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Notice on Data Protection

1. Name of Data Controllers

Rába Járműipari Holding Nyrt. (Rába Automotive Holding Plc.)

Corporate Registry No. of Data Controller: Cg.08-10-001532
Seat of Data Controller: 9027 Győr, Martin út 1.
Tax ID of Data Controller: 11120133-2-08

Rába Futómű Kft. (Rába Axle Ltd.)

Corporate Registry No. of Data Controller: Cg.08-09-008494
Seat of Data Controller: 9027 Győr, Martin út 1.
Tax ID of Data Controller: 11923211-2-08

Rába Jármű Kft. (Rába Vehicle Ltd.)

Corporate Registry No. of Data Controller: Cg.08-09-008305
Seat of Data Controller: 9027 Győr, Martin út 1.
Tax ID of Data Controller: 11866536-2-08

Rába Járműalkatrész Kft. (Rába Automotive Components Ltd.)

Corporate Registry No. of Data Controller: Cg.08-09-009889
Seat of Data Controller: 9027 Győr, Martin út 1.
Tax ID of Data Controller: 12721380-2-08

2. Rules for data handling

The present Notice on Data Protection currently in force from 1 May, 2016 and modified on May 16, 2018 is valid until its withdrawal.

As the operator of www.raba.hu (hereinafter: website), the Company hereby informs its visitors that in connection with this website, personal data are processed only based on the information contained in this Notice on Data Protection. Contact to the Internal Data Protection Committee: bejelentes@raba.hu

This notice was drafted on the basis of the Company's Code of Data Protection and Data Security and its scope encompasses all processes implemented by the Company in the course of operating the website, in which personal data defined in the data protection laws are handled.

The terms used in this notice are identical with the definitions of the terms used in the data protection laws.

The Company hereby represents that it processes personal data only in the interest of exercising rights or discharging duties. Personal data thus processed shall not be used for private purposes; data processing will at all time comply with the principle of purpose limitation. In the event that the purpose for the data processing has ceased to exist, or should the processing of data be otherwise against the law, data will be deleted.

The Company processes personal data only upon prior consent of the party concerned or under the law or according to legal authorisation.

The Company ensures the conditions of accountability by the compliance with the GDPR's principles on handling of personal data.

The purpose of this notice is to ensure that the Company informs the data subject in each instance of the purpose and legal basis of the data processing.



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Employees responsible for data processing within the organisational units of the Company shall keep personal data in their possession as business secrets. To this end, employees processing personal data and those with access to personal data have signed a Confidentiality Statement.

The current number one executive of the Company established the data protection organisation, tasks and competences related to data protection and the related activities and appointed the persons responsible to supervise data processing in consideration of the characteristics of the Company.

In the course of their work, employees of the Company shall ensure that unauthorised persons shall have no access to personal data. Personal data are stored and kept in such a way that they shall not be accessible for viewing, changing or annihilation by unauthorised persons.

3. Enforcing the rights of the data subjects

The natural person that can directly or indirectly be identified based on the personal data, may request, at the published contacts of the Company, information on or rectification of his personal data being processed and may also request the erasure or blocking of his personal data, save where processing is rendered mandatory.

The Company shall respond to the request received of the data subject related to the processing of his personal data within maximum 25 days – 5 days, if the right to object is exercised - in writing, in a form commonly understood. If necessary, this deadline shall be extended by 2 months regarding the complexity of the request and the number of the requests. The data subject shall be informed about it.

The information shall encompass the information as defined in data protection laws, if the information provision to the data subject cannot be refused pursuant to the law.

The data subject shall have the right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, shall have the right to access to the personal data and the information defined in the data protection laws (right of access by the data subject).

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Company, in a structured, commonly used and type-written format and have the right to transmit those data to another controller (right to data portability).

As a general rule, the information shall be provided free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request.

The Company shall refuse to accommodate requests only for reasons as set forth in data protection laws, stating the reason and providing explanation in writing, as set forth in data protection laws.

Untrue or incorrect data shall be rectified by the head of the organisational unit processing the data – provided that the necessary data, as well as the documents providing evidence are available – and shall provide for the erasure/deletion of the personal data processed, of the causes as detailed in data protection laws are manifest (right to rectification).

For the period while the objection of the data subject to the processing of personal data is investigated - for a maximum of 5 days – the head of the organisational unit responsible for data processing shall suspend the data processing, shall investigate, whether the objection is justified and



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adopt a decision, of which he shall inform the applicant in writing, according to the data protection laws.

In the event that the objection is justified, the controller shall act as per the provisions of data protection laws.

According to the request of the data subject the Company shall erase the personal data concerning him or her without undue delay if one of the grounds defined by the data protection laws applies (right to be forgotten). The right to erasure shall not be applicable, if the processing is necessary for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject.

The data subject shall have the right to obtain from the controller restriction of processing according to the data protection laws (right to restriction of processing).

The Company shall be liable to pay for the damages caused to others through the unlawful processing of the data subject's data or through the breach of the requirements of data security, as well as for the restitution due for personal rights violation as well, caused by the data controller hired by the Company. The data controller shall be released from liability for damages and from paying restitution if s/he demonstrates that the damage or the violation of personal rights were brought about by reasons beyond his/her data processing activity. No compensation shall be paid where the damage or the violation was caused by intentional or serious negligent conduct on the part of the aggrieved party.

The data subject can file complaints regarding the data processing procedures of the Company with the National Authority for Data Protection and Freedom of Information (NAIH) as follows:

Name: National Authority for Data Protection and Freedom of Information
Seat: 1024 Budapest, Szilágyi Erzsébet fasor 22/C.
website: www.naih.hu

4. Data processing in the course of using the Company's website

Venue of data processing:

9027 Győr, Martin út 1.

4.1. Data processing of the website

Anyone can have access to the Company's website, without revealing his identity or providing any personal data and gain information freely, without limitation from the website and the linked pages. Non-personal information is gathered by the website of its visitors in an unlimited and automatic fashion. Such information, however, cannot reveal any personal data, thus it does not result in data processing under the effect of data protection laws.

The website uses the web analytics services of Google Analytics. Google Analytics uses cookies, i.e. text files placed on the computer of the visitor to the site, with the aim of helping analyse the use of the website. Information generated by the cookies and related to the use of the website (IP address of the visitor to the site) is forwarded to and stored at the US servers of Google. Google does not couple the information generated by the cookies with other data – therefore there is no processing of personal data as per the data protection regulation in force. By appropriately setting the browser of the visitor to the website, the use of cookies can be refused. By using the present website, the visitor to the site grants his consent to the processing of his data in the way and for the purposes described above. Google uses such information to analyse and evaluate the use of the website by the visitor to the site, as well as to compile reports regarding the activities carried out on the site and to provide other internet-related services. The IP address of the computer of the subject, as well as certain data of the computer, depending on the browser software, are col-



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lected and stored in the course of visiting the site in order to generate visiting statistics and to identify hostile IT attacks.

4.2. Applying for jobs at the members of the Rába Group

There are two ways in which personal data are revealed to the Company in the context of the selection of workforce: the Company searches for the suitable employee through recruitment to the jobs advertised (on the Company's own website, in press and online adverts, in the social media and occasionally through head hunters), occasionally, though, CV's find their way to the seat or branches of the Company, sent by the applicant directly either by post or electronically to the Company's mailbox (cv.human@raba.hu) or to someone's email address (firstname.lastname@raba.hu).

In terms of the CV's containing personal data received for the purpose of job application, the Company does not distinguish between the ways in which the CV's are received: those received in hard copy and electronically are treated identically.

In the course of the selection process, the Company guarantees the processing of the CV's as per this provision for CV's received through the career page operated by the Company, at cv.human@raba.hu or at the email address designated by the Company: firstname.lastname@raba.hu.

The same applies to CV's received per post. If the applicant forwards his CV to the postal address published in the recruitment notice, with the indication expected by the Company, the Company shall guarantee data processing as per this provision.

The Company operates an online career page. When using the career page, following registration, the applicant can directly upload his CV, as well as all data relevant to the job search to the career page of the Company.

As a principal rule, the Company divides the CV's into separate categories for further use. The CV's received are stored in the database for a period of 4 years from receipt, except the employee's CV. Subsequent to this, CV's are deleted from the Company's system, except for the data uploaded onto the career site, which are stored by the Company until deletion of the User. The deadline for data storage is calculated from the time the CV is received: in the case of CV's received electronically, such calculation is based on the date of receipt, whereas with paper CV's the Company always records the date of entry, which is logged onto the CV and the calculation is based on the date of filing.

The legal basis for data processing, for all CV's revealed to the Company, is granted by data protection laws, pursuant to which "the consent of the data subject shall be considered granted in connection with personal data he has conveyed in another case initiated upon request of the data subject."

The presumed consent to the data processing can be overruled, thus the data subject can withdraw his consent based on the provisions of this regulation.

In the event of an application to a job that has not been advertised, the Company provides the applicant with an electronic feedback only, in which information is given about the fact, legal basis, as well as of the forms of objection to the data processing.

The Company splits the CV's received into separate categories for later use – this applies even if the CV is received as an application for a specific position advertised. Since such information is available to everyone interested, by sending his CV to a member company of the group, the applicant consents to the data processing as per this provision. The database is managed by the four subsidiaries as joint data controllers, all four subsidiaries being entitled to enter data into the database. The database is shared by them. Should the data subject not wish that the Company process his data in the future, within the deadline as set forth herein, he is required to indicate this



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simultaneously with sending the CV or shall have to later withdraw his consent granted by sending the CV. (Since these rules are available to the parties involved prior to sending the CV as well, the prior information in this regard is considered granted and consent is deemed voluntary.)

purpose of data processing: selection of suitable future employees to fill vacant positions, by building a non-public employee database for internal use.

data processed: name, date of birth, mother's name, address, qualifications, photograph, other data provided by the subject.

legal basis for the data processing: consent of the data subject according to data protection laws.

term of data storage: 4 years from the time the data is entered.

method of data storage: on paper and electronically.

5. Service provider for the website server

T-Systems Magyarország Zrt.
seat: 1117 Budapest, Budafoki út 56.
Corporate Reg. No.: Cg.01-10-044852

6. Matters not regulated in this notice

Matters not regulated in this notice shall be governed by the provisions of data protection laws.