

# Privacy Notice

*Last updated: March 07, 2025*

This document ('Notice') is the privacy notice of VIOLET Consulting Ltd. (registered address: 1097 Budapest, Vaskapu Street 10-14, Ground Floor 010/C, company registration number: 01-09-376398, tax number: 14822250-2-43) ('VIOLET Consulting'). VIOLET Consulting places great emphasis on handling all personal data disclosed to it with utmost care and diligence, in full compliance with applicable data protection laws and regulations, in line with the objectives and expectations set out in this Notice. One of the key elements of our data management philosophy is to use as little personal data as possible while providing our services, thereby contributing to data minimization and data security requirements. The purpose of this Privacy Notice is to provide you with comprehensive information regarding the data processing activities conducted by VIOLET Consulting as a data controller under the General Data Protection Regulation ('GDPR'), as well as our data management practices, with particular attention to the rights you have concerning our data processing activities.

In addition to this written notice, you can also request verbal information regarding data processing from our company.

## **1. The Scope of Data Processed and Purposes of Data Processing**

### Cookies and Collection of Non-Personal Data

You can use our website without disclosing personal information and have free access to its content. We inform you that our website uses cookies to ensure its proper functionality. Cookies are small text files stored on your device that help improve user experience and site performance.

We only use strictly necessary cookies, which are essential for the website to function properly. These cookies cannot be disabled, as they ensure security, authentication, and basic functionalities.

In this case, VIOLET Consulting collects only metadata that is not considered personal data under the GDPR. This information does not enable user identification; therefore, GDPR regulations related to personal data processing do not apply.

We reserve the right to update this cookie policy as necessary. Any changes will be reflected on this page.

### Processing of Personal Data

After receiving this Notice, you may provide your voluntary and explicit consent by confirming in writing via electronic means or by completing and signing the Data Processing Declaration, thereby giving your clear and unambiguous consent. By doing so, you agree that VIOLET Consulting may process the personal data you provide (name, contact details, previous workplaces, education, salary expectations, language proficiency) for the period specified in Section 6 of this Notice (personal consent). These data will be used solely for the purpose of contacting and maintaining communication (purpose of data processing).

We would like to inform you that you may withdraw your consent for data processing specified in this section at any time in the future, without obligation to provide a reason, by following the procedure

outlined in Section 5.

By giving your explicit consent through written confirmation sent electronically (e.g., when applying for a position via our website, through an online platform, or during a phone interview) or by completing and signing the Data Processing Declaration (in the case of an in-person interview), you declare that you have read and understood the terms of this Notice and expressly accept them.

#### Data Processing in the Case of an Interview Conducted via Online Platform or Telephone

Upon receiving your application materials (resume, cover letter), we may initiate an interview through an online platform or by phone (either a preliminary screening interview or a job interview). This interview serves to assess your suitability for the advertised position. Important information conveyed during the interview will be recorded by our staff in paper notes and, together with your application materials ('Complete Application Package'), will be sent electronically to VIOLET Consulting's clients. The Complete Application Package will be retained for contact and follow-up purposes related to job opportunities as outlined in Section 6. The legal basis for processing personal data provided during the screening or job interview is your consent.

#### Data Processing in Case of Contact via Our Website

VIOLET Consulting allows you to contact us via our website regarding the services we provide. To send a message, you need only provide your name and email address; however, we will also accept your inquiry if you choose not to provide your full or real name. In this regard, we emphasize that you are solely responsible for the accuracy and truthfulness of the information provided.

VIOLET Consulting also allows you to submit a job application via our website for the position of your choice. In addition to your name and email address, you must provide an up-to-date resume in Hungarian or English for your application to be valid, and for us to initiate contact with you. You are solely responsible for the accuracy and truthfulness of all data provided during the job application process, including the information contained in your resume.

After receiving this Notice and giving your voluntary and explicit consent by selecting the appropriate checkbox on the website that states, 'I declare that I have expressly accepted Violet Consulting's Data Processing Notice ('Notice') after reading and understanding it.', thereby providing your clear and unambiguous consent, you agree that VIOLET Consulting may process your personal data for the period specified in Section 6 of this Notice (personal consent). This data will be processed solely for the purpose of contact and follow-up regarding job applications (purpose of data processing). We would like to remind you that you may withdraw your consent to data processing specified in this section at any time in the future, without obligation to provide a reason, following the procedure outlined in Section 5.

In the case of a job application or a service-related inquiry, by selecting the appropriate checkbox to give explicit consent, you declare that you have read, understood, and expressly accepted the terms of this Notice.

#### Data Processing in Case of In-Person Contact

After receiving your application materials (resume, cover letter), we may initiate an in-person meeting (job interview) to assess your suitability for the advertised position. Important information conveyed

during the interview will be recorded by our staff in paper notes and, along with the received application materials ('Complete Application Package'), will be sent electronically to VIOLET Consulting's clients. The Complete Application Package will be retained for contact and follow-up purposes related to potential job offers, in accordance with the terms specified in Section 6. The legal basis for processing personal data provided during the job interview is your consent.

#### Data Processing Related to Application Materials Submitted to VIOLET Consulting

Please be informed that, except in cases of direct inquiry, we receive your application materials ('Application Materials'), including any personal data they contain, from job advertising service providers with whom we collaborate. These companies, like us, are considered data controllers under GDPR for the handling of your personal data, as you have granted your consent for them to process your personal data.

VIOLET Consulting takes every measure to ensure that the personal data in the application materials submitted to us is processed in accordance with applicable data protection laws and with respect to GDPR's data processing principles, minimizing any risk of unauthorized disclosure to third parties. These personal data are retained solely for the purpose of presenting potential job opportunities, as specified in Section 6, and the legal basis for processing them is your consent.

#### Consent of Minors

Our company does not offer services related to the employment of minors and, therefore, does not process personal data of minors.

### **2. Changes to the Privacy Notice**

To ensure the Privacy Notice remains up-to-date and complies with changes in data protection regulations, VIOLET Consulting reserves the right to unilaterally amend this Notice. The current version of the Notice is always available on our website, allowing you to stay informed of any changes. Upon request, we can also send you the current Notice electronically.

### **3. Data Transfer**

Our company is committed to ensuring that, in accordance with applicable data protection laws, your personal data will not be disclosed to third parties without your knowledge and consent.

#### Data Transfer to Our Clients

As a recruitment company, VIOLET Consulting may need to transfer applicants' data to our clients (employers, contractors), as they are responsible for making the final decisions regarding job applications.

#### Data Transfer to Service Providers

To provide our services at the highest possible standard, Violet Consulting may engage other companies to provide services. These providers primarily support website development, IT support, and marketing activities, and they may access and process your personal data as part of their work.

To protect your personal data, we require these providers to implement and maintain adequate data security measures. Violet Consulting will only transfer your personal data to a third country or

international organization if such transfer complies with Articles 44-49 of the GDPR.

#### **4. Legal Basis for Data Processing**

In addition to your explicit consent as described above, we may process your personal data based on the following legal grounds:

- 4.1. The processing is necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering into a contract.
- 4.2. The processing is necessary for compliance with a legal obligation to which we are subject.
- 4.3. The processing is necessary to protect your vital interests or those of another natural person.
- 4.4. The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
- 4.5. The processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms that require the protection of personal data, particularly if you are a child.

The processing of special categories of personal data may be based on the following legal grounds:

- 4.6. You have given explicit consent for the processing of your special data for one or more specific purposes.
- 4.7. The processing is necessary for Violet Consulting or you to comply with obligations and exercise specific rights in the field of employment, social security, and social protection law.
- 4.8. The processing pertains to personal data that you have made public.
- 4.9. The processing is necessary for the establishment, exercise, or defense of legal claims, or when courts act in their judicial capacity.

Please note that you are not required to provide your personal data to us; however, doing so may affect the provision of our services, and in certain cases, we may be unable to fully provide specific services without this data.

#### **5. Your Rights Related to Data Processing**

##### **Withdrawal of Consent**

You are entitled to withdraw your consent to the processing of your personal data at any time, without providing any justification, and without incurring any financial or other obligations as a result.

##### **Right to Access and Information**

You have the right to receive confirmation as to whether your personal data is being processed, and if so, to access information related to the data processing (purpose of data processing, categories of personal data, source of the personal data, etc.). Furthermore, please be informed that you have the right to request a copy of the personal data subject to processing.

##### **Right to Rectification**

You have the right to request the correction or supplementation of your personal data that we process.

Upon receiving such a request, we will promptly take action to rectify and complete the data without delay.

### Right to Erasure

You have the right to request the prompt deletion of your personal data that we process if any of the following reasons apply:

- 5.1. the personal data is no longer necessary for the purpose for which it was collected or otherwise processed;
- 5.2. you withdraw your consent on which the data processing is based, and there is no other legal basis for the processing;
- 5.3. you object to the data processing, and there are no overriding legitimate grounds for the processing;
- 5.4. the personal data has been processed unlawfully;
- 5.5. the personal data must be deleted to comply with a legal obligation in Union or Member State law applicable to the data controller;
- 5.6. the personal data was collected in connection with offering services related to the information society.

Please note, however, that the right to erasure is not unlimited and may be restricted by applicable Union and national data protection laws.

### Right to Restrict Data Processing

You are entitled to request the restriction of data processing in the following cases:

- 5.7. You contest the accuracy of the personal data; in this case, the restriction applies for the period necessary for the data controller to verify the accuracy of the personal data;
- 5.8. The data processing is unlawful, and instead of erasure, you request the restriction of data processing;
- 5.9. We no longer need the personal data for processing purposes, but you require it for the establishment, exercise, or defense of legal claims; or
- 5.10. You have objected to the data processing; in this case, the restriction applies for the period necessary to determine whether the data controller's legitimate grounds override your legitimate grounds.

After the restriction of data processing, personal data subject to restriction may only be processed, apart from storage, with your consent, or for the establishment, exercise, or defense 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.

You also have the right to receive the personal data you provided to us in an electronic format and to transmit it to another data controller.

### Right to Object

You have the right to object to the processing of your personal data if the data processing is for direct marketing purposes. In this case, the personal data subject to the objection may no longer be processed for direct marketing purposes.

In matters related to your complaints, you have the right to lodge a complaint with the competent data protection supervisory authority.

If you wish to exercise the rights mentioned above, please contact us in the manner specified in point 7.

We would like to inform you that Violet Consulting is not a public authority or any other body performing a public task, and does not carry out regular and systematic large-scale monitoring of data subjects, nor does it process data related to criminal offenses. Therefore, our company does not have a data protection officer.

## **6. Data Retention Period**

We store your personal data for a period of 5 years or as long as necessary to provide the services you utilize and to fulfill the data processing purposes defined by us. Upon your explicit request for deletion, we will promptly remove your data from our records or take appropriate measures to ensure you are no longer identifiable based on the data we hold.

## **7. Contact Us**

If you have any questions or comments regarding this Notice, or wish to exercise any data protection rights, please contact us at:

- E-mail: [info@violet-consulting.hu](mailto:info@violet-consulting.hu)
- Phone: +36-30-684-51-28; +36-30-540-10-90