



Data Protection Policy

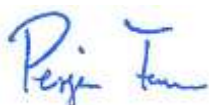
1. Regarding the activity performed based on the Contract, Service Provider (JobCTRL Informatikai Kft.; 1118 Budapest, Rétköz u. 7.; company registration number: Cg. 01-09-949636; represented by: Ferenc Perjés managing director; phone: +36 1 465 8808; e-mail: support@jobctrl.com is considered as data processor, Client is considered as Controller.
2. Purpose of data processing during the provision of the service: Analysing and developing business efficiency of Client
3. To this end, Client applies key performance indicators (KPI) that requires transparent workflow and provides an opportunity to improve work processes, make them more efficient thus enhancing effectiveness. These indicators are created via the aggregation of the key data generated during the work. The measurement of the key data required for the improvement of business efficiency is carried out using the software elements of the Service. While doing so, Client asks related employees to set JobCTRL applications in work status when performing the work set out in their employment contract which forms part of the analysis and improvement of efficiency, thus enabling the collection of key data for statistical purposes.
4. JobCTRL client performs central data collection exclusively in Work status (Internet addresses (URLs), window captions, e-mails, document names and paths, mobile coordinates, phone numbers, other specifically collected data) about which information is provided to the persons performing the work when installing the client software and during usage. Clients indicate this information in a text format, with icons and colours as well.
5. Employees can switch off the work status any time, and they can even set automatic rules for this purpose as they wish. There is an option to set central rules, that log out employees from the work status under certain conditions (e.g. when the system is evidently used for private purposes).
6. Similarly, under certain conditions (e.g. when the system is evidently used for work), there is an option to set entry rules. When the relevant conditions are met, the client automatically switches to Work status. In such cases the client informs the user about the changing the status using colours and icons. These rules can be set by the employee or Client's administrator centrally.
7. Based on the operational concept specified above, only work-related key data defined in accordance with the purpose of data collection for the analysis of efficiency and development and required for the aggregation of KPIs are collected. Employees can view these data any time (in the client, and in the Reports menu / Dynamic workflow report), modify or erase them (both in the client and on the website). Thus, the Service provides comprehensive opportunity for self-determination regarding the key data. To ensure the reliability of the measurement, the certain modifications and manual data recording is indicated as "Manual data modification".
8. Key data related to the work can be deleted from the system (in a time window to be set by the user in the client and on the website at organisational level, and also centrally and automatically based on various sets of Administrator data and for optional periods). In addition, usage for statistical purposes can be ensured without personalization via depersonalization (by rewriting the name and e-mail address of the user).

9. Service Provider provides all necessary assistance to Client to ensure the minimum amount of key data required for Client's business purposes and provide the most efficient analysis (data minimisation). When launching the system, the default setting is the data collection specified in the Contract.
10. Service Provider makes every effort to comply with the highest professional and legislative requirements. Accordingly, the ISO27001 certification is maintained and Service Provider submits to the relevant professional audits on a yearly basis.
11. Service Provider is entitled and obliged to store and process the work data of the Users included in the database according to the instructions of the Client.
12. Service Provider undertakes not to use the data collected for purposes other than the one specified above. Service Provider may not create a copy of such data in any way except for the backup copy required for normal operation of the Service.
13. Service Provider undertakes not to disclose the data acquired during the performance of the Contract to any third party.

Annexes:

Annex No. 1 Relevant context of processing

25 May 2018



Ferenc Perjés

Managing director

Annex No. 1 Relevant context of processing

Details and contact data of Controller:	Client as Controller
Contact details of the data protection officer, if any:	Contact persons appointed by Client
The relevant legitimate interest, in case of processing based on legitimate interest:	The purpose of processing is to analyse and develop business efficiency. The activities involved in analysis and development form the basis of the activity performed by the profit-making organisation, therefore high level of efficiency is essential in the market environment, it is almost vital for the operation of the Organisation. Without continuously analysing and developing efficiency the organisation can turn into losses and go bankrupt.
Recipients of personal data:	JobCTRL Informatikai Kft.; 1118 Budapest, Rétköz u. 7.; company registration number: Cg. 01-09-949636; represented by: Ferenc Perjés managing director; phone: +36 1 465 8808; e-mail: support@jobctrl.com
If the data are transferred to a country outside the EU, the fact that such transfer is performed and the description of the guarantees ensuring the protection of personal data:	No such data transfer is performed as the server of JobCTRL is located in Hungary.
Duration of storage of the personal data, or if it is not possible, the considerations based on which the storage period is determined.	The Company stores the data record for maximum 5 years, from the date when the data are generated. The data may be deleted earlier, if no longer required by the purpose of processing.
Providing information to the data subject about his or her rights to request access to and rectification or erasure of personal data or restriction of processing concerning the data subject and the right to object to processing as well as the right to data portability:	Data subject is entitled to request access to and rectification or erasure of personal data or restriction of processing concerning the data subject and may also object to processing and has the right to require the data concerning him or her (data portability).
Providing information about the right of withdrawal if processing is based on consent.	In this case it is not relevant as data controlling is not subject to consent.
The right to submit a complaint to the supervisory authority (in Hungary: Hungarian National Authority for Data Protection and Freedom of Information):	Supervisory authority: Hungarian National Authority for Data Protection and Freedom of Information (1125 Budapest Szilágyi Erzsébet fasor 22/c.).
Whether the provision of personal data is based on a legislative or contractual obligation, or is a precondition of the conclusion of a contract, whether the data subject is obliged to provide the personal data and what the consequences are if the data are not provided.	With reference to the considerations related to legal basis the application of JobCTRL in relation to the employees is not based on legislation, so this element of information is not relevant. On the other hand, in case of employees whose salaries and other benefits are provided based on the data

	<p>provided by JobCTRL, the information that JobCTRL is essential for the performance of the employment contract must be provided.</p> <p>The application of JobCTRL is based on the decision of the employee, it is essential to maintain the internal work order of the employee, consequently the consent is not required, the employee only needs to acknowledge processing. JobCTRL can be switched on and off, but it is not possible to ignore the whole system, it depends on the decision of the employer.</p>
<p>The fact that decision is made automatically, including profiling, and at least in such cases information related to the logic applied, the relevance and potential consequences of such processing on the data subject:</p>	<p>The purpose of processing is to measure and improve efficiency: In this context, measurement goals were set, that are indicated as KPIs, that is, key performance indicators in the system. During the launch of JC360 these KPIs are configured.</p> <p>JC360 automatically records relevant activities performed during the work to the extent it is necessary for the measurement. Upon demand, the system can record activities performed on computers or mobile devices. In addition, work-related meetings recorded in the calendar and manual records may also be included in the measurement process.</p> <p>As a first step of the launch, an activation e-mail is sent to set a password and download the appropriate client programme. After logging in, the client programme can be set in "work status" (green icon) or "non-work status" (red or yellow icon). Therefore, the application can be switched off any time, to ensure that private activities are not documented. Switches between the "work" and "non-work" status can be automated either centrally or at user level and the data recorded can also be erased retrospectively to ensure that only the data required for the relevant purposes are collected.</p> <p>The systems creates real-time analysis of the work documented that can be reviewed in the form of reports. Reports are available to anyone and users can view the data documented in relation to their work. Furthermore, these data are also available to the team leaders and the system administrator. The management primarily use aggregated KPIs for the analysis. The data and analysis are used exclusively within the organisation to analyse and improve efficiency which provides transparent, clear and</p>

	unambiguous goals and processes both for the organisation and the employees.
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