

Privacy Notice

1. Introduction

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who uses our website and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”). Please read this Privacy Notice carefully and ensure that you understand it.

This Notice applies where we are acting as a data controller with respect to the personal data of our website visitors in other words, where we determine the purposes and means of the processing of that personal data.

2. Information about us

This website is an initiative of Unifiedpost Kft. (hereinafter Unifiedpost) a company incorporated and existing under the laws of Hungary with registered address at 1117 Budapest, Alíz u. 3, Office Garden IV and with company number 14463053-2-43 referred to as “Unifiedpost” or “we” or ‘us’).

Questions regarding this Privacy Notice can be regarded to the following contact details:

Email address: hu.info@unifiedpost.com

3. What is personal Data?

Personal data is defined by the by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in section 5 of this Privacy Notice.

4. What are my rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in section 8.
- b) The right to access the personal data we hold about you. Section 8 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in section 8 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please note that this right is not absolute and can only be exercised (i) if we no longer need your personal data for the original purpose, (ii) if you withdraw your consent for processing it, (iii) if you object to us processing your personal data for our legitimate interest, (iv) if we unlawfully process your personal data or (v) if a local law requires us to erase your personal data. Please contact us using the details in section 8 to find out more.
- e) The right to restrict (*i.e.* prevent) the processing of your personal data. You have the right to ask us to restrict the use of your personal data if (i) you believe that the personal data which we hold is inaccurate, (ii) we are processing the personal data unlawfully, (iii) you have objected to us processing your personal data for our legitimate interests or (iv) we no longer need the personal data for the purposes of processing but you want us to keep this for the establishment, exercise or defence of legal claims.
- f) The right to object to us using your personal data for a particular purpose or purposes. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate

grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims

- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- h) Rights relating to automated decision-making and profiling. You have the right not to be subject to decisions which may legally or significantly affect you and that were based solely on automated processing using your personal data. We will however not use your personal data in this way.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

We will always apply restrictions of your rights in accordance with the GDPR and on a case-by-case basis, after we carefully consider all the relevant facts.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in in section 8.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. The contact details of your supervisory authority can be found [here](#). You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in section 8.

5. What personal data do we process?

In this section we have set out:

- a) the general categories of personal data that we may process;
- b) the purposes for which we may process personal data; and
- c) the legal bases of the processing.

Depending upon your use of our website, we may collect some or all of the following personal data:

Usage data

We may process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website. However, where we collect usage data through non-essential cookies, we may request your consent. For more information please check our [cookies policy](#).

Job application data

We may process your information like your contact details, your CV and your cover letter ("**job application data**"). The job application data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details.

The application data may be processed for the following purposes: to assess your skills, qualifications, and suitability for the role, communicate with you about the recruitment process, keep records related to our hiring processes.

The legal basis for processing Job application data is your consent. We may retain personal data from your CV for as long as it is necessary for our recruitment process but not longer than one year. You may withdraw your consent at any time via hu.info@unifiedpost.com.

Enquiry data

We may process information contained in any enquiry you submit to us regarding our company and/or our services

("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is your consent.

Whistleblowing data

When submitting a whistleblower report, you may choose to do so anonymously. If you choose to identify yourself, we may collect your first and last name, email address, home address, and phone number. In addition, we may process personal data contained in the whistleblower report, which may, depending on the case, include identity information, information about the misconduct being reported, about the witnesses and third parties which were involved in the whistleblowing case, and information about the persons mentioned in the reports because they are victims of undesirable behaviour committed by the persons reported. We process these data to carry out preliminary investigations regarding the reported whistleblowing. The legal basis for processing these personal data is our legal obligation, namely an applicable national law transposing the EU Directive 2019/1937 on the protection of persons who report breaches of Union law (hereinafter Whistleblowing Directive). When the Directive doesn't apply, you still have the opportunity to submit a whistleblower report since Unifiedpost is committed to the highest standards of integrity and accountability. In that case, our legal basis is a legitimate interest to prevent and suppress any unlawful acts within Unifiedpost.

In principle, we do not request or process any special categories of personal data (also known as sensitive personal data), e.g. information on racial and/or ethnic origin, religious and/or ideological convictions, trade union membership or sexual orientation nor personal data related to criminal convictions. However, such personal data may be contained in a whistleblower report. We will process such personal data when it is necessary for the establishment, exercise or defence of legal claims. To the extent that such legal basis would not exist, we would stop processing such personal data immediately.

Other's data

We may process any of your personal data identified in this Notice where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this Notice where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

6. Do you share my personal data?

6.1. Use of processor(s)

We are free to rely on data processors (which may include any member of the Unifiedpost group). A processor is the natural or legal person who processes your personal data upon request and on behalf of us, the controller. The processor is required to ensure the security and confidentiality of the personal data. The processor will always act on our instructions. We may rely on processors for hosting purposes, administrative purposes, marketing purposes, analytic purposes, communication purposes, whistleblowing purposes.

With a view to the optimal protection of your personal data, we have made the necessary contractual arrangements with our processors to ensure that they apply the highest privacy standards. In any event, data processors shall be required to ensure the security and confidentiality of the personal data.

6.2. Transfer of personal data to third parties

In addition to the specific disclosures of personal data set out in this section protect your vital interests or the vital interests of another natural person, we may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. We may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another

natural person.

7. International transfers of your personal data

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law. However, if it concerns a subsidiary of the Unifiedpost Group which is located outside the EEA, your personal data may be subject to an international transfer. In such event, we will make sure that adequate safeguards enabling such transfer are put in place.

7.1. How long will you keep my personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept until you delete your account or as long as required by mandatory law. Your data personal data will therefore be kept for the following periods:

Type of Data	How long we keep it
Usage data	Please check our cookies policy for the detailed retention periods
Enquiry data	6 months
Job application data	1 year
Whistleblowing data	6 months when it concerns closed cases

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained.

Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

8. How can I access my personal data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in section 8 (*How do I exercise my rights?*).

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 15 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

9. How do I exercise my rights?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: hu.info@unifiedpost.com.

10. How do we protect your personal data?

The security of your personal data is essential to us. To protect your data, we will take appropriate technical and organisational precautions. This means that we have the necessary policies and procedures and IT security measures in place to ensure the confidentiality and integrity of your personal data. These policies, procedures and measures are periodically updated to keep them in line with regulations and market developments.

Internal access to the personal data is limited on a strict 'need-to-know' basis. Only authorized personnel, whose

activity will be monitored to prevent any misuse, will be able to access the personal data.

11. Third party websites

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

12. Personal data of children

Our website is targeted at persons over the age of 18. If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

13. About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

For more information on the cookies that we use, we refer to our [cookie policy](#)

14. Changes to this Privacy Notice

We reserve the right to change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our website in a way that affects personal data protection and privacy.

Every change will be posted on our website. We advise you to consult our Privacy Notice regularly to be kept up to date.