

PRIVACY POLICY AND DATA PROTECTION

1. THE PURPOSE OF DATA PROTECTION POLICIES

United Call Centers Kft. (Ltd.) (3525 Miskolc, Kis-Hunyad utca 9/2., hereinafter service provider, data controller), as a data controller, acknowledges itself bound by the content of this legal notice. It undertakes that all data processing related to its activities complies with the requirements set in these regulations and in force in the applicable national legislation as well as in EU legal acts.

The data protection guidelines arising in connection with United Call Centers Kft. (Ltd.)'s data management on the online interface are continuously available at www.unitedcallcenters.hu/adatvedelem and in the footer of www.unitedcallcenters.hu, on all subpages.

United Call Centers Kft. (Ltd.) reserves the right to amend this legal notice at any time. Of course, it will notify the audience of any changes in a timely manner.

If you have any questions regarding this notice, please contact us and our colleagues will answer your question as soon as possible.

United Call Centers Kft. (Ltd.) is committed to the protection of its customers' and partners' personal data, and considers it extremely important to respect the customers' right for information self-determination. United Call Centers Kft. (Ltd.) treats personal data confidentially and takes all security, technical and organizational measures that guarantee the security of the data.

United Call Centers Kft. (Ltd.) describes its data management practices below.

2. INFORMATION ABOUT THE DATA CONTROLLER

If you would like to contact our Company with questions or concerns regarding data handling, you can contact the data controller at adatvedelem@unitedcallcenters.hu and +36/46757775.

United Call Centers Kft. (Ltd.) will delete all e-mails received, together with the e-mail address (optionally message, its content) and personal data after a maximum of 2 years from the receipt. The process of data handling in case of contacting at karrier.mc@unitedcallcenters.hu, which is available on the interface, will be elaborated on in the later sections of this document.

Data about the data controller:

Name: United Call Centers Kft. (Ltd.)

Headquarters: 3525 Miskolc, Kis-Hunyad utca 9/2.

Company registration number: 05 09 018137

Tax number: 11843157205

Phone number: +36 (46) 75 77 75

E-mail: info@unitedcallcenters.hu

3. RANGE OF PERSONAL DATA PROCESSED

3.1. Data handling in connection with United Call Centers Kft. (Ltd.)' services

Data handling related to UCC services is essentially limited to the B2B sector, therefore data management basically includes electronic mail, telephone or written communication and information to and from customers containing essential information related to the provision of services.

Purpose of data management: To keep in touch with the services provided by UCC (a list of services is available on the UCC official website) in connection with the performance of the contract.

Range of data processed:

- In case of contractual partners in general:
 - Name
 - Address
 - Phone number
 - Email address

Legal basis for data management: The fulfillment of the contract is the legal basis for data management in all cases.

Duration of data management: Duration of service usage.

Method of handling data: paper-based and electronic

3.2. Data handling of United Call Centers Kft. (Ltd.)'s business partners connected to UCC's services

During the fulfillment of the contracts concluded with the business partners, the communication and the resulting data management are necessary.

Purpose of data management: To ensure communication throughout the contractual relationship between the contact person(s) provided by UCC and the Partner.

Range of data processed:

- Partner information in general
 - Name
 - Email address
 - Phone number
 - Company name and position held at the respective company (if applicable)

Legal basis for data management: It is in the legitimate interest of both parties to ensure proper communication to achieve the smooth running of business.

Duration of data handling: The duration of the contract, but in case the personal data is present in the contract and/or invoice as well, 8 years based on Hungarian regulations.

Method of handling data: paper-based and electronic

3.3. Data management of the United Call Centers website in general

United Call Centers Kft. (Ltd.) has its own website, which is available at www.unitedcallcenters.hu. The website does not have automatic data collection as previously indicated, only the cookies required to use the site. There is no registration on the website.

Visitors can contact UCC at the contact details on the website, which is operated by Forpsi.

The purpose of data management: To identify the visitors who initiate contact on the website, to make the electronic services available to them.

Range of data processed:

- Name

- Email address
- Content of the message

Legal basis of data management: Infotv. relevant consent pursuant to Section 5 (1) (a)

Duration of data handling: until the realization of the data management goal, the data received at the electronic mail address will be kept for 5 years after the reply to the letter.

Method of data storage: electronic.

3.4. Data sent to the email address provided in job advertisements

The website of United Call Centers Kft. (Ltd.), under the Career menu item provides the opportunity for jobseekers to apply for current job advertisements. UCC may also advertise on other online and offline platforms, where the same data handling rules apply to the human.resources@unitedcallcenters.hu e-mail address.

The purpose of data management: To provide information about the current job offers of UCC, to contact us for the purpose of applying for a job. The applicant can send his / her CV and data to the e-mail address on the career page, which is human.resources@unitedcallcenters.hu. On the website, it is also possible for the candidate to request information, where the relevant Privacy Policy is available. It is also possible to send a text message and attach a file. File attachment, as an option, applies to documents required by the application form, all other attachments that are not relevant for job application will be deleted.

Range of data processed:

- In case of data sent to the email address
 - Data provided in the CV
 - Email address
- In case of the application form
 - Name
 - Email address
 - reCaptcha ID (has its own Privacy Policy)
 - any other data forwarded optionnally (subject, message, attachment)

Legal basis for the data management: Based on regulation CXII. 6§ from 2011's Infotv.

Duration for handling such data: Until the withdrawal of the applicant's consent, but for a maximum of 2 years from the receipt of the CV. The applicant may withdraw his / her consent to the storage of the CV at any time by replying to the letter flow and may exercise his / her rights as indicated in this prospectus.

Method of handling data: electronic

Candidates will receive an automatic reply letter to their e-mail inbox outlining the relevant data management features. In case of a positive evaluation, the applicants will be invited for the selection process and a job interview, in case of an unsuccessful application, we will send feedback in the form of an e-mail, with similar content, in which we will inform the applicants about the relevant personal data processing conditions.

3.5. Data handling related to the selection process/ interviews

Purpose of data management: UCC provides the possibility for prospective employees who receive information about current job offers during online and / or offline campaigns to submit their application electronically to the relevant organizational unit. The purpose of data management is therefore to meet the administrative needs of the job interview, such as connecting organizations requiring labor, ensuring the effective outcome of temporary employment and / or recruitment, which is preceded by selection, also known as a job interview.

Range of data processed:

- selection, interview
 - Application form
 - Name
 - Date and place of birth
 - Permanent address
 - Mailing address
 - Email address
 - Phone number
 - Educational background
 - Language knowledge
 - Results of tests
 - Tests
 - Name
 - Email address
 - AC
 - Name
 - Date and place of birth
 - Address
 - Phone number
 - Email address
 - Highest educational level

Legal basis for the data management: The applicant's consent during the interview, and subsequently the legal basis for employment and fulfilment of the contract.

Duration for handling data: In case of a successful job interview, the duration for data handling in case of employment, employees; in case of an unsuccessful job interview, the deadline for fulfilling the data management purpose, or in case of the applicant's consent, further data processing for 2 years from the declaration (to offer additional job opportunities). The statement will be presented and signed before the interview.

Method of handling data: paper-based and electronic

3.6. Chat

Purpose of data management: In case of any interest in the whole or the units of the services of United Call Centers Kft. (Ltd.), our colleagues can answer the questions and inquiries through the chat interface. The data voluntarily provided when starting the chat service is necessary for contacting us, the data is not stored by our system.

Range of data processed:

- Name
- Any other data provided by the person contacting us

The legal basis and the duration of data handling: The chat application is powered by ManyChat (San Francisco, California, United States, <https://manychat.com/privacy.html>) and Facebook (1 Hacker Way, Menlo Park, California 94025, <https://www.facebook.com/privacy/explanation>). The data of the person contacting UCC is stored by ManyChat and Facebook, in both cases the specific conversation between the data subject and United Call Centers Kft. (Ltd.), which can be deleted at the request of the data subject. Chat service data controllers:

- ManyChat INC. Privacy Policy: <https://manychat.com/privacy.html>
- Facebook Privacy Policy: <https://www.facebook.com/about/privacy/update>

3.7. Newsletter

The purpose of data management: To send a newsletter to the data subject, to provide immediate and accurate information about the new job opportunities at United Call Centers Kft. (Ltd.) in the interest categories selected by them, market research, information on current news, personal offers, contact. The data controller does not use or may use the entered data for different purposes than the above.

Legal basis for data handling: The informed and voluntary consent of the data subject pursuant to Section 5 (1) (a) of the Information Act and Article 6 (1) of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation)

Range of data processed:

- First name
- Last name
- Email address
- Job offers interested in

Duration of handling data: Until the withdrawal of the data subject's consent.

The data controller handles the data provided until the data subject unsubscribes from the newsletter by clicking on the "Unsubscribe" button at the bottom of the newsletter. The data subject also has the opportunity to change his / her data or unsubscribe in his / her registered profile, and by post to the following address: 3525 Miskolc, Kis-Hunyad utca 9. II. em.

In case of unsubscribing, the data controller will no longer send more newsletters to the specified address.

Method of handling data: electronic

3.8. Technical details

United Call Centers Kft. (Ltd.) selects and operates the IT tools used for the handling of personal data during the provision of the service in such a way that the managed data:

- is accessible to those entitled to it (availability);
- authenticity and authentication are ensured (authenticity of data management);
- its invariability can be justified (data integrity);
- protected against unauthorized access (data confidentiality).

United Call Centers Kft. (Ltd.) protects the data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction.

United Call Centers Kft. (Ltd.) ensures the protection of the security of data management with technical, organizational and organizational measures that provide a level of protection appropriate to the risks arising in connection with data management.

During data management, United Call Centers Kft. (Ltd.) retains:

- **confidentiality:** protects information so that only those who have authority can access it;
- **integrity:** protects the accuracy and completeness of the information and the method of processing;
- **availability:** ensures that when an authorized user needs it, they can actually access the information they need and have the tools to do so.

Online test completion data management

Purpose of data management: United Call Centers Kft. provides a dedicated subpage on its electronic website, www.unitedcallcenters.hu, for applicants to complete tests online. The reason for this is the facilitation and support of process optimization and disruptions caused by physical constraints (eg geographical). The process of completing the test will be described and accepted before the interview. The login credentials will be sent to the applicant via an email by a colleague from the Human Resources Department.

Range of data processed:

- Name
- Email address

Legal basis for data handling: The applicant's consent during the interview, and subsequently the legal basis for employment and fulfillment of the contract. It does not store the data on the servers of United Call Centers Kft. (Ltd.), the results of the tests are received and evaluated only by the dedicated staff of Human Resources.

Duration of data handling: In case of successful test completion and interview process, the data handling deadline for employment and employees; in case of unsuccessful job interview, the deadline for fulfilling the data management goal, or in case of the applicant's consent, further data processing for 2 years from the declaration (to offer additional job opportunities).

3.9. Cookies

3.9.1 Cookie policy

- gathering information about visitors and their devices;
- making easier using the website;
- providing quality user experience.

In order to provide customized service a cookie is placed on the user's computer to be read on a later visit. If the browser send back a previously saved cookie, the cookie provider has the option to link the user's current visit to previous ones, but only regarding their own content.

3.9.2 Mandatory, session cookies

The purpose of these cookies is to enable visitors to fully and smoothly browse the website of United Call Centers Kft. (Ltd.), to use its functions and the services available there. The validity period of these types of cookies last until the end of the session (browsing), and when you close the browser these cookies are automatically deleted from your computer or from the other devices used for browsing.

3.9.3. Third party analytics cookies

United Call Centers Kft. (Ltd.) also uses Google Analytics (as a third party) cookies on its website. However, by using the Google Analytics service for statistical purposes, United Call Centers Kft. (Ltd.) does not collect information about how visitors use websites. United Call Centers Kft. (Ltd.) uses the data collected by third parties for statistical and marketing purposes, the collected data are not suitable for the identification of natural persons. These cookies also remain until expiration on the visitor's computer or other browsing device in its browser, or until the visitor deletes them.

3.9.4 Cookies used by this website

Type	Consent	Description	Validity
Status cookies	Not required	For proper functioning of the site	Until the end of session
Recaptcha (script)	Not required	SPAM filtering	Until the end of session
Analytics cookies (Third party)	Required	Marketing purposes	Defined by Google (https://developers.google.com/analytics/devguides/collection/analytics-usage)
Chat cookies (Third party)	Required	Chat service cookies	Defined by Facebook (https://www.facebook.com/policies/cookies/)
Marketing (Third party)	Required	Remarketing purposes	Defined by Google (https://developers.google.com/analytics/devguides/collection/analytics-usage)

3.10 Data management of community sites

Purpose of data management: On Facebook, Instagram and LinkedIn content provider and community pages United Call Centers Kft. (Ltd.) has its own profile, on the interface of which it shows content about activities/job opportunities/novelties of United Call Centers Kft. (Ltd.). UCC does not collect data from the community platform, does not compile further statistics, and does not analyze attendance neither otherwise nor in a way that would identify any natural person.

Legal basis of data management: By Infotv. pursuant to Act CXII of 2011 §5, the voluntary consent of the person concerned is made by registering on the Facebook page

(www.facebook.com), on the Instagram page (www.instagram.com) or on the LinkedIn platform (www.linkedin.com) and by liking the corporate website.

Duration of data management: As the data management takes place on the Facebook and/or Instagram and/or LinkedIn websites, the social site regulations governing prescribed by www.facebook.com, www.instagram.com, and www.linkedin.com apply to its use, be it the duration, method, deletion or modification possibilities of data management. The applicable privacy policies of the Facebook, Instagram and LinkedIn social media platforms are available at www.facebook.com/about/privacy, www.help.instagram.com and www.linkedin.com/legal/privacy-policy.

Method of data management: electronic.

4. PURPOSE, METHOD AND LEGAL BASIS OF DATA MANAGEMENT

4.1 General privacy policies

The data management of the activities of United Call Centers Kft. (Ltd.) is based on voluntary consent and legal authorization. In cases of data management based on voluntary consent, data subjects may withdraw their consent at any stage of the processing.

In certain cases the processing, storage and transmission of a given set of data is required by law, of which we notify our clients separately.

We would like to draw the attention of the users and clients to the fact that if they do not provide their own personal data to United Call Centers Kft. (Ltd.), are obliged to obtain the consent of the data subject.

Our data protection principles are in line with current data protection legislations, in particular:

- Act CXII. of 2011 – on Informational Self-determination and Freedom of Information (Infotv.);
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
- Act V. of 2013 – in Hungarian Civil Code;
- Act C. of 2000 – on Accounting;
- Act LIII of 2017 – Prevention and Combating of Money Laundering and Terrorist Financing;
- Act CCXXXVII. of 2013 – on Credit Institutions and Financial Enterprises.

5. STORAGE OF DATA

Your personal data (which can be connected to you) may be processed in the following way: on the one hand through internet connection, technical data (regarding the websites you visited with your computer, browser and IP) will be automatically generated in our computer

system; on the other hand You may provide your name, contact information or other details if you wish to contact us personally while using the website.

Data to be recorded during the operation of the system: those data of subject's computer which are generated during the voting and which are recorded by the system of United Call Centers Kft. (Ltd.) as an automatic result of the technical processes. Without the data subject's separate statement or action the automatically recorded data will be automatically saved at every sign in and sign out.

This data may not be linked to other personal user data – except in cases required by law. The data can only be accessed by staff belonging to the human resources department of United Call Centers Kft. (Ltd.).

6. DATA TRANSMISSION, DATA MANAGEMENT, THIRD PARTIES OF DATA KNOWLEDGE

United Call Centers Kft. (Ltd.) does not use a third party or data processor for the scope of data obtained during the contact points recorded above.

Those who become acquainted with the data are exclusively all employees belonging to the human resources departments of United Call Centers Kft. (Ltd.).

7. RIGHTS OF THE INDIVIDUAL AND ENFORCEMENT OF RIGHTS

The individual can request information about handling of their personal data, request correction of their personal data and – except for mandatory data processing – request their deletion, withdrawal, and enforce their rights of data transfer and right of objection via the method indicated during data collection, and via the above contact details of the data processor.

7.1 Right to be informed

United Call Centers Kft (Ltd) takes appropriate measures to provide the respective individuals all information mentioned in article 13. and 14. of the GDPR related to handling personal data and all briefings according to articles 15-22. and 34. in a concise, transparent, understandable and easily accessible format, composed in a clear and articulate way. Individuals can contact the data processor via adatvedelem@unitedcallcenters.hu with their questions pertaining to data protection, their observations, and they can enforce their rights described in this document via this address as well.

7.2 Right of access

The affected individual has the right to receive feedback from the data processor regarding whether their personal data is being processed, and if such a process is ongoing, they have the right to access the personal data and the following information: the purpose of data processing, the categories of the respective personal data; the recipients or category of recipients whom the personal data was or will be shared, including especially recipients from third countries, and international organisations; the planned duration of personal data

storage; the right of rectification, deletion or restriction of data processing and right to object; the right to submit a complaint addressed to the relevant supervisory authority; information pertaining to data sources; the fact of automated decision making, including profiling, and information related to applied logics and related understandable information, the significance of such data processing, and what foreseeable consequences it bears on the affected individual. The data processor provides information within one month maximum from the submission of request.

7.3 Right to rectification

The affected individual can request to rectify inaccurate personal data handled by United Call Centers related to them and provide missing data.

7.4 Right to erasure

The affected individual has the right in case one of the below justifications are present to request United Call Centers to delete personal data about them without any unjustified delay:

- the personal data are no longer required for the purpose they were collected for or were handled in different ways;
- the affected individual withdraws their consent forming the basis of data processing, and the data processing has no other legal basis
- the affected individual objects to data processing, and there is no legal reason with priority for data processing
- the personal data were processed illegally
- the personal data must be deleted to meet the legal requirements demanded by Union or Member State law
- the data were collected for the purpose of offering information society services

Data deletion cannot be requested if the data processing is necessary for: practicing the right of freedom of expression, the right to information; fulfilling the requirements of Union or Member State Law obligations for the procession of personal data, and due to public interest or for the completion of a task during the practice of a public authority licence conferred on the data processor; due to reasons related to public health, or archival, scientific and historical research or statistical reasons, because of public interest, or to make, enforce or protect legal claims.

7.5 Right to restrict processing

United Call Centers Kft (Ltd) restricts data processing if one of the below conditions are met:

- the affected individual disputes the precision of personal data, in this case the restriction refers to the duration which enables the review of the precision of personal data
- the data processing is illegal, and the affected individual objects to deletion of data, and instead requests the restriction of processing
- the data processor no longer requires the personal data for processing, but the affected individual requests them to make, enforce or protect legal claims; or

- the affected individual objected to data processing; in this case the restriction refers to the duration, until which it is determined whether the data processor's just causes take precedence over the affected individual's just causes.

If the data processing is restricted, the personal data with the exception of storage can only be processed with the permission of the affected individual, or to make, enforce or protect legal claims, or to protect the rights of another natural or legal person, or because of an important public interest of the Union or a Member State.

7.6 Right to data portability

The affected individual has the right to receive the personal data about themselves which they provided to the data processor in a separated, widely used, machine readable format, and transfer these data to another data processor.

7.7 Right to object

The affected individual has the right to object anytime due to reasons related to their own circumstances to data processing due to public interest or for the completion of a task during the practice of a public authority licence conferred on the data processor, or to processing required to enforce the just rights of the data processor or a third party, including profiling based on the aforementioned provisions. In case of an objection the data processor cannot handle the data any longer, except if its demanded by compelling reasons which take precedence over the interests, rights and liberties of the affected individual, or which are related to making, enforcing or protecting legal claims.

7.8 Automated decision making individual cases including profiling

The affected individual has the right to be excepted from the effect of a decision made solely based on automated data processing – including profiling – which would have a legal effect on them or affect them to a similarly significant degree.

7.9 Right to withdrawal

The affected individual has the right to withdraw their consent anytime.

7.10 Right to access to court

In case the affected individual's rights are violated they can appeal to court against the data processor. The court gives priority to the case.

7.11 Data protection authority

Complaints can be submitted to the Hungarian National Authority for Data Protection and Freedom of Information:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Address: 1530 Budapest, Pf.: 5.

Phone: 0613911400

Fax: 0613911410

E-mail: ugyfelszolgalat@naih.hu

8. OTHER PROVISIONS

We provide information about data processing not listed in this document at the time of data recording.

We hereby notify our customers, that the court, the prosecutor, the investigation authority, the authority dealing with administrative offences, the public authority, the National Authority for Data Protection and Freedom of Information, the Hungarian National Bank, and on the basis of an empowerment of a law other organisations can contact the data processor for information, data providing, transferring, and providing access to documents.

United Call Centers Kft (Ltd) only provides the kind of data and to the extent – in case the authority has determined the exact goal and the scope of data – which is definitely necessary to achieve the goals of the inquiry.