

# Data Protection Policy

**Kibit Solutions Ltd**

## 1. Introduction

The data protection guidelines of current document aim to summarize the handling of the personal data of our applicants, partners, clients and subcontractors.

Current policy explains the collection, usage and handling of the personal data of some our parties and describes how Kibit Solutions Ltd conform to legal requirements. The personal security of our applicants, partners, clients and subcontractors is of great importance to us and we are committed to protecting and safeguarding their data protection rights.

Current Data Protection guidelines only relate to the personal data of the visitors/users of our website, our applicants, partners and suppliers. As for Kibit Solutions Ltd employees, the Employee Data Protection guidelines are to be found on the company intranet surface.

## 2. What type of personal data do we collect?

### THE DATA OF OUR APPLICANTS

In order to be able to set up the most competent project team for our clients and to be able to provide our applicants the project most suitable to their competences and experience, we must make a comprehensive analysis concerning our applicants. The most relevant data and information are collected in order to ensure our applicants to work on the project suiting them best. This information includes name, contact information, relevant training, employment history, company information. Every applicant has the right to share further information about themselves.

The following list precisely details the information collected and stored about our applicants. Obviously, every applicant may decide not to share some information about himself/herself.

- Name
- Age/date of birth
- Gender
- Photo
- Contact information (telephone number, email address, temporary / permanent address)
- Education/training
- Language competences
- Employment history, project experience
- Data of the reference person
- Citizenship / place of birth
- Data on applicant's company, tax number or tax identification number
- Current remuneration, hourly fee
- Information on potential project interests and needs
- Any further information shared by the applicant relevant to project planning
- Other information shared by our partners

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- Information from a third source e.g.: employment websites.

### DATA OF OUR CLIENTS

Kibit Solutions Ltd must also collect and use information about its clients in order to be able to provide its services with the best quality and efficiency to its clients. This information mainly consists of individual information of employees working in a client organization.

In most cases, the information collected about our clients are the contact information of the contact person (name, responsibility, telephone number and e-mail address).

In some cases, we may also store information shared by our client organization. Kibit Solutions Ltd may also require further information to ensure its services.

### DATA OF OUR SUPPLIERS

In order to be able to ensure smooth cooperation, Kibit needs data and information on our suppliers, partners and subcontractors.

In most cases, contact information of the relevant person at the given organization is substantial for communication.

Other information may also be needed like employee competences and/or references. In these cases, the applicant data collection guidelines act as governing rules.

### VISITORS/USERS OF OUR WEBSITE

The limited quantity of data collected through our website concerning visitors and users is aimed to enhance user experience of the website and assist in handling our service surface. This includes information on the way our website is used, the frequency of website visits and the typical time within a day our website is mainly visited.

## 3. How is personal data collected?

### APPLICANT DATA

Personal information of our applicants is collected in two ways.

#### Personal information shared by our applicants

- Data provided on Kibit Solutions website, as part of an application form or a registration process
- paper-based resume handed over to the representatives of Kibit Solutions Ltd in person
- sending resume to the representatives of Kibit Solutions Ltd in an e-mail

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- interview conducted by a representative of Kibit Solutions Ltd
- Sending resume through social media (Facebook, LinkedIn)

### Personal information from other sources

Other sources are also available to collect information about our applicants. This information may be retrieved from the following sources:

- through reference persons;
- from our clients and partners;
- through employment websites;
- through Facebook or LinkedIn.

### CLIENT DATA

Personal information of our clients is collected in two ways.

#### Personal information shared by our clients

Our aim is to guarantee the best project team, which require proactive approach to gain information about and/or from our clients:

- our client contacts us or
- if we contact potential clients as part of our business development activity.

#### Personal information from other sources

Further information may also be available on our potential clients from other sources such as:

- market survey from a third party or an online or offline media analysis executed by Kibit's own representatives or by a professional organization
- list of participants of relevant events
- Search engines available for the public or with the help of social media

### SUPPLIERS DATA

Their personal data is collected during our cooperation.

### WEBSITE VISITORS AND USERS

On visiting our website, their data are automatically collected with cookies, according to the cookie settings of the browser.

On visiting our website, certain information may be collected automatically independently from the fact whether you would decide to use our services or not. Such information includes

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your IP address, the date, time and frequency of our website visits and the way you browsed the contents of the website.

### 4. How is personal data used?

#### APPLICANT DATA

The ultimate aim to collect personal data of our applicants is to help us in finding the most suitable applicants for a given project. In this case both competences and expectations are considered. The more relevant information we possess about our applicants' competences, needs and expectations, the better work match we may find for them.

The data of our applicants are used in the following activities:

#### **Project organization and execution activity**

The main area of our activity is project organization - linking project work with the corresponding competence. The following list contains the different methods used in order to handle and use the personal data of our applicants according to the legal regulations and circumstances.

- collecting the data of our applicants
- storing and if necessary, updating the data of our applicants in our database to be able to contact them during the different phases of project organization.
- providing project organization services and simplifying the process;
- analysing applicant data for fulfilling open positions;
- sending information to our clients about our applicants in order to ease project planning and to see the competences of the applicants to execute a given task;
- providing an opportunity for applicants to apply for certain projects
- performing the contractual obligations between the applicants and Kibit Solutions Ltd;
- performing contractual obligations between Kibit Solutions Ltd and third parties on selecting candidates;
- supporting the invoicing process;
- conduction client satisfaction surveys;
- supporting the legal requirements of collecting and paying taxes, contributions and other charges.

#### **Marketing activity**

We may send our applicants e-mails containing information about their interests or ask our applicants to recommend other applicants for our projects within their network. We intend to use their data for sending them details about reports, opportunities, network building and client events, which may be to their interest.

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### **CLIENT DATA:**

The main aim for using client information is to ensure the proper execution of the contractual obligations and thus, to guarantee a smooth contact.

Client information is used for the following:

#### **Project organization and execution activity**

The main area of our activity is project organization and execution. The following list contains the different methods used in order to use the personal data of our clients to make processes run smooth.

- storing and updating contact details of our partners to be able to get into contact with the employees and partners of our clients concerning project planning and execution.
- taking notes of our discussions and meetings to ensure a high level service.
- conducting client satisfaction surveys

#### **Marketing activity**

Handling client data to support our marketing activity (e.g.: references, recommendations)

#### **Forwarding, coercing and protecting legal needs**

Client data may be used to forward, coerce or protect legal needs.

### **SUPPLIER DATA**

The personal data of our suppliers are mainly used to be able to execute contractual obligations properly, to ensure smooth relationship and answer legal requirements.

Supplier data is used in the following ways:

- Data is stored and if necessary updated in our database to contact suppliers concerning our agreements.
- To offer services or to ask support or services from our suppliers and partners.
- To suit the legal requirements
- To help targeting the right marketing campaigns
- To forward, coerce and protect legal needs.

### **WEBSITE USERS AND VISITORS**

The visitor data of our websites is used to enhance user experience of our website to increase and focus the attention of clients, partners and applicants to our services.

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## 5. How is personal data shared?

### APPLICANT DATA

Applicant data is mainly shared with Kibit Solutions Ltd representatives or employees and with partners in order to support our business development and project planning activity in the region. We may also share applicant data with employees of our existing and potential clients with the exclusive aim of project planning and execution.

### CLIENT DATA

Client data is solely shared with our applicants, partners and suppliers in order to plan and execute our project activity.

For reference, we may share client data publicly to third parties after asking and receiving special permission from the clients in question.

### SUPPLIER DATA

Supplier data may be shared with our partners and clients and further parties in connection with project planning and execution unless otherwise agreed.

### WEBSITE VISITORS AND USERS

Kibit Solutions Ltd has the right to share website users and visitors data with internet analysis service providers, marketing automation platforms and social media service providers unless otherwise agreed.

### IN GENERAL

- if laws or regulations oblige the company, it must share any information with tax, audit and other authorities.
- we may share any data with third party providers upon special agreement with Kibit Solutions Ltd – e.g.: external consultants, professional consultants, lawyers, auditors, accountants, technical support and IT consultants;
- outsourced IT service providers, document storing or CRM service providers may also receive information as third party on condition that a proper data handling agreement is in force;
- Marketing technology platforms and suppliers;
- In case Kibit Solutions Ltd merges with or is acquired by another firm or has firm plans about this option, the new or potential owner(s) may receive any personal data collected.

## 6. How is personal data secured?

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Data protection is vital for us. We are committed to take any necessary steps to stop illegal access and abuse.

We are committed to taking every reasonable and necessary step to protect the personal information stored by Kibit in order to avoid abuse, data loss or illegal access. This is guaranteed by several technical and organisational actions. One of these actions is to handle a potential violation of data security.

If you have any suspicion about abuse, data loss or illegal access to your personal information, we ask you to inform us as soon as possible.

## 7. How long is personal data stored?

Our system automatically deletes contacts with which the company has not contacted for the last 5 years except for cases regulated by authorities.

By contact, we mean written or oral communication between two parties or active usage of our online services.

## 8. How to reach, modify or withdraw your personal data?

Any person or company in any type of connection with Kibit Solutions Ltd has the right to manage their personal data stored by Kibit Solutions Ltd.

If you would like to contact Kibit Solutions Ltd about a request or a question concerning your personal data, we will try to do our best and answer them as soon as possible as it is prescribed in the governing law. We may store these messages in order to help solve the arising problems and answer your questions.

- **The right to veto:** Anybody has the right to veto the storage and usage of their personal data for our business activity.
- **The right to withdraw one's consent:** Those people, who have given their consent to us to store and use their personal data for our business activity, have the right to withdraw their consent at any moment without any explanation.
- **The right to have access:** People, whose data is stored and used for our business activity, have the right to gain access as to the nature of data we store about them at any moment of time. They also have the right to modify, update or delete these data. In such cases, we may ask these persons to identify themselves and may also require further information about them.
- **The right to delete data:** Those persons, whose data is stored and used by Kibit during its business activity, have the right to ask the deletion of their personal data under certain circumstances. Upon request, we delete these data but also suppose that these people would

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not like to be contacted. This minimises the chance to contact these people in the future and collect their data. A different process is to be used upon special request.

- **The right to data portability:** People whose data are stored and used during our business activity have the right to transfer their data to another data handler. In such case, either we assist in transferring the data or provide an electronic copy.
- **The right to complaint at a supervisory authority:** People whose data are stored and used during our business activity have the right to make a complaint at a local supervisory authority.
- **The right to limited or restricted usage of personal data:** People whose data are stored and used during our business activity have the right to require a limited use of their personal data. This may not be changed until a) the below listed cases still stand or b) the given person does not give his/her consent or c) further handling is necessary to protect another person's rights or because of public interest of the EU or one of its member states.
- **The right for correction:** People whose data are stored and used during our business activity have the right to request the correction of any imprecise or incomplete personal data about them. If these persons' personal data have been shared with third parties, we inform them about the correction except when it is not possible or requires huge effort.

It is equally important to store up-to-date and precise information on personal data therefore we welcome any request to update personal data or information.

## 9. How is personal data stored and shared with our international partners?

Kibit Solutions Ltd is a regional organization, which give us the opportunity to realize outstanding IT projects. We need to store and hand over personal data at an international level to :

- other regional units of the company
- our partners;
- our partner involved in project organization.
- outsourced IT service providers as third party (document storing, CRM service) on condition that there is a valid data handling agreement;

Our aim is to store and forward your data in the safest possible way. To ensure safety of your data, we only forward data to outside the European Economic Area (member states of the European Union, Norway, Iceland and Liechtenstein) if it corresponds with data protection regulations.

## 10. LEGAL BACKGROUND TO DATA HANDLING



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## **RIGHTFUL INTERESTS**

According to pt (f of article 6 of GDPR, “companies may handle personal data if data handling is vital to validate the rightful interests of a third party except for those cases where the basic rights, interests and freedom of an individual outweigh these interests. In these cases, protection of personal data is given priority”.

We believe that these activities give us an opportunity to offer a more efficient and higher quality service to our clients, offer a more tailored project work to our applicants and subcontractors.

### **APPLICANT DATA**

We believe that once a professional has advertised his/her interests in looking for job opportunities, he/she shall be ready to accept our service which includes collecting personal data about him/her, use them in different ways with the ultimate aim to offer them proper project opportunities. Our aim is to offer the most suitable project opportunities to our applicants.

To ensure our smooth operations, we must use applicant data for our internal administrative activity.

Legal regulations require us to share personal data of our applicants for reasons of tax collection, criminal investigation, current or future litigation.

### **CLIENT DATA**

We aim to ensure that our clients receive the best services therefore we store the personal data of our clients and/or the personal data of certain contact persons as well as keep record of discussions and meetings. We also get involved in conducting customer satisfaction surveys. Such usage of client data is necessary for an organization providing services to make sure rightful interests are kept.

### **SUPPLIER DATA**

We store and use personal data of individuals working for our suppliers and subcontractors in order to simplify their ensuring services towards Kibit Solutions Ltd. We also store financial data to be able to pay invoices. We believe such activities are vital for our rightful interests.

## **CONSENT**

In certain cases, we are expected to acquire consent from our partners to handle their personal data in connection with certain activities. Consent or connivance is needed depending the way personal data are used.

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• Pt 11 of article 4 of GDPR says that „consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her”.

In other words:

- the person in question must give his/her consent without any external pressure;
- the person must fully understand the nature of his/her consent therefore we aim to provide sufficient information prior to his/her consent;
- the person involved must be able to decide which handling activities are acceptable and which are not.
- we must receive and keep record of affirmation from our partners.
- In certain cases, connivance may be sufficient as proof of consent. We have the right to offer our services to our clients until they unsubscribe from our list.

## **FORWARDING , VALIDATING AND PROTECTION OF LEGAL NEEDS**

In connection with validating and protecting legal needs, it might be necessary for us to handle personal data or sensitive personal data according to local regulations and requirements. Pt (f of par 2 of article 9 of GDPR allows this: „processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity”.

This may arise in case we need legal consultation in connection with a judicial process or law prescribes the storing and forwarding of certain information during the legal process.

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## APPENDIX 1 – HOW TO CONTACT US

### **When** to contact us:

- to reach, modify or withdraw your personal data;
- if you are suspicious about any type of abuse, data loss or illegal access of your personal data;
- to withdraw your agreement to handle your personal data
- in connection with any remark or proposal concerning current Data protection regulation.

### **How** to contact us:

Kibit Solutions Ltd  
2120 Dunakeszi, Rezeda utca 35/1.  
info@kibit.hu

## APPENDIX 2 – HOW TO CONTACT LOCAL SUPERVISORY AUTHORITY

### **Local supervisory authority information:**

**National Authority for Data Protection and Freedom of Information.**

Contact information:

- Telephone: (+36) -1-391-1400
- Address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.
- Fax: (+36)-1-391-1410