
PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA OF JOB APPLICANTS

1. Purpose and Scope of this Notice

This Privacy Notice provides information on how the personal data of natural persons applying for positions advertised by **Turbine Hálózatelemző Kutatási Fejlesztési Korlátolt Felelősségű Társaság** (registered office: 1083 Budapest, Szigony utca 26–32. A. lház. 2. em., Hungary – hereinafter: “**Turbine Kft.**”) is processed in the course of recruitment activities. In certain cases, applications may be jointly reviewed or managed with Turbine Kft.’s UK-based parent company, Turbine Simulated Cell Technologies Ltd. (registered office: 2 London Wall Place, 6th floor, London, United Kingdom). Unless otherwise indicated, Turbine Kft. acts as the primary data controller.

The purpose of this Notice is to provide transparent and detailed information on how your personal data is processed throughout the recruitment process. This includes, in particular, what categories of data we process, the purposes and legal bases of the processing, how long we retain the data, who may have access to it, rules on data transfers, the security measures in place, as well as your rights under applicable data protection law and how you may exercise them.

This Notice applies solely to processing operations related to job applications. Other data processing activities carried out by Turbine are subject to separate privacy notices.

If your application involves both Turbine Kft. and its parent company in the United Kingdom, those entities may jointly determine the purposes and means of processing, in line with a coordinated recruitment process. In such cases, the entities involved will cooperate to ensure that data protection obligations are met, and your rights as a data subject are upheld.

For the effective exercise of your rights, we kindly request that you address your data protection-related requests primarily to Turbine Kft. However, you may also contact Turbine Simulated Cell Technologies Ltd., where applicable – doing so will not disadvantage you in any way. Further details, including contact information, are available in Section 12 of this Notice.

2. Who Does This Privacy Notice Apply To?

This Privacy Notice applies to all natural persons who apply for a position at Turbine Kft., whether by submitting a CV, filling out an online application form, or otherwise expressing interest in a job opportunity. It also covers those applicants whose data is received by Turbine from third parties, such as recruitment agencies or publicly available professional platforms (e.g., LinkedIn).

In case a specific position involves joint processing with Turbine Simulated Cell Technologies Ltd. (the parent company based in the UK), this Notice will also apply to data processing operations carried out in collaboration with that entity.

3. What Personal Data Does Turbine Process During Recruitment?

Turbine may process the following categories of personal data in the course of evaluating job applications:

- **Basic personal data**, such as your name, place and date of birth, and contact details including your address, phone number, and email address.
- **Data included in your CV and cover letter**, such as details of your educational background, qualifications, training, internships, current and previous employment (including content, duration, and reasons for

termination), references, and any other information voluntarily shared by you (e.g. photo, motivation, personal interests).

- **Additional information provided via the application form**, including links to any online profiles you choose to share (e.g. LinkedIn or a personal website).
- **Notes recorded during the selection process**, including assessments and observations made during interviews, to the extent that they are relevant for the hiring decision.
- **Publicly available online information**, but only if you explicitly share it with Turbine as part of your application (e.g. submitting a link to an online profile). Such data will be used exclusively for assessing your suitability for the role.
- **Any other information voluntarily shared by you during the application or interview process**, whether verbally or in writing (e.g. via email, or as part of additional documentation).

In most cases, Turbine receives personal data directly from you when you submit your application through our recruitment platform or by email. Additionally, we may receive your data via third-party recruitment or HR software providers (such as BambooHR), depending on how you submit your application. In such cases, Turbine processes only the data necessary for evaluating your application, as made available through the platform, and in line with this Privacy Notice.

Please note that these third-party platforms may also act as separate data controllers and process your personal data under their own privacy policies. For example, if you submit your application via BambooHR, their privacy notice applies in addition to this one.

Important: Turbine does not request or intend to process any special categories of personal data (such as information revealing racial or ethnic origin, religious or philosophical beliefs, sexual orientation, or trade union membership). Please do not include such information in your application. If such data is nonetheless submitted, Turbine will take steps to promptly delete it.

4. How Does Turbine Collect Personal Data?

Turbine only processes personal data that you voluntarily and directly provide during the application process. You are responsible for ensuring that the information you submit during the selection process is accurate, truthful, and up to date.

If any of your personal data changes or needs correction, please inform us by contacting hr@turbine.ai (or the relevant contact provided in the job posting).

Providing personal data is voluntary. However, certain data is essential in order for Turbine to evaluate your application. If you choose not to provide the necessary information, we will not be able to include you in the recruitment process.

5. Legal Bases for Processing Your Personal Data

Turbine processes your personal data in accordance with the General Data Protection Regulation (GDPR) and ensures that each processing activity is based on an appropriate legal ground. In connection with your job application, we may rely on the following legal bases:

- **Taking steps prior to entering into a contract (Article 6(1)(b) GDPR)**
We process your personal data in order to take steps at your request prior to entering into an employment or other work-related contract. This includes assessing your suitability for the advertised role or other

positions that may match your profile, and conducting the full recruitment process until a final decision is made.

- **Your consent (Article 6(1)(a) GDPR)**

If you have explicitly consented during the application process, we may retain your data even if your application is unsuccessful, in order to contact you about future job opportunities.

You may withdraw your consent at any time by contacting us at hr@turbine.ai. The withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal. Providing consent is entirely voluntary and has no impact on the evaluation of your current application.

- **Legitimate interest (Article 6(1)(f) GDPR)**

In certain cases, Turbine may process personal data based on its legitimate interests to ensure an efficient, fair, and transparent recruitment process. This may include improving recruitment procedures, detecting misuse of the application system, and ensuring the integrity of the process. We always conduct a balancing test to ensure that such processing does not override your fundamental rights and freedoms.

After the recruitment process concludes, we may continue to retain certain data where necessary for the establishment, exercise, or defence of legal claims. For example, in the event of a discrimination complaint, Turbine may lawfully retain the relevant data for dispute resolution purposes.

- **Compliance with legal obligations (Article 6(1)(c) GDPR)**

In some cases, we may be required to process your personal data in order to comply with legal obligations, such as employment, tax, or equal opportunity regulations, which may require us to retain certain data or disclose it to competent authorities.

6. Purposes of Processing Personal Data

Turbine processes the personal data you provide during the application process – as well as other information referenced in this notice – for the following purposes:

- **Managing your application and assessing your suitability for the position you applied for** (or other relevant roles, where applicable), including verifying the information you provided and making employment-related decisions.
- **Maintaining contact with you during the recruitment process**, including status updates about your application and, where appropriate, providing individual feedback.
- **Conducting background checks where permitted by applicable law and where necessary for the position in question**. In such cases, you will receive prior notice about the purpose, legal basis, and scope of the background check.
- **Maintaining recruitment records** in accordance with legal obligations, equal opportunity principles, and Turbine's internal HR policies.
- **Handling legal claims and ensuring legal protection**, for example in the event of a discrimination complaint or other legal dispute arising from the recruitment process, by retaining and processing relevant data as needed.

The processing activities described above are carried out on the legal bases set out in Section 5 of this notice – in particular, taking steps prior to entering into a contract, compliance with legal obligations, and Turbine's legitimate interests.

If you have provided your explicit consent, Turbine may also retain your personal data after an unsuccessful application in order to contact you about future opportunities that may match your profile. You may withdraw your consent at any time without affecting the lawfulness of processing carried out before the withdrawal.

7. Data Transfers and Recipients of Personal Data

a) Who may access your personal data?

Turbine only shares your personal data with the following categories of recipients, and solely for the purposes described in this Notice:

- **External service providers (data processors):**

Turbine engages external service providers to support its recruitment and HR processes. These may include providers of recruitment platforms, communication or IT systems. These processors act under Turbine's instructions and are contractually bound to process personal data in compliance with the GDPR.

Turbine currently uses the following types of service providers:

- online recruitment platforms and job portals (e.g. LinkedIn, [Turbine's webpage](#) by Bamboo),
- headhunting and recruitment agencies,
- cloud-based HR management systems such as BambooHR ([Privacy Policy](#)).

The list of currently active providers may evolve as the recruitment system develops, but Turbine ensures that any provider is engaged only after verifying their data protection and contractual safeguards. You can request an up-to-date list of processors by contacting Turbine at hr@turbine.ai.

- **Authorities:**

Your personal data may be disclosed to public authorities, courts or regulators if Turbine is legally required to do so (e.g. for compliance with employment or anti-discrimination laws).

- **Turbine corporate group entities:**

If applicable, Turbine may share your application data with its UK-based parent company, Turbine Simulated Cell Technologies Ltd., solely for internal coordination and recruitment management purposes. Such sharing occurs under joint controllership and within a framework that respects your rights under the GDPR.

b) International data transfers

Turbine may transfer your personal data outside the European Economic Area (EEA), including to the United Kingdom and the United States, in the following cases:

- to its parent company in the United Kingdom, covered by the European Commission's adequacy decision for the UK;
- to service providers such as BambooHR, based in the United States. In such cases, data transfers are safeguarded by the Standard Contractual Clauses (SCCs) approved by the European Commission, and where appropriate, additional contractual and technical measures.

Turbine ensures that any international transfer of your data is carried out in full compliance with Chapter V of the GDPR and that appropriate safeguards are always in place. Further information on these safeguards is available upon request.

8. Automated decision-making

Turbine does not engage in any form of decision-making that is solely based on automated processing (i.e. without any human involvement), which would produce legal effects concerning you or similarly significantly affect you — such as rejection of your application or refusal to enter into a contract.

Furthermore, Turbine does not perform profiling during the recruitment process that would involve the automated assessment of your abilities, preferences, or reliability for evaluation purposes.

9. Data retention periods

Turbine retains your personal data only for as long as necessary to fulfil the original purpose of processing. Once the purpose has been achieved, your personal data will be deleted or anonymised, unless further retention is legally justified, particularly in the following cases:

- **Unsuccessful application:** If your application does not result in the establishment of an employment or other working relationship, your personal data will be deleted without undue delay after the conclusion of the recruitment process for the given position – unless another legal basis (e.g. legal obligation or consent to future job opportunities) justifies continued retention.
- **Compliance with legal obligations:** If applicable laws – especially labour, tax or other statutory requirements – mandate it, certain personal data must be retained for the duration prescribed by law.
- **Establishment, exercise or defence of legal claims (based on legitimate interest):** If necessary to establish, exercise or defend legal claims (e.g. in the event of a complaint related to the recruitment process), data may be retained based on Turbine's legitimate interest under Article 6(1)(f) of the GDPR. In such cases, data may be stored until the conclusion of any legal proceedings and for the duration of any applicable limitation period.
- **Future job opportunities (with explicit consent):** If you have explicitly consented to being considered for future roles, your personal data will be retained for up to 3 (three) years following the conclusion of the current recruitment process. You may withdraw your consent at any time by contacting us; in this case, we will delete your data unless another legal basis requires further retention.

Once the applicable retention period has expired, your personal data will be securely deleted, unless further storage is expressly required by law.

10. Your Rights

As a job applicant, you have the following rights in relation to the processing of your personal data:

While Turbine Kft. and its parent company, Turbine Simulated Cell Technologies Ltd., may act as joint controllers in the recruitment process, your rights are primarily exercised with the Turbine entity to which you submitted your application.

- **Right of access** – You have the right to request information about the personal data we process about you and to obtain access to such data.
- **Right to rectification** – You have the right to request the correction or completion of any inaccurate or incomplete personal data concerning you.
- **Right to erasure (“right to be forgotten”)** – You may request the deletion of your personal data if the legal basis for processing no longer applies or if the data is no longer necessary for the original purpose.
- **Right to restriction of processing** – In certain cases (e.g. where accuracy is contested or processing is unlawful), you may request that the processing of your data be restricted.
- **Right to data portability** – Where processing is based on your consent or on a contract, and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used, machine-readable format and to transmit that data to another controller.

- **Right to object** – You may object to the processing of your personal data if it is based on legitimate interest. In such cases, Turbine will stop processing your data unless it can demonstrate compelling legitimate grounds for the processing or if the data is necessary for the establishment, exercise, or defence of legal claims.
- **Right to withdraw consent** – If the processing of your data is based on your consent, you may withdraw that consent at any time. The withdrawal does not affect the lawfulness of processing carried out before the withdrawal.
- **Right to lodge a complaint and seek judicial remedy** – If you believe your data has been processed in violation of the GDPR or applicable national data protection laws, you have the right to lodge a complaint with a supervisory authority – particularly in the EU/EEA country where you live, work, or where the alleged infringement took place. In Hungary, the competent authority is the National Authority for Data Protection and Freedom of Information (NAIH) (address: 1055 Budapest, Falk Miksa utca 9–11.; email: ugyfelszolgalat@naih.hu; website: <https://naih.hu>).

Under Article 79 of the GDPR and relevant national law, you also have the right to seek judicial remedy before the competent courts, including the court of your place of residence.

If you reside in the European Economic Area (EEA) and wish to exercise any of the rights listed above, please submit your request to: hr@turbine.ai.

11. Data Security

Turbine implements appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, and accidental or unlawful destruction or loss.

We maintain data security throughout the entire lifecycle of the data – from collection to deletion – by applying secure processes and technologies. The confidentiality, integrity, and availability of personal data are treated as fundamental principles in all aspects of our data processing.

We only share personal data with third parties that have contractually committed to complying with the data security requirements under the GDPR or that have demonstrably implemented adequate safeguards to protect personal data.

12. Data Controllers and Contact Information

In connection with the recruitment process, **Turbine Kft.** and its parent company, **Turbine Simulated Cell Technologies Ltd.**, act as **joint controllers** of your personal data. This means that both entities jointly determine the purposes and means of processing in order to ensure a consistent and high-quality recruitment and HR practice.

Turbine Kft. primarily manages the recruitment process and serves as the **main point of contact** for all privacy-related matters. Therefore, we recommend that you submit any requests concerning your data protection rights directly to Turbine Kft. However, you may also exercise your rights with respect to either controller without disadvantage.

The joint controllers are:

- **Turbine Kft.**
1083 Budapest, Szigony utca 26–32. A. lház. 2. em., Hungary
Email: hr@turbine.ai

- **Turbine Simulated Cell Technologies Ltd.**
6th Floor, 2 London Wall Place, London, EC2Y 5AU, United Kingdom
Email: hr@turbine.ai

If you have any questions about this Privacy Notice or the way your personal data is processed, you are welcome to contact us via the email addresses provided above.

13. Changes to this Privacy Notice

Turbine reserves the right to unilaterally amend this Privacy Notice.

Any changes will be published on our website at www.turbine.ai. If the amendments significantly affect the way your personal data is processed, we will provide additional notice on our website.

The most recent version of this Privacy Notice will always indicate the date of last update at the bottom of the document. We recommend that you periodically review our website to stay informed of any updates.

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