

**DATA PROTECTION REVIEW**

For the Partners of Interim Ltd.

**(Annex No.2 of Data Protection Rules)**

Valid as of 25.05.2018.

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## 1. Details of data manager

Name of data manager: **Interim Ltd.**

Registered address: 1122 Budapest, Ráth György utca 56.

Company registration No.: 01-09-922757

Represented by Fekete István, Lengyel Péter, Steiner László

Telephone: +3613935800

Email: Backoffice@interim.hu

Website: [www.interim.hu](http://www.interim.hu)

Person responsible for data management: Péter Dávid

## 2. Aim of review

The aim of this data protection review is to provide information to stakeholders about the handling of their personal data in an understandable and clear way.

Data handling is not one of our main spheres of activity, but we still pay special attention to the relevant regulation of the European Union and Hungary. Special focus is directed to 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 revoking Directive 95/46/EC (General Data Protection Regulation) and to Hungarian Law CXII of 2011 „About the self-determination of information rights and the freedom of information”.

As for our professional activity, we are providing interim management services.

## 3. General purpose of data handling

To contract our clients, partners, fulfill the contracts, issue accountable invoices.

## 4. Managed data

4.1 Data of partners

4.1.1 Contractual relations

**Relevance:** all natural persons representing the other party in the contracts as representative or relationship manager

**Aim of data handling:** to contract and fulfill it

Activity	Type of data	Legality	Aim	Storage period
conclude contract	name	lawful interest	to conclude and fulfill contract (identification, contact keeping)	5+1 years
	e-mail address			
	telephone			

**Process of data handling:**

The data received from our partner during the contract preparation are used and managed in the contracted period exclusively for fulfilling the contract and keeping contacts.

Provision of data is not compulsory in any of the cases; however, the identification of personal data of representatives or relationship managers is indispensable condition of the contract.

Data can be forwarded to relevant authorities (Tax and Customs) when reviewing the participating organizations, or to competitive bidding and procurement advisors.

4.1.2 Contracts with private individuals

**Relevance:** all natural persons as contracted partners

**Aim of data handling:** to contract and fulfill it

Activity	Type of data	Legality	Aim	Storage period
Contracts with natural persons (commissioning, entrepreneurship, services)	name	lawful interest	to conclude and fulfill contract (identification, invoicing, social security handling, contact keeping, payment)	5+1 years
	mother's maiden name			
	place of birth			
	date of birth			
	address			
	tax identification no.			
	social insurance no			
	personal id no.			
	e-mail address			
	telephone			
bank account no.				

**Process of data handling:**

The data received from the private person during the contract preparation are used and managed in the contracted period exclusively for fulfilling the contract and keeping contacts.

Provision of data is not compulsory in any of the cases; however, the identification of personal data of representatives or relationship managers is indispensable condition of the contract.

Data can be forwarded to relevant authorities (Tax and Customs) when reviewing the participating organizations, or to competitive bidding and procurement advisors.

#### 4.1.3 Contracts with private entrepreneurs

**Relevance:** all private entrepreneurs as contracted partners

**Aim of data handling:** to contract and fulfill it

Activity	Type of data	Legality	Aim	Storage period
<b>Contracts with private entrepreneurs</b>	name	lawful interest	to conclude and fulfill contract (identification, contact keeping, payment)	5+1 years
	entrepreneur id no.			
	email address			
	telephone			
	bank account no.			

#### **Process of data handling:**

The received from the private entrepreneur during the contract preparation data are used and managed in the contracted period exclusively for fulfilling the contract and keeping contacts.

Provision of data is not compulsory in any of the cases; however the identification of personal data of representatives or relationship managers is indispensable condition of the contract.

Data can be forwarded to relevant authorities (Tax and Customs) when reviewing the participating organizations, or to competitive bidding and procurement advisors.

#### 4.1.4 Invoicing

**Relevance:** all private entrepreneurs or private individuals as contracted partners

**Aim of data handling:** handling of invoice according to Law on accounting

Activity	Type of data	Legality	Aim	Storage period
invoicing	name	fulfillment of legal obligation	handling of invoice according to Law on accounting (identification)	8 years

**Process of data handling:**

In case of private entrepreneurs and private persons the invoices (may) contain personal data. Those invoices are stored for 8 years according to stipulations of the relevant Law on accounting.

Provision of data is compulsory according to relevant laws. In case of missing data the invoice cannot be issued.

Data are forwarded to our accountant partner and in case of review to the competent authority (Tax and Customs)

4.1.5 Supplier list

**Relevance:** private individuals representing suppliers or their contact persons

**Aim of data handling:** make contact keeping easier

Activity	Type of data	Legality	Aim	Storage period
suppliers list	name	lawful interest	make contact keeping easier (identification)	till the end of contractual relation
	telephone			
	e-mail address			

**Process of data handling:**

We register contact data of contact persons of our constant partners, suppliers in order to reach them easily. We keep data on paper and electronically. Data are not forwarded to third parties.

4.2 Data handling in connection with professional activity (Provision of interim management services)

4.2.1 Registration

**Relevance:** private individuals willing to become interim managers

**Aim of data handling:** registration

Activity	Type of data	Legality	Aim	Storage period
registration	name	consent	contact keeping, possibility to sign in to the website	till withdrawal of consent (renewal and data check)
	telephone			
	e-mail address			

			(identification, verification)	in every 3 years)
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**Process of data handling:**

Before creating their profile, those wishing to work as interim managers are registering on the website, receiving their own password enabling them to sign in.

These data are not forwarded.

#### 4.2.2 Registration on the website (creating user profile)

**Relevance:** private individuals willing to become interim managers and their reference persons

**Aim of data handling:** registration on the website (creating user profile)

Activity	Type of data	Legality	Aim	Storage period
<b>registration on the website</b>	name	consent	To collect available information of the applicant in order the data manager could offer the professionally relevant person to requests for proposals (decide fulfillment of requirements)	till withdrawal of consent (renewal and data check in every 3 years)
	scientific degree			
	citizenship			
	place of birth			
	date of birth			
	address			
	telephone no.			
	e-mail address			
	LinkedIn id			
	skype id			
	membership in professional organizations			
	other data provided by the applicant			
	degrees of studies	lawful interest		
	former employments			
	data of contact persons at former employment (telephone no., e-mail address)			
Data of reference person: name employer telephone title e-mail address relation/common work				

**Process of data handling:**

The applicants are enabling the data manager to know their professional profile as full as possible by filling the questionnaire in the database and by loading documents (CV, references, letters of recommendation). By supplying the LinkedIn id the data manager is enabled to learn the applicant's LinkedIn profile and to take over data into its data base.

Parts of the above data are forwarded to clients upon request. (4.14)

#### 4.2.3 Signing in to the website

**Relevance:** applicants registered on the website

**Aim of data handling:** signing in to the website

Activity	Type of data	Legality	Aim	Storage period
sign in to website	password	consent	signing in to website, ensuring checking of own data (identification, verification)	15 minutes at signing in, and storage in data base as long as the profile is available
	e-mail address			

**Process of data handling:**

Data required for signing in (and afterward for checking their own data) are stored in our data base developed by us.

#### 4.2.4 Data base of managers

**Relevance:** applicants to become interim managers and candidates added by Interim Ltd.

**Aim of data handling:** data base management

Activity	Type of data	Legality	Aim	Storage period
managers' registry	data provided during registration and in loaded documents	consent	Professional evaluation of applicants, summary of experiences (identification, decision on fulfillment of requirements)	till withdrawal of consent (renewal and data check in every 3 years)
	professional evaluation			
	opinions			

**Process of data handling:**

The interim manager applicants are in a separate file in data base or our own development. Further to data mentioned in point 4.2.2 in this file are: professional evaluation, opinions, reflections, and other information on them.

#### 4.2.5 Request for proposal



**Relevance:** contact person at client requesting proposal.

**Aim of data handling:** keep contact in order to present proposal

Activity	Type of data	Legality	Aim	Storage period
Request for proposal	name	lawful interest	keep contact in order to present proposal (verification)	5 years following the latest activity
	telephone			
	e-mail address			

**Process of data handling:**

We register personal data of contact persons from the client requesting a proposal in the data base and use them exclusively for keeping contacts.

Data are forwarded to the selected interim manager.

#### 4.2.6 Data base of clients and contact persons

**Relevance:** contact person at client requesting proposal (through the website or in other way).

**Aim of data handling:** keep contact in order to present proposal

Activity	Type of data	Legality	Aim	Storage period
Data base of clients	Data of employed here person: name title telephone e-mail address	lawful interest	keep contact in order to present proposal (verification)	5 years following the latest activity
	Data of earlier employed here person: name title telephone e-mail address			
Data base of contact persons	name of contact person	lawful interest	keep contact in order to present proposal (verification, used language, registering experiences)	5 years following the latest activity
	title			
	job			
	private cellular no.			
	private telephone			
	private e-mail address			
	languages opinions			
Data base of	name (not always	lawful interest	keep contact in order	till withdrawal of

<b>projects</b>	the same as the contact person)		to present proposal (verification)	consent but not longer than 5 years following the latest activity
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**Process of data handling:**

We register personal data of contact persons from the client requesting a proposal in the data base and use them exclusively for keeping contacts.

These data are not forwarded.

4.2.7 Assessment report

**Relevance:** candidate interim manager

**Aim of data handling:** to present proposal

Activity	Type of data	Legality	Aim	Storage period
<b>Assessment report</b>	name	consent	Presentation of proposal (identification, decision on fulfillment of requirements)	till withdrawal of consent but not longer than 5 years following the latest activity
	citizenship			
	age			
	languages			
	studies			
	work experiences			
	summary opinion (professional capacities, management skills)			

**Process of data handling:**

In the Assessment report the data manager summarizes the most important information for the client requesting a proposal that is worth to know about the candidate interim manager. The document contains personal data on top of professional characterization.

These data are forwarded to the client requesting a proposal, and this fact and the name of the client is always advised beforehand to the candidate.

4.2.8 Users list

**Relevance:** users of data base

**Aim of data handling:** keeping track of authorized users of the data base

Activity	Type of data	Legality	Aim	Storage period
<b>Users list</b>	name	lawful interest	keep track of	1 month

	identification		authorized users of the data base (identification)	following withdrawal of authorization
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**Process of data handling:**

There is a list of authorized users in the data manager's own developed data base.

These data are not forwarded.

**5. Data security**

Security of personal data managed by us is achieved by applying technical and organizational rules and processes.

Data are secured with relevant rules against illegal access, modification, forwarding, publication, deletion or destruction and against annihilation or damage by chance and against not accessibility due to changes in applied technics.

Personal data are accessible only by those colleagues who need them in order to fulfill their duties.

In order to achieve data security:

- during the design and operation of the IT system we measure and take into consideration the possible risks while continuously mitigating them
- we are aware of possible threats and vulnerabilities (e.g. computer viruses, cyber-attacks, attacks to prohibit us to provide services, etc.) in order to be prepared and defended to avoid them
- both IT devices and paper based information are defended against illegal physical access and against environmental effects (e.g. water, fire, excess voltage)
- ensuring proper control over the IT system we can identify the possible problems and events
- we pay special attention to the training and IT awareness of our colleagues
- when selecting service providers for system management the basic criteria is reliability

**6. Forwarding data**

The personal data of our contractual partners – safe exemptions as above – are not forwarded to other data managers. Data can be forwarded in case of requests from authorities (e.g. tax review) or in some cases it can be necessary in order to fulfill our contractual duties (e.g. in case of cooperation with competitive bidding and procurement advisors). In case it stretches the limit of original data

management aims, the data will be forwarded to any third person with the definite consent of the relevant person.

In our invoicing we use the data processor T.T.D. Bt, as our outsourced accounting partner. Part of our contract with them is our agreement on data processing according to which, when processing data, they apply the same attention, obey all the relevant laws and act only on our instructions.

Information concerning data forwarding is contained in point 4. in detail.

## 7. Stakeholders' rights

All relevant parties have the right

- to receive *information* on processing of his/her data beforehand
- to *access* all information concerning processing of his/her data
- to request *modification* of his/her faulty, not exact, not full data
- to request *deletion* (forgetting) his/her personal data
- to request *limitation* to data processing
- to *protest* against the use of his/her data in certain cases, e.g. marketing
- to *enter into legal action* against data management

The relevant parties can exercise their rights by contacting us on any of the below described possible ways, in writing or in person at point in time agreed beforehand. We seek to answer each request within the shortest possible time, but not later than 15 working days.

To contact us in order to exercise your rights:

- Letter by post: 1122 Budapest, Ráth György utca 56.
- By e-mail: [backoffice@interim.hu](mailto:backoffice@interim.hu)
- In person: time to be agreed on the phone no. + 36 1 393 5800

We cannot provide information on personal data on the phone as we are not able to identify the calling side.

In case infringements of rights you can turn to the National Authority of Data Protection and Freedom of Information.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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