

## DENTONS RECRUITMENT PRIVACY NOTICE

### INFORMATION ABOUT OUR PROCESSING OF CANDIDATE PERSONAL DATA

Dentons Budapest

#### 1. Introduction

Dentons is committed to protecting the privacy and security of your ("you" or "Candidate") personal data. As your prospective employer, we need to collect personal data about you and we are a "controller" of it under data protection law.

This notice is to help you understand what personal data we collect about you in the course of recruitment, why we collect it and what we do with it. By "you", "your" or "Candidate" we mean you the candidate or job applicant.

#### 2. Details of the Controller

Dentons Réciczka Law Firm with its registered address at 1061 Budapest, Andrásy út 11, Hungary ("we", "us", "Dentons" or "Dentons Office", "our" are referenced to Dentons) is the data controller of your personal data for the purposes described in this Recruitment Privacy Notice..

Dentons Réciczka Law Firm is a member of Dentons <Europe LLP/ UK&ME LLP>, a party to the Swiss Verein, the other members of which are Dentons Australia Pty Ltd, Dentons Canada LLP, Dentons Cárdenas & Cárdenas Abogados Ltda., Dentons Hong Kong, Dentons López Velarde, S.C., Dentons Muñoz CAC, Inc., Dentons Rodyk & Davidson LLP, Dentons Europe, Dentons UKME LLP, Dentons US LLP, and 北京大成律师事务所 (China) ("Dentons Group"). Those members and their respective subsidiaries and affiliates provide legal services in different locations, each of which is its own legal practice. For a list of each location, see [www.dentons.com](http://www.dentons.com)

If you have any questions about Dentons' use of your personal data, please contact the Recruitment Team at [Recruitment.Budapest@dentons.com](mailto:Recruitment.Budapest@dentons.com)

### WHAT PERSONAL DATA WE COLLECT AND WHAT WE USE IT FOR

#### 3. What personal data we collect about you

We collect, store and use the information below about you during the recruitment process. If you fail to provide certain information when requested we may not be able to progress your application.

- **Information we require according to local labour law when recruiting for job position**, including : Name(s) and surname, name of parents, date of birth, place of residence, correspondence address, education, course of previous employment, medical certificate stating that there are no contraindications to work in a given position.
- **Information we receive from you when applying/recruiting for a worker position, including:** Name(s) and surname, date of birth, gender, place of residence, correspondence address, citizenship, education, information on previous employment;
- **Information provided in your curriculum vitae, application form, covering letter and during the interview process including:** your name, date of birth, age, gender, home address, personal email address, education, qualification and work experience details, and references, training and **diplomas**,

knowledge of foreign languages, data on the possession of driving licenses and driving licenses, data contained in employment certificates, data collected during the interview, financial expectations;

- **Information collected by us in the course of searches to identify professional opportunities that we may think are of interest to candidates or to identify suitable candidates**
- **Information collected or created by us during the recruitment process including:** interview notes, test scores and correspondence between us.

#### **4. How we collect your personal data**

This information is either:

- provided directly by you when you apply for a role with us, during your interactions with us ( e.g. interviews, and other exchanges) assessments;
- obtained from third parties such as recruitment agencies, job placement services or headhunters, your referees and an internal Dentons contact when you are being recommended for consideration for a role;
- obtained from publicly available sources, such as the internet (e.g. we may collect information that you have made available on professional networking sites such as LinkedIn);
- created by us in the course of the recruitment process.

#### **5. How we use personal data**

We will use your personal data (including special categories of personal data) where permitted by law, we will process your personal data in accordance with the following legal bases,

- to progress the recruitment process, assess and make a decision about your suitability for a role, and to communicate with you;
- to carry out reference checks, pre-employment checks and background screening where relevant, and to undertake any steps that we need to take prior to engagement;
- to comply with legal and regulatory requirements;
- where you have provided your consent to use your data, where relevant;
- where it is necessary for the establishment, exercise or defence of legal claims;
- where it is needed for reasons of substantial public interest, provided that it is based on the applicable law regulations, such as for equal opportunities monitoring;
- where you have already made the relevant personal data public;
- it is necessary for our legitimate interests (or those of a third party) provided that our or a third party's legitimate interests are not overridden by your interests or fundamental rights which require protection of your data;

- exceptionally, if it is necessary for vital interests relating to you or another person (for example, avoiding serious risk of harm to you or others) and where you are not capable of giving consent (when consent is required).

## **6. Why we use personal data**

We will use your personal data, as it is our legitimate interest as a recruiter to fully understand, identify and assess the suitability for potential candidates or applicant's for a role and verify the information provided to us. We are also under a legal obligation to perform checks around your legal right to work. This means we will:

- Review and assess any information you provide in your job application to establish whether to progress it, contact you to arrange interviews and assessments, to evaluate your performance and provide feedback, and where successful to make you an offer and provide you with your contract of employment/engagement or other similar contract.
- Where relevant, to carry out pre-employment checks and background screening (including criminal record and credit checks, fraud checks, adverse media checks, court judgements, sanctions checks and other regulatory screening (to the extent we are allowed to perform such checks under applicable laws)), to check your legal right to work, to verify the information in your CV and the references that have been provided to us. It is necessary for us to do so before entering into a contract with you;
- Perform search activities to identify opportunities, solicit names of potential candidates for specific (or potential) roles we are (or may be) recruiting for and contact such candidates.
- Perform market research activities in relation to recruitment.

## **7. Why we use special categories of personal data**

During the recruitment process we may come across and capture special categories of personal information about you especially if you provide such information to us via your CV or during our meetings. We may also need to process special categories of personal information about you (eps. information about your physical or mental health) to ensure that we comply with our legal and regulatory obligations and in order to make any reasonable and necessary adjustments to enable you to participate in the recruitment process e.g. apply for a job, attend an interview or take an assessment. If you are successful we will process special categories of personal information during onboarding and thereafter to ensure all necessary arrangements are made for when you join us. We may also process information relating to criminal convictions and offences as described in the next section.

## **8. Automated decision making**

We do not envisage that any decisions will be taken about you using automated means. In order to understand whether we make an automated decision related to you and how to object to such data processing, please refer to our HR contact.

## **SHARING YOUR PERSONAL DATA**

### **9. Who we share your personal data with, why and how**

During the recruitment process, we will need to share your personal information internally and with certain third parties. Any information that we share either internally or externally is only limited to what is required by each party or individual to perform their role in the recruitment process and could involve the following:  
Internally:

- Recruiting and other relevant managers;
- Individuals within the HR department who are involved in certain aspects of the HR processes;
- IT and relevant areas to ensure access to relevant systems
- Compliance and Risk, as relevant
- Security, reception and facilities

Externally:

- recruitment agencies and candidate interview and assessment service providers  
pre-employment screening and background check providers (if applicable) (e.g. credit checking agencies, criminal checking providers etc.);
- academic institutions, professional bodies, regulators and competent authorities to the extent required by the applicable laws;
- Companies or individuals you worked for in the past for validation and/or reference purposes;
- other third party suppliers who provide services on our behalf.

### **10. Where your personal data is held or transferred to**

We are a member of the Dentons Group and your personal data may be transferred to countries where companies, organisations and individuals inside and outside of the Dentons Group that we share data with are located. Data protection laws vary by country and those applicable in the EU and elsewhere are not equivalent to those applicable in certain other jurisdictions. Dentons will take steps to protect your personal data in line with the applicable data protection requirements. Some of the mechanisms we use include the adoption of Standard Contractual Clauses (SCCs) approved by the European Commission.

For obtaining a copy of the appropriate safeguards, please contact our Recruitment Team.

## **PROTECTING YOUR PERSONAL DATA AND HOW LONG WE KEEP IT FOR**

### **11. How we protect your personal data**

We follow strict security procedures as to how your personal data is stored and used, and who sees it, in order to stop any unauthorised person accessing it. Our Security Policies set out the standards we follow to keep

your information secure. When information is kept by other parties providing a service to us, they are expected to adhere to standards set by Dentons and by the relevant law. For further information, please request a copy of our internal security policies from your HR department of the EME Data Privacy Team.

## 12. How long we keep hold of your data

We will only retain your personal data for as long as permitted by applicable law or necessary to fulfil the purposes we collected it for.

We will retain your personal information for the duration of the recruitment process in connection to the position you applied for and we may retain and use your personal information to consider you for other positions if you have consented to this. We will also hold some personal information about you as required for legal or regulatory purposes and for the length of any applicable limitation period for claims which might be brought against us later. If you are successful in applying for a position, your personal information will be retained for the purposes of your contract with us, as set out within our Workers Privacy Notice and in accordance with our data retention policy.

Dentons will use its reasonable endeavours to remove your records from its systems 6 to 12 months following the last documented Candidate activity.

Where appropriate we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will use secure methods to delete or destroy your personal data.

## YOUR RIGHTS UNDER DATA PROTECTION AND HOW TO EXERCISE THEM

### 13. Your rights

You have a number of rights in relation to our handling of your data. These include the following:

- **Access:** you are entitled to ask us if we are processing your information and, if we are, you can request access to your personal data (commonly known as a "**data subject access request**" or **DSAR** in short). This enables you to receive information regarding the personal data we hold about you and to check that we are lawfully processing it.
- **Correction:** you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected.
- **Erasure:** you are entitled to ask us to delete or remove personal data in certain circumstances (e.g., if you withdrew your consent to process your personal data for specified therein purposes). There are also certain occasions where we may refuse a request for erasure, for example, where the personal data is required for compliance with laws and regulations, with our obligations under our contract and for other legal reasons such as in connection with claims.
- **Restriction:** you are entitled to ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Transfer:** you may request the transfer of certain of your personal data to another party.

- **Objection:** where we are processing your personal data based on a legitimate interest (or those of a third party) you may object to processing on this ground. However we may be entitled to continue processing your information based on our legitimate interests.
- **Automated decisions:** you may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.
- **Right to withdraw consent:** in the limited circumstances where you may have provided your consent to the collection and processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. The withdrawal only applies to any future processing not what we have done in the past. To withdraw your consent, please contact the Recruitment Team.
- **Right to lodge a complaint:** You also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident, where you work or where an alleged infringement of Data Protection law has taken place.
- **Direct Marketing:** we will not use personal information collected about you for the purposes of recruitment to offer you any products or services or provide your personal information to others in order to market their products or services to you.

We may also need to retain some information if you submit one of these requests, in order to fulfil it.

If you do not give us your personal data that we require or give us inaccurate data, we may not be able to consider you for a role.

#### **14. How to exercise your rights**

If you want to exercise any of these rights, please contact our Recruitment Team.

#### **HOW TO CONTACT US AND FURTHER DETAILS**

##### **15. Contact details - questions or complaints**

If you would like to receive additional information about this Notice, have any questions around how we handle your personal data or would like to make any complaints, please contact our Recruitment Team (Tel.: +36 1 488 5200).

You can also contact our Global Data Protection Officer and the Data Privacy Team at [risk.dataprivacyteam.emea@dentons.com](mailto:risk.dataprivacyteam.emea@dentons.com).

##### **16. Changes to this notice**

This notice may be changed from time to time. The current version of this Privacy Notice will be posted on [www.dentons.com](http://www.dentons.com)