

Data Privacy Declaration applicable for external applicants

Applicability: to **external** applicants of ALPIQ ENERGY SE Branch Office in Hungary

Status of the data protection declaration: May 2018

In this document, our companies ALPIQ ENERGY SE and Alpiq Services CZ s.r.o. ("Alpiq") provide **applicants an overview of the processing of their personal data** and their rights according to the EU Data Protection Regulation (the "GDPR"). **The personal data is processed for recruiting purposes.**

1. Who is the data controller, who is responsible for data processing and whom can you contact if you have questions?

The **data controller** is the entity you applied for job at, i.e.:

ALPIQ ENERGY SE Branch Office in Hungary
1085 Budapest, Kálvin tér 12, Hungary

Data Protection Officer of the Alpiq Group:

Alpiq AG
Alpiq Group Data Protection Officer
Bahnhofsquai 12
CH-4601 Olten, Switzerland
T.: +41 62 286 71 11 (Exchange)
privacy@alpiq.com

Local Privacy Partner of ALPIQ ENERGY SE Branch Office in Hungary.

ALPIQ ENERGY SE Branch Office in Hungary
Peter Vamos
1085 Budapest, Kálvin tér 12, Hungary
Tel: +36 1 886 34 00
privacy.alpiq.hu@alpiq.com

2. What sources and personal data does Alpiq use and for what purpose?

Alpiq processes personal data received from **applicants or recruiters** as part of the recruitment process.

Relevant personal data are, for example, data for personal identification, for work permits, for certificates and qualification reports, for suitability for a position.

If services are provided to applicants that go beyond **the specific processing purposes for the recruitment process**, Alpiq may have to collect additional personal data or may use data received from third parties. These are collected from public sources or institutions. References will only be obtained with the applicant's consent.

3. On which legal basis will your data be processed?

Alpiq processes personal data in compliance with the provisions of the GDPR and of the Act No. 101/2000 Coll., on Personal Data Protection.

3.1. Processing on the basis of your consent (Art. 6 para. 1a GDPR)

If you have given us your consent to process personal data for specific purposes, it is due to that consent, that this processing is lawful. A given consent can be withdrawn at any time. This also applies to the withdrawal of consent-declarations issued to us prior to effectiveness of GDPR, i.e. before 25 May 2018. Please note, that the withdrawal will only take effect in the future. Processing that took place before the withdrawal is not affected by this. You can request an overview of the consents given to us at any time.

3.2 Processing for the fulfilment of pre-contractual and contractual obligations (Art. 6 para. 1b GDPR)

Personal data is processed for the purpose of recruitment.

3.3 Processing due to legal obligations (Art. 6 para. 1c GDPR)

Alpiq is also subject to various legal obligations, i.e. legal requirements, including those relating to archiving obligations, legal enforcement and data privacy obligations. In processing operations based on the fulfilment of a legal obligation, Alpiq aligns with legal requirements.

3.4 Processing for the protection of legitimate interests (Art. 6 para. 1f GDPR)

To the extent necessary, we process your data beyond the fulfilment of the contract to protect our legitimate interests or those of third parties. Examples:

- Measures for the further development and improvement of HR processes and services;
- Assertion of legal claims and defence in legal disputes;
- Prevention and investigation of criminal offences (security check on individuals for defined functions and tasks); or
- Measures for building and system security (e.g. access control via access badges and video surveillance to protect and prevent intrusion by unauthorised persons) - for detailed information about the video surveillance please visit the Alpiq reception desk.

4. Who receives your personal data?

Within and **outside** Alpiq, only those entities receive your personal data, which require them to fulfil their **contractual** and **legal obligations** or to safeguard their legitimate interests.

Relevant recipients within Alpiq are, for example, superiors or divisions responsible for staff administration and management.

Relevant recipients outside Alpiq are, for example, order data processors (in countries mentioned within the Data Privacy Directive (D-GR-24), having an adequate legal protection for the rights and freedoms of data subjects when processing their personal data), business partners, companies (for authorised reference information), authorities or staff service providers.

Further recipients of personal data may be those bodies for which you have given us your data-transfer consent (e.g. training organisers, event organisers, assessment service providers).

All recipients are subject to strict data protection regulations.

5. Is your personal data transferred to a third country?

Data will only be transferred to a third country (country outside the EU/EEA) if this is necessary to **fulfil the contractual obligations, if it is required by law** or if you have given us your **consent**. We will inform you separately about details, if required by law. Contractors in third countries are obliged, by means of [standard data protection clauses](#) and additional obligations, to meet the same high data protection requirements as apply in the EU/EEA.

6. How long will your data be stored?

If necessary, we process your personal data during the recruitment process. Applicant profiles and application documents shall be deleted immediately after the recruiting process is finished.

7. What data protection rights do you have?

7.1 Your data protection rights

Each data subject has a **right of access** to the processed personal data (Art. 15 GDPR). Such right shall not adversely affect the rights and freedoms of others. In addition, the data subject has the right to have personal **data corrected** (Art. 16 GDPR) in case of inaccurate or incomplete information. Furthermore, every person has the right to have his personal **data deleted** (Art. 17 GDPR), the right to **restrict the processing** (Art. 18 GDPR) of his personal data, the **right to object** (Art. 21 GDPR) to the processing of his personal data and - where applicable - has the right to **data portability** (Art. 20 GDPR).

These rights may be the subject of limitations imposed by other statutory requirements and exceptions.

7.2 Your right of objection pursuant to Art. 21 GDPR

If data processing takes place based on your consent, it can be withdrawn at any time. This also applies to the withdrawal of consent-declarations issued to us prior to the effectiveness of GDPR, i.e. before 25 May 2018. Please note that the withdrawal will only have an effect on future time periods. Processing that took place before the withdrawal is not affected.

Right of objection in individual cases

You have the right to object at any time to the processing of your personal data which are processed based on Article 6(1)(e) GDPR (public interest) or Article 6(1)(f) GDPR (legitimate interest). This also applies to profiling within the meaning of Art. 4 No. 4 GDPR. If you submit an objection, Alpiq will no longer process your personal data, unless there are compelling grounds for further processing that outweigh your interests, rights and freedoms or in case the processing serves to assert, exercise or defend legal claims.

Right of objection to the processing of data for direct marketing purposes

If your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for the purpose of such advertising; this also applies to profiling, insofar as it is associated with direct marketing. If you object to the processing of your personal data for direct marketing purposes, the personal data will no longer be processed for this purpose.

The objection can be submitted informally by email at any time to the Local Privacy Partner: privacy.prague@alpiq.com.

7.3 Right of objection to the competent supervisory authority pursuant to Art. 77 GDPR

In addition, every person has the right to lodge a complaint with the competent national supervisory authority. The list of competent supervisory authorities by country can be found here: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

Appropriate national data protection authority for Hungary

The Office for Personal Data Protection
Nemzeti Adatvédelmi és Információszabadság Hatóság
1125 Budapest, Szilágyi Erzsébet fasor 22/c. 3.
Phone: +36 (1) 391-1400
Email: ugyfelszolgalat@naih.hu

8. Are you obliged to provide your personal data?

For the purpose of carrying out the recruitment process, you only need to provide us with the required personal data that we are legally obliged to collect.

For selected specific positions, where it is objectively justified, Alpiq may ask you for further personal data. This may be the case due to legal obligations or specific due diligence in connection with the job occupation. Additional information required might concern an extract

from the criminal register, an extract from the debt collection register, confirmations of ongoing criminal proceedings, health and safety checks. This data will not be passed on to third parties.

9. To what extent is there automated decision making for individual cases?

We do not use automated decision making according to Art. 22 GDPR to carry out the recruitment process. Should we use these procedures in individual cases, we will inform you separately, insofar as this is required by law.