

**Dear Applicant,**

**Thank you for your interest in the MET Group!**

**Please read our recruitment data protection notice which aims to ensure that your personal data will be processed in accordance with the provisions of the General Data Protection Regulation<sup>1</sup> and the respective national data protection laws.**

Please be informed the legal basis of data processing is your voluntary consent and, in certain cases, the legitimate interest of MET company group. By submitting your job application via our career website to the MET company group, your consent to the processing your personal data shall be considered as granted. If you submit your application outside the MET company group's career website in another manner (in particular personally or via email) your consent to the processing your personal data shall also be considered as granted. The consent covers the processing of personal data that you provide to the Data Controller during the selection procedure.

**With regards to our recruitment data processing notice below, we expressly inform you that you have the right to object to the processing of your personal data and that you can withdraw your consent at any time. (see Section 1.6.).**

We inform you that with regards to your job application our company as Data Controller processes your personal data provided in the course of your registration and application or generated as a result of the application procedure (***personal identification data, contact details, professional CV data, letter of motivation and personal data generated as the result of individual testing procedures***). If you do not apply directly to us (that is, for example through a recruitment agency, employment agency or a student labour association; hereinafter: "External company"), we inform you that some of your personal data might be collected both from you and from other sources (e.g. from the External company). Data processing carried out by External company is governed by the privacy policy of External company and is not under the control or responsibility of the MET company group. We may also collect information that are publicly available to everyone on the internet (including information on business entities and company relations, or social networking sites such as LinkedIn or Facebook) or on other public sources that may be relevant to the job application or the position to be filled.

Please only provide your own, actual personal data in the course of the selection procedure. Please do not provide special categories of personal data (***that is, data concerning racial or ethnic origin, political views, religious or philosophical beliefs, or trade union membership, genetic data, data concerning health or data concerning your sex life or sexual orientation***) in your application materials to be uploaded.

By submitting your job application and the personal data therein you warrant that such information concerns exclusively your personal data or you have proper legal basis for providing the personal data. If the Data Controller became aware that there was no proper legal basis to process your personal data, it will delete all respective personal data immediately. The Data Controller shall not be responsible for the violation of your above commitment or any damages, losses arising therefrom.

We will automatically delete your personal data no later than 90 days after the closure of the application procedure, except, if as a result of the evaluation, we establish employment relationship with you or, in case of refusal your job application, you give your explicit consent to us to process your personal data for an additional 12 months so that we can inform you on other open positions at MET Group. In this case, your personal data may be transferred to other respective MET companies (please see the current list of the MET Group in Annex 1). In case of establishing employment or other legal relationship, we will process your personal data for other purposes and possibly on different legal bases, about which, if applicable, we shall provide you a separate privacy notice that will contain the details of our data processing during the respective legal relationship.

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council

## RECRUITMENT DATA PROTECTION NOTICE OF MET GROUP

### 1.1 Data Controllers and their contact options

MET Holding AG, MET Services Kft. and the MET company which is recruiting for the given position are considered as joint data controllers for the recruiting process. An agreement on joint controllership exists between the members of the MET group. However, personal data will be collected and processed primarily by the company to which the Applicant has applied, therefore, this MET company will be primarily responsible for the legality of data processing and is appointed to receive requests from data subjects. This notice applies to all companies in the MET group, therefore the Applicant will not receive separate privacy notices from each of the given MET entities.

The main data controller is the MET company that advertises the open position. Members of the MET group are listed on the following link: <https://group.met.com/en/about-us/met-group-facts>

Company name of the joint data controller: MET Holding AG  
Registered office: Neuhofstrasse 24, 6340 Baar, Switzerland

Company name of the joint data controller: MET Services Kft.  
Registered office: 1117 Budapest, Dombóvári út 26.

E-mail address: [dataprotection@met.com](mailto:dataprotection@met.com)  
Telephone number: +41 41 766 89 89

Website: [www.met.com](http://www.met.com)

### The contact details of Data Protection Officer (hereinafter the: "DPO") in relation to certain Hungarian companies

E-mail address: [MET-DPO@simonlegal.hu](mailto:MET-DPO@simonlegal.hu)

*The DPO is registered in relation to specific Hungarian MET entities. For other companies, the DPO acts as a common point of contact for enquiries about data protection issues.*

### 1.2 Scope of processed data, purpose, legal basis of data processing, the period for which the personal data is stored<sup>2</sup>

	Categories of personal data concerned	Purpose of data processing	Legal basis of data processing	Period for which the personal data is stored	Persons authorized to access the data
a)	Personal and contact data of the Applicant provided in the course of the registration process	Identification, keeping contact	Data processing is necessary in order to take steps at the request of the data subject prior to entering into a contract // Consent of the applicant	Until the Applicant withdraws his/her consent but no later than 90 days after the closure of the selection procedure; after the closure of selection procedure for an additional period of 12 months if the applicant voluntarily and expressly consented to the processing of his or her personal data for recruitment purposes.	The competent person(s) within the relevant MET company for the area related to the position and the competent employees of HR department, Security, Legal & Compliance

	<b>Categories of personal data concerned</b>	<b>Purpose of data processing</b>	<b>Legal basis of data processing</b>	<b>Period for which the personal data is stored</b>	<b>Persons authorized to access the data</b>
				In the case that the Applicant cancels his/her application before the closure of selection procedure the Data Controller shall immediately delete the respective personal data.	
b)	Data concerning proficiency, qualification, professional experience	Certifying the qualification necessary to fulfill the position in question	Data processing is necessary in order to take steps at the request of the data subject prior to entering into a contract // Consent of the applicant	Until the Applicant withdraws his/her consent but no later than 90 days after the closure of the selection procedure; after the closure of selection procedure for an additional period of 12 months if the applicant voluntarily and expressly consented to the processing of his or her personal data for recruitment purposes.	The competent person(s) within the relevant MET company for the area related to the position and the competent employees of HR department, Security, Legal & Compliance
c)	Professional CV, letter of motivation	Assessing the proficiency, qualification, professional experience necessary to fulfill the position in question and evaluating the motivation of the Applicant	Data processing is necessary in order to take steps at the request of the data subject prior to entering into a contract // Consent of the Applicant	Until the Applicant withdraws his/her consent but no later than 90 days after the closure of the selection procedure; after the closure of selection procedure for an additional period of 12 months if the Applicant voluntarily and expressly consented to the processing of his or her personal data for recruitment purposes.	The competent person(s) within the relevant MET company for the area related to the position and the competent employees of HR department, Security, Legal & Compliance
d)	Data generated by the Data Controller about the applicant in the course of the interviews concerning the evaluation of the applicants	Evaluation of the suitability of the Applicant in the selection procedure	Data processing is necessary in order to take steps at the request of the data subject prior to entering into a contract // Consent of the Applicant	Until the Applicant withdraws his/her consent but no later than 90 days after the closure of the selection procedure; after the closure of selection procedure for an additional period of 12 months if the applicant voluntarily and expressly consented to the processing of his or her personal data for recruitment purposes.	The competent person(s) within the relevant MET company for the area related to the position and the competent employees of HR department, Security, Legal & Compliance
e)	Personal data generated in the course of the aptitude tests, Assessment Centre and other tasks testing skills necessary to fulfill the position before admission (numerical, verbal and logical test and accuracy test, depending on the nature of the position to be	Determining suitability for the position	<b>The legitimate interest of the Data Controller in selecting the most suitable Applicant in order to ensure its safe, operational and prudent operation.</b>	Until the Applicant exercises his/her right to object but no later than 90 days after the closure of the selection procedure; after the closure of selection procedure for an additional period of 12 months if the Applicant voluntarily and expressly consented to the	The competent person(s) within the relevant MET company for the area related to the position and the competent employees of HR department

	<b>Categories of personal data concerned</b>	<b>Purpose of data processing</b>	<b>Legal basis of data processing</b>	<b>Period for which the personal data is stored</b>	<b>Persons authorized to access the data</b>
	applied for) or as the result of it, with reference to the attitude, skills of the Applicant (but do not contain special category of personal data).			processing of his or her personal data for recruitment purposes.	
f)	Information publicly available to everyone on the internet (including information on business entities and company relations, or social networking sites such as LinkedIn or Facebook) or other public sources that may be relevant to the job application or the position to be filled.	Determining suitability for the position, obtaining information on potential conflict of interest	<b>The legitimate interest of the Data Controller in selecting the most suitable Applicant in order to ensure its safe, operational and prudent operation.</b>	Until the Applicant exercises his/her right to object but no later than 90 days after the closure of the selection procedure; after the closure of selection procedure for an additional period of 12 months if the Applicant voluntarily and expressly consented to the processing of his or her personal data for recruitment purposes.	The competent person(s) within the relevant MET company for the area related to the position, the competent employees of HR department, Security, Legal & Compliance

The provision of the above data are voluntarily, but we emphasize that in case **the Applicant does not provide the above data in full**, he or she may be excluded from the selection procedure. As the data processing is necessary in the recruitment process, providing certain data may be a precondition to entering into an employment agreement with the Data Controller.

Providing the following data are preconditions of applying to a position via our career website: name, e-mail, phone number, area of position, location, experience, language skill. Acknowledgement of this fair processing notice is also a precondition of your application.

### 1.3 Recipients or categories of recipients of the personal data

The Data Controller transmits the personal data submitted or generated in the course of the application procedure to the following members of the MET group operating in Switzerland in accordance with Article 45 of the GDPR, based on the adequacy decision of the European Commission 2000/518/EC.

The adequacy decision is available under the following link:

<https://publications.europa.eu/en/publication-detail/-/publication/ee76f93d-4545-4878-87cb-7750d7f59987/language-hu>.

<b>Name of the recipient</b>	<b>Recipient category</b>	<b>Activity concerned by the involvement of the recipient</b>
<b>MET Holding AG</b>	Joint data controller	The recipient is entitled to get to know and process the data of the Applicant in the course of the evaluation of the application and is further entitled to conduct personal interviews with the applicant.
<b>MET group company or its subsidiary specified in the job advertisement as the company offering the open position to the applicant</b> (in case the Applicant consented to the additional processing of his/her personal data after the closure of selection procedure, or the applicant provided his/her data to a MET group company other than offering the open	Joint data controller	The data processing carried out by the recipient includes taking part in the evaluation of the applicant and conducting personal interviews with the Applicant.

position in which the applicant is interested)		
<b>MET Services Kft.</b>	Joint data controller	MET Services Kft. performs certain group-wide service functions, such as Legal & Compliance, Security and IT.

In other cases, except for data transfer from our subcontractors to authorized subcontractors (see below), the Controller does not transfer personal data to recipients outside the EU or the EEA.

The Controller assigned the task of testing of certain professional skills of the Applicants to the following partner:

Name of the recipient	Recipient category	Activity concerned by the involvement of the recipient
<b>KORN/FERRY International Budapest Személyi Tanácsadói Szolgáltató Kft.</b> (1022 Budapest, Bimbó út 77.)	Data Processor	MET uses this company's online tests during the selection process to assess the candidate's suitability for the chosen position. The tests assess logical, verbal and numerical skills. An online interface is entered by the applicants, MET receives the percentile results for the 3 modules and the applicants also receive a short text assessment. The system automatically generates the evaluation.
<b>Subcontractors of KORN/FERRY International Budapest Személyi Tanácsadói Szolgáltató Kft.</b> <a href="https://cdn.kornferry.com/privacy/subprocessor.pdf">https://cdn.kornferry.com/privacy/subprocessor.pdf</a>	Subprocessors	The recipients provide the data processor certain sub-processing services as listed under the link.

The Data Controller may apply the pre-admission aptitude test and other tasks testing the skills necessary to fulfill the position in the course of every recruitment procedure, depending on the tasks of the position.

In the course of the testing procedure, the Data Controller provides the online test and sends the registration data necessary to access the test to the e-mail address provided by the Applicant. The Applicant is entitled to complete the test and to perform the tested tasks until the date agreed on with the Data Controller. The Applicant will also receive the results of the aptitude test.

MET Group uses a talent acquisition software provided by a German company called SmartRecruiters GmbH, where applicants can directly submit and manage their applications, they can also apply via LinkedIn, Indeed and SmartProfile, subscribe to job alerts and track their application status. Through this tool, the Data Controller can, among others, use social distribution tools, manage applications by using several functions like import, export and read candidate data, follow status, schedule, and manage interviews, use assessment and screening tools, use job specific scorecards, manage CVs and other attachments. Candidates and the Data Controller can also communicate via a message portal, sms or WhatsApp messages by using the platform.

Name of the recipient	Recipient category	Activity concerned by the involvement of the recipient
<b>SmartRecruiters GmbH,</b> <b>Wilhelmstraße 118, 10963 Berlin, Deutschland</b> <b>Comp. reg. No: HRB 153616 B</b>	Data processor	The recipient provides Data Controller and MET Group an access to an applicant acquisition software platform.
<b>Subcontractors of SmartRecruiters GmbH:</b> <a href="https://www.smartrecruiters.com/legal/subprocessors/">https://www.smartrecruiters.com/legal/subprocessors/</a>	Subprocessors	The recipients provide the data processor certain sub-processing services as listed under the link.

When SmartRecruiters or its sub-processors processes a personal data in countries outside the EEA or Switzerland, SmartRecruiters is contractually bound to undertake (and shall ensure that its sub-processors undertake) an international transfer only if the requirements according to Art. 44 GDPR are met.

#### 1.4 Processing of special categories of personal data

The Data Controller does not process any special category of personal data in the course of the selection (recruitment) process.

#### 1.5. Data of the data subject obtained from other sources

Personal data, conclusions referring to the work-related attitude, skills, personality traits of the Applicant and generated as the result of the testing procedure are received by the Data Controller from Access Assessment Kft. Access Assessment Kft. are only allowed to transfer such data to the Data Controller that might be relevant for the evaluation of the application and that provides adequate information with respect to the applied position.

If the applicant does not directly apply for a position at the Data Controller (that is, for example through a recruitment agency or through a temporary employment agency or a student labour association) then the Data Controller may collect certain data from these sources as well. Recruitment agencies are considered as independent data controllers.

Category of the data source:	Categories of the personal data concerned
recruitment agency	scope of data according to Section 1.2, Subsections a) to d)
student labour association or temporary work agency	scope of data according to Section 1.2, Subsections a) to d)
Publicly available websites such as websites on business entities and company relations, social networking sites such as LinkedIn or Facebook	scope of data according to Section 1.2, Subsection f)

#### 1.6. Rights of data subjects

The Applicant may request from the Data Controller access to personal data concerning the Applicant, rectification of inaccurate personal data, erasure of personal data, in certain cases the restriction of processing, furthermore the Applicant also has the right to object to the processing of personal data. Additionally, the applicant is entitled to the right to the portability of data, to lodge a complaint with a supervisory authority and to an effective judicial remedy; additionally, in the case of automated individual decision-making (including profiling) the right to obtain human intervention on the part of the Controller and to express his/her point of view and to contest the decision. **In the case of data processing based on consent the applicant is also entitled to withdraw his/her consent at any time, which, however, does not affect the lawfulness of data processing performed based on consent before the withdrawal.**

- **Right to access**

The applicant is entitled to request information at any time about whether and how the Data Controller processes their personal data, including the purposes of data processing, the recipients to whom the data was disclosed or the source where the Data Controller received the data from, the envisaged period for which the personal data will be stored, any right of the Applicant concerning data processing, information concerning automated decision making, profiling, and information concerning related guarantees in the case of forwarding to third countries or to any international organization. When exercising the right to access the applicant is also entitled to request copies of the personal data undergoing processing; in the case of a request submitted electronically the Data Controller – in lieu of a request from the applicant that says otherwise – provides the requested information electronically (in pdf format). If the right to access of the Applicant has a detrimental effect on the rights and liberties, in this regard especially the business secrets or intellectual property of others, the Data Controller is entitled to refuse to comply with the request to the necessary and proportionate extent. If the applicant requests the above information in several copies, the Data Controller charges a reasonable amount of fee, proportionate to the administrative costs of preparing the additional copies, HUF 200 per copy/page.

- **Right to rectification**

At the request of the Applicant the Data Controller corrects or completes personal data concerning the applicant. If any doubts arise concerning the corrected data, the Data Controller may request from the

applicant the certification of the corrected data for the Data Controller appropriately, primarily with documents. If the Data Controller disclosed the personal data of the applicant with this right to another person (e.g. the addressee as data processor), then the Data Controller shall immediately inform such persons after correcting the data, provided it is not impossible or it does not require a disproportionate amount of effort from the Data Controller. At the request of the applicant the Data Controller informs them about such addressees.

- ***Right to erasure ('right to be forgotten')***

- If the applicant requests the erasure of any or all personal data of theirs, the Data Controller shall erase such data without undue delay if:
  - the Data Controller does not need the personal data in question any more for the purpose such data was collected or otherwise processed for;
  - it concerns data processing that was based on the consent of the Applicant, but the applicant withdrew the consent and the data processing has no other legal basis;
  - it concerns data processing that was based on the legitimate interests of the Data Controller or third parties, but the applicant objected to the data processing and – with the exception of objection to data processing for direct marketing purposes – there are no legitimate grounds for the data processing that would have priority;
  - the Data Controller illegally processed the personal data, or
  - the deletion of personal data is necessary for the performance of legal obligations.
- If the personal data under this right is disclosed by the Data Controller to another party (e.g. the recipient as for example data processor) then the Data Controller shall immediately inform such persons after the deletion, provided it is not impossible or it does not require a disproportionate amount of effort from the Data Controller. At the request of the applicant the Data Controller informs them about such recipients. The Data Controller is not always obliged to delete personal data, especially for example in the case of the data processing is necessary for the establishment, exercise or defense of legal claims.

- ***Right to restriction of processing***

The Applicant can request the restriction of the processing of their personal data in the following cases:

- the Applicant contests the accuracy of the personal data – in this case the restriction concerns the period enabling the data controller to check the accuracy of personal data;
- the data processing is unlawful, but the applicant opposes the erasure of data, requesting the restriction of the usage of the same instead;
- the Data Controller does not need the personal data for data processing purposes any longer, but the applicant needs the data for the establishment, exercise or defense of legal claims; or
- the applicant objected to the data processing – in this case the restriction concerns the period until it is established whether the legitimate grounds of the Data Controller override those of the Applicant.

The restriction of data processing means that the Data Controller does not process the personal data belonging under the scope of the restriction except for storage, or only processing such data to the extent the applicant consented to, and the Data Controller may process data necessary for the establishment, exercise or defense of legal claims or for the protection of the rights of other natural persons or legal entities or considering the important public interests of the European Union or any European Union member state even in lieu of such a consent. The Data Controller informs the applicant beforehand about releasing the limitation of the data processing. If personal data under this right is disclosed to other persons (e.g. the addressee as for example data processor), the Data Controller shall immediately inform such persons about the restriction of data processing, provided it is not impossible or it does not require a disproportionate

amount of effort from the Data Controller. At the request of the applicant the Data Controller informs them about such recipients.

- ***Right to objection***

If the legal basis for the data processing concerning the applicant is the legitimate interest of the Data Controller or third parties, the applicant is entitled to object to the data processing. The Data Controller is not obliged to uphold the objection if the Data Controller can prove that

- the data processing is justified by legitimate and compelling causes that take precedence over the interests, rights and liberties of the applicant, or
- the data processing is connected to the data for the submission, enforcement or defense of legal claims of the Data Controller.

- ***Right to data portability***

The Applicant is entitled to request that the Data Controller hands over the personal data of the Applicant provided to the Data Controller on the basis of consent or a contract, and processed by the Data Controller by automated means (e.g. by a computer system), to the applicant in a structured, commonly used and machine-readable format even for the purposes of transmitting such personal data to other data controllers or if it is technically feasible, the Data Controller, at the request of the Applicant, transmits such personal data directly to another Data Controller as indicated by the Applicant. In the case of such requests the Data Controller provides the requested data in an agreed format. If the applicant's exercise of the right to data portability had adversely affected the rights and freedoms of others, the Data Controller is entitled to refuse to comply with the request of the applicant to the necessary extent. Measures taken in the scope of the data portability does not mean the deletion of the data, only if, at the same time, the Applicant submits a request to delete the personal data in addition. Therefore, in lieu of such a request, the Data Controller stores such personal data as long as it has the purpose and the appropriate legal basis for the processing of those data.

- ***Right to lodge a complaint, right to an effective judicial remedy***

If the Applicant considers that the processing of their personal data by the Data Controller infringes the provisions of the established data protection legal regulations, especially the General Data Protection Regulation, the applicant has the right to lodge a complaint with the competent data protection supervisory authority in the Member State of his/her habitual residence, place of work or the place of the alleged infringement.

You can find a list of the national data protection authorities in the EU [here](#).

The applicant, regardless of his/her right to lodge a complaint, may also bring proceedings before a court for such infringement. The Applicant is entitled to bring proceedings against the legally binding decision of the supervisory authority concerning the applicant as well. The applicant is also entitled to effective judicial remedy if the supervisory authority does not handle the complaint or does not inform the Applicant within three months on the progress or outcome of the complaint lodged.

#### **1.7. Automated individual decision-making, including profiling**

No automated individual decision-making or profiling is performed in the course of the data processing of the Data Controller concerning the applicants.

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**Effective date: 25 May 2018**

**Revised: 26 August 2019**

**Revised: 01 November 2021**

**Revised on: 31 August 2023**

**Revised on: 01 June 2024**