, the controller may charge a reasonable fee of which we inform you in advance.

**Right of data rectification** In case you notice that your personal data has been registered erroneously, wrongly, or are incomplete, or if your personal data have changed (e.g., changing your name), we ask you to provide us with the correct, altered or additional information to make corrections and additions, to ensure that the data is up-to-date.

**Right to erasure („right to be forgotten”)** The data subject shall have the right to obtain from the controller the erasure of personal data without justification. Following this, the personal data are erased in the absence of legal basis. Please be informed that the erasure may be denied where processing is necessary, such as for compliance with legal obligation, for the establishment, exercise or defence of legal claims, for exercising the right of freedom of expression and information. In respect of consent-based processing, the withdrawal of consent shall not affect the lawfulness of the processing prior to it.

**Right of objection of processing based on legitimate interest** The data subject shall have the right to object to the processing of data by us, in case you consider the data processing unduly. In case of objection your data shall be erased unless data processing is duly justified by compelling reasons that shall have the priority over your interests, rights and freedom, or are related to legal establishment, exercise or defence of legal claims.

**Right to restriction of processing** The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies: a) the accuracy of the personal data is contested, for a period enabling the controller 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 the use instead; c) SKITUS no longer needs the personal data for the purpose of processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; d) the data subject has objected to processing and time is necessary to verify if there is other reason that may prevent the erasure.

For the period of restriction, the controller shall only store data, other data processing activity is not carried out, apart from processes with the data subject's consent or for the protection of the data subject or a third party, or for public interest. The data subject shall be informed by the controller before the restriction of processing is lifted.

**Right to data portability** In case of consensual or contractual, automated data processing, the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to us, in a structured, commonly used and machine-readable format (e.g.: Word, Excel) and have the right to transmit those data to a third party designated by you.

**Remedy, complaint** In case of suspected impairment of right regarding the processing of your personal data, please first contact us via [adat@skitus.com](mailto:adat@skitus.com) email address. Your complaint is investigated within a month at the latest. You can also bring an action to the competent court where you reside, or of your place of residence or the controller or initiate an inquiry with the National Data Protection and Information Authority (22/C Szilágyi Erzsébet fasor Budapest, 1024, [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), +36-1-3911400, Chairman: dr. Attila Péterfalvi, [www.naih.hu](http://www.naih.hu)).

**Method of claim validation** At [adat@skitus.com](mailto:adat@skitus.com) or by postal mail for the relevant seat, you may indicate your request or complaint. In the letter, please provide your mailing address in case of request for identification and postal response. If we have doubts about your identity or if the information provided is insufficient, we are entitled to request additional credentials.

We will investigate and respond to your request in writing (by email) within 1 month. We are entitled, if necessary, to extend this deadline by a further 2 months, about which we will send you a reasoned information.

25th May 2018