

PRIVACY POLICY

Effective: 2025.03.20.

I. Information to data subjects, main circumstances of processing

Legal grounds for data processing: the legitimate interest of the Data Controller, which is the recruitment of employees with the appropriate skills, abilities and qualifications for the relevant position.

The consequence of not providing data: the person cannot apply for the advertised position.

Categories of data subjects whose data are processed: external applicants and employees of the Data Controller.

Purpose of data processing: To decide on the basis of the information provided by candidates for vacancies existing at the Data Controller (or even in the ASAHI group of companies), whether the applicant is suitable for the position in question, for the job in question. In addition, in the absence of a vacancy, the candidate may also submit his/her application in order to be contacted by the Data Controller to fill a vacancy that may arise.

Data Controller: Dreher Sörgyárak Zrt. (Registered office: H-1106 Budapest, Dreher Antal út 3. Phone: +36 (1) 432 9700 E-mail: adat@asahibeer.hu Website: www.dreherzrt.hu

Contact information of the **data protection officer:** adat@asahibeer.hu.

Handled personal data: the candidate's full name, address, e-mail address, telephone number, date of birth, educational qualifications, language skills, experience, photograph, position applied for, assessment results, willingness to travel, minimum expected salary, place of residence, duration of employment (fixed or indefinite), salary grade, benefits, basic salary offered, other personal data provided by the data subject in the free text sections.

Duration of data processing: in the case of an application for a specific position, until the position is filled or, if it is earlier, until it is deleted at the request of the person concerned (until the application is withdrawn), and, in the case of an application to send him/her further job enquiries, for 2 years from the date of registration.

Persons authorised to access the data: HR staff and managers involved in the selection process. The Data Controller does not process data of **minors**.

The Data Controller uses machine learning tools to assist in the initial screening of candidates.

These tools analyze CVs based on pre-defined criteria relevant to the specific job description. This analysis involves techniques such as keyword matching, natural language processing to extract relevant skills and experience, and potentially other methods to rank candidates based on their fit to the role. **The output of these tools is a ranked list of all candidates, which is then reviewed by a human recruiter.** The recruiter uses this information as an aid in their assessment but **makes the final decision regarding candidate selection. No fully automated decisions with legal or similarly significant effects on the candidate are made using these tools**, as a human always reviews and makes the final determination.

The Data Controller shall delete any **special data** provided by the data subject (trade union membership, religion, political or philosophical affiliation, health, biometric information), given that the purpose of the processing (see above) does not allow the lawful processing of such data by the Data Controller. No data is transferred to third countries or international organisations.

II. DATA SECURITY MEASURES The data processor stores the personal data you provide on secure servers and does not use sub-processors. The Data Controller shall take appropriate information security measures to ensure that the personal data of you are protected, among others, against unauthorised access or unauthorised alteration. For example, access to personal information stored on servers is logged, and based on that, it can always be checked who and when accessed personal data and what personal data were accessed. The Data Controller shall take appropriate organisational measures to ensure that personal data cannot become accessible to an indefinite number of persons.

The Data Controller does not use automated decision-making and profiling. The personal data may be accessed by the competent staff of the HR department of the Data Controller and the Data Processor.

III. **YOUR RIGHTS** Pursuant to Article 15 of the GDPR:

1. You may request **access to your personal data** as follows:

The data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information (set out in the Privacy Policy):

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority.

2. The Data Controller will provide a **copy of the personal data** processed to the data subject. The Data Controller may charge a reasonable fee for further copies requested by the Data Subject based on the administrative costs. If the Data Subject has submitted the request by electronic means, the information must be provided in a commonly used electronic format, unless the Data Subject requests otherwise. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

3. Under Article 16 of the GDPR, you have the right to request the **rectification of your personal data**. If the data subject so requests, the Data Controller shall rectify inaccurate personal data relating to him or her without undue delay.

4. Taking into account the purpose of the processing, the data subject has the right to request the **completion of incomplete personal data**, including by means of a supplementary declaration.

5. Under Article 17 of the GDPR, you have the right to request the **deletion of your personal data**, but please note the following before making a request: The Data Controller is obliged to erase personal data concerning the data subject without undue delay in the following cases:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject objects to processing by the Data Controller for legitimate interests and there are no overriding legitimate grounds for the processing;
- c) the personal data have been unlawfully processed;
- d) the personal data have to be erased for compliance with a legal obligation in Union or Member State law (Hungarian law) to which the Data Controller is subject.

The data subject's right to erasure may be limited only if the following exceptions in the GDPR apply, i.e. if the above grounds apply, the continued retention of personal data may be considered lawful if necessary for the establishment, exercise or defence of legal claims.

6. Pursuant to Article 18 of the GDPR, the data subject shall have the right to **request** from the Data Controller **the restriction of the processing of personal data** concerning him or her (interim measure), as follows: The data subject shall have the right to obtain from the Data Controller restriction of processing where one of the following applies:
- a) the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data;
 - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims, or
 - d) the data subject has objected to processing for the Data Controller's legitimate interests, pending the verification whether the legitimate grounds of the Data Controller override those of the data subject.

Where processing has been restricted in accordance with the foregoing, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence 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. A data subject who has obtained restriction of processing on the basis of the above shall be informed by the Data Controller before the restriction of processing is lifted.

7. Pursuant to Article 21 of the GDPR, the data subject shall have the right to **object to the processing of personal data** concerning him or her by the Data Controller as follows: The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data by the Data Controller for legitimate interests, including profiling based on such processing. In such case, the Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

IV. Right of the data subject to judicial remedy, complaint to a supervisory authority

If the data subject experiences unlawful processing, he or she may bring a civil action against the Data Controller. The case falls within the jurisdiction of regional courts. The data subject can also choose to bring the case before the court of his or her place of residence (for a list of courts and their contact details, see the link below: <http://birosag.hu/torvenyszekek>)

Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a **complaint** with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the GDPR. Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH) (National Authority for Data Protection and Freedom of Information) address: H-1055 Budapest, Falk Miksa utca 9-11., mailing address: H-1363 Budapest, P.O. Box 9., e-mail: ugyfelszolgalat@naih.hu phone: +36 (1) 391-1400 fax.: +36 (1) 391-1410 website: www.naih.hu If you are a national of another Member State, you can also complain to the authorities of the other Member State.

For issues and circumstances not covered by this Privacy Policy, the Public Privacy Policy of Dreher Zrt applies, which can be found at the following link (under Data Protection/GDPR): <http://dreherzrt.hu/nyilvanos-adatkezelesi-szabalyzata/>

Dreher Sörgyárak Zrt.
Data Controller