

DATA PROTECTION NOTICE

Last modified: 27 August 2025

Progressive BEX Kft. (hereinafter: **Data Controller** or **Progressive Advertising Agency**) hereby provides the following information (hereinafter: Notice) regarding the processing of personal data of data subjects, as well as their data protection rights and legal remedies. The Data Controller undertakes that all data processing related to its activities complies with the requirements set out in this Notice and in the applicable legislation, including the requirements of Regulation (EU) 2016/679 (hereinafter: GDPR).

This Notice is continuously available at www.progressive.hu/adatvedelem.

Progressive Advertising Agency reserves the right to amend this Notice at any time and will duly notify data subjects of any changes in a timely manner.

If you have any questions regarding this Notice, please contact us at any of the contact details below.

Progressive Advertising Agency is committed to protecting the personal data of data subjects affected by its data processing activities and considers it of paramount importance to respect the right of its clients to informational self-determination. Progressive Advertising Agency treats personal data confidentially and takes all security, technical and organisational measures necessary to guarantee the security of the data.

1. DATA CONTROLLER DETAILS

- Company name: Progressive Bex Kft.
- Address: 1118 Budapest, Ménézi út 22.
- Contact person: Bálint Buzási
- E-mail address: info@progressive.hu
- Company registration number: 01 09 325966

This Notice has been prepared on the basis of the following applicable legislation:

1. Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Info Act);
2. Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (E-Commerce Act);
3. Act XLVIII of 2008 on the Basic Conditions and Certain Limitations of Commercial Advertising Activities (Advertising Act);
4. Act C of 2003 on Electronic Communications (Electronic Communications Act);
5. Act CXIX of 1995 on the Processing of Name and Address Data for Research and Direct Marketing Purposes;
6. Regulation (EU) 2016/679 of 27 April 2016 (GDPR).

The Data Controller undertakes to comply with this Notice and requests that visitors to its website and career page (<https://progressive.hu/hu/karrier/>) and users applying for advertised positions review this Notice before providing their personal data. Amendments to this Notice shall take effect upon publication at <https://progressive.hu/>.

Technical data:

Progressive Advertising Agency selects and operates IT tools so that the processed data:

- is accessible to authorised persons (availability);
- its authenticity and authentication is ensured (authenticity of data processing);

- its integrity can be verified (data integrity);
- is protected against unauthorised access (data confidentiality).

Progressive Advertising Agency protects data with appropriate measures against unauthorised access, alteration, transmission, publication, erasure or destruction, as well as accidental destruction. It takes appropriate technical, organisational and structural measures providing a level of protection commensurate with the risks.

During data processing, Progressive Advertising Agency preserves:

- confidentiality: protects information so that only authorised persons may access it;
- integrity: protects the accuracy and completeness of information and the processing method;
- availability: ensures that authorised users can access the information when needed.

2. DEFINITIONS

The terms used in this Notice shall have the following meanings:

data subject: any natural person identified or – directly or indirectly – identifiable on the basis of specific personal data;

personal data: any data that can be associated with the data subject – in particular the data subject's name, identifying sign, as well as one or more characteristics specific to their physical, physiological, mental, economic, cultural or social identity – as well as any conclusion drawn from the data relating to the data subject;

consent: a voluntary and definite expression of the data subject's will, based on adequate information, by which the data subject gives unambiguous agreement to the processing of personal data relating to them;

objection: a statement by the data subject objecting to the processing of their personal data and requesting the cessation of the processing or the erasure of the processed data;

data controller: the natural or legal person, or organisation without legal personality, who or which alone or jointly with others determines the purpose of the processing of data, makes and implements decisions regarding the processing, or has them implemented by a data processor;

data processing (as an activity): any operation or set of operations performed on data, regardless of the procedure applied, including but not limited to collection, recording, organisation, storage, alteration, use, querying, transmission, publication, harmonisation, blocking, erasure and destruction, as well as prevention of further use, taking of photographs, audio or video recordings, and recording of physical characteristics suitable for identification;

data transfer: making data accessible to a specified third party;

publication: making data accessible to anyone;

data erasure: rendering data unrecognisable in such a way that its recovery is no longer possible;

data marking: providing data with an identifying mark for the purpose of distinguishing it;

data blocking: providing data with an identifying mark for the purpose of permanently or temporarily restricting its further processing;

data destruction: the complete physical destruction of the data carrier containing the data;

data processing (technical): the performance of technical tasks related to data processing operations, regardless of the method and tools used and the place of application, provided that the technical task is performed on the data;

data processor: any natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller;

data set: the entirety of data processed in a single register;

third party: any natural or legal person, or organisation without legal personality, not identical with the data subject, the data controller or the data processor;

data protection incident: the unlawful processing of personal data, in particular unauthorised access, alteration, transmission, publication, erasure or destruction, as well as accidental destruction and damage.

3. LEGAL BACKGROUND, LEGAL BASIS, PURPOSE, SCOPE OF DATA AND RETENTION PERIOD OF DATA PROCESSING ON THE WEBSITE

Visiting the website is accomplished by clicking on the Progressive Advertising Agency's website at <https://progressive.hu/> or its sub-pages (e.g. the career page).

3.1 Information on the use of cookies

The Data Controller uses so-called cookies during visits to the website. A cookie is an information package consisting of letters and numbers that the Data Controller's website sends to the browsers of website visitors in order to save certain settings, facilitate the use of the website, and assist the Data Controller in collecting certain relevant statistical information about the website's visitors.

The legal framework for data processing related to cookies is provided by the GDPR, the Info Act (Act CXII of 2011), the Electronic Communications Act (Act C of 2003), and the E-Commerce Act (Act CVIII of 2001).

If you do not accept the use of cookies, consent-based cookies will not be applied. You may also delete cookies later or withdraw your consent by changing the cookie settings on the website, and you may also delete cookies through your browser settings.

What cookies do we use?

The Progressive Advertising Agency website uses cookies (small files consisting of letters and numbers stored in the visitor's browser or on the computer's hard drive) for the proper operation of the website and for the following purposes.

The following types of cookies are used during the operation of the website:

Functional cookies: These cookies are used in connection with the use of the website and its functions. Unless otherwise stated, these cookies are deleted at the end of the session, except for the language setting cookie, which has the lifetime specified below.

You may refuse or disable the use of these cookies by modifying your browser's cookie function. However, if you refuse or disable these cookies, the website may not display properly or you may not be able to use all of its functions, as these cookies may be linked to the operation of certain website functions.

The legal basis for these cookies is typically the consent of the data subject (Article 6(1)(a) GDPR), or in the case of the language setting cookie indicated below, the legitimate interest of the Data Controller (Article 6(1)(f) GDPR), which is the proper operation of the website.

Advertising cookies: These cookies collect data about data subjects for advertising purposes. The legal basis for these cookies is the consent of the data subject (Article 6(1)(a) GDPR).

a) Functional cookies

Cookie name	Function and data scope	Legal basis	Lifetime
pll_language Domain: progressive.hu	Remembers the user's selected language when returning to the website and retrieves language information if not available otherwise.	Legitimate interest of the Data Controller (Art. 6(1)(f) GDPR) – proper operation of the website	1 year

ytidb::LAST_RESULT_ENTRY_KEY Domain: youtube.com	Used by YouTube to store the last search result entry clicked by the user, to improve user experience with more relevant search results.	Consent of the data subject (Art. 6(1)(a) GDPR)	Never expires
yt-player-headers-readable Domain: youtube.com	Used by YouTube to store user settings related to video playback and the player interface.	Consent (Art. 6(1)(a) GDPR)	Never expires
yt-player-bandwidth Domain: youtube.com	Stores the user's video player preferences and settings, particularly regarding bandwidth and YouTube streaming quality.	Consent (Art. 6(1)(a) GDPR)	Never expires
yt-remote-device-id Domain: youtube.com	YouTube uses this cookie to store the user's video settings for embedded YouTube videos.	Consent (Art. 6(1)(a) GDPR)	Never expires
yt-remote-connected-devices Domain: youtube.com	YouTube uses this cookie to store the user's video settings for embedded YouTube videos.	Consent (Art. 6(1)(a) GDPR)	Never expires
yt-remote-session-app Domain: youtube.com	Used by YouTube to store user settings and information related to the embedded YouTube video player interface.	Consent (Art. 6(1)(a) GDPR)	End of session
yt-remote-cast-installed Domain: youtube.com	Stores the user's video player preferences for embedded YouTube videos.	Consent (Art. 6(1)(a) GDPR)	End of session
yt-remote-session-name Domain: youtube.com	Used by YouTube to store the video player settings of users using embedded YouTube videos.	Consent (Art. 6(1)(a) GDPR)	End of session
yt-remote-cast-available Domain: youtube.com	Stores user preferences regarding whether casting is available on the YouTube video player.	Consent (Art. 6(1)(a) GDPR)	End of session
yt-remote-fast-check-period Domain: youtube.com	Used by YouTube to store the video player settings of embedded YouTube videos.	Consent (Art. 6(1)(a) GDPR)	End of session

b) Advertising cookies

Cookie name	Function and data scope	Legal basis	Lifetime
YSC Domain: youtube.com	YouTube uses this cookie to track views of embedded videos on YouTube pages.	Consent (Art. 6(1)(a) GDPR)	End of session
VISITOR_INFO1_LIVE Domain: youtube.com	YouTube uses this cookie to measure bandwidth and determine whether the user gets the new or old player interface.	Consent (Art. 6(1)(a) GDPR)	6 months
VISITOR_PRIVACY_METADATA Domain: youtube.com	YouTube sets this cookie to store the user's cookie consent status for the current domain.	Consent (Art. 6(1)(a) GDPR)	6 months
PREF Domain: youtube.com	The PREF cookie is set by YouTube to store user settings such as language, search result format and other customisations for embedded YouTube videos across different websites.	Consent (Art. 6(1)(a) GDPR)	8 months

You may disable cookies through your web browser settings. However, if you disable all cookies in your browser (including functional cookies), you may not be able to access or use certain functions of our website properly.

Within the EU, the additional data controller for Google services is: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

We draw the attention of our visitors to the fact that when using an ad-blocker, the cookie consent notice may not always appear. If you wish to view it, please deactivate the ad-blocking application.

3.2. Data processed during applications on the career page

Legal basis of data processing	The legal basis is the performance of pre-contractual steps at the request of the data subject in accordance with Article 6(1)(b) of the GDPR. In addition, the applicant's application data and CV may be processed on the basis of consent (Article 6(1)(a) GDPR), or for the defence of the Data Controller on the basis of its legitimate interest (Article 6(1)(f) GDPR). It is emphasised that if the data subject's data may be retained by Progressive Advertising Agency for the purpose of sending further enquiries, informational letters and information about relevant positions will be sent to data subjects during the retention period.
Purpose of data processing	Progressive Advertising Agency processes personal data of those who complete the application form on the career page for the purpose of job searching, establishing contact and maintaining communication. Where the applicant's data and CV are retained on the basis of consent, the purpose is also the efficient filling of positions in the event of future vacancies. In the case of processing based on the legitimate interest of the Data Controller, the purpose is defence in connection with data subject complaints (e.g. equal treatment complaints), claims, and related administrative or judicial proceedings, as well as the protection of the Data Controller's reputation and economic interests.
Scope of data processed	Name, e-mail address, telephone number, LinkedIn profile URL, net salary expectation and CV information (CV attachment) provided by the applicant.
Retention period and preservation of application data and CVs	Progressive Advertising Agency processes the personal data provided through the application form and CV upload until the purpose of the processing ceases (decision on filling the advertised position). On the basis of its legitimate interest (Article 6(1)(f) GDPR), the Data Controller is entitled to retain application data and CVs for up to 5 years from the date of submission (in accordance with Section 6:22(1) of Act V of 2013 on the Civil Code, claims are subject to a 5-year limitation period unless the Civil Code provides otherwise), in connection with potential legal disputes and defence in administrative or judicial proceedings. It is further emphasised that the Data Controller may retain the application data and CV of applicants who have given their consent even after the relevant position has been filled, until the withdrawal of consent, but for a maximum of a further 2 years (for the purpose of informing them about similar vacancies).

Additional data processing

The Data Controller also processes the personal data of data subjects in backups (for one month) on the basis of its legitimate interest (Article 6(1)(f) GDPR), which is the protection of the Data Controller's IT system and the data stored therein. The hosting data processor partner: Rackforest Zrt., 1132 Budapest, Victor Hugo utca 11, 5th floor, info@rackforest.hu. If the Data Controller intends to carry out further data processing, it shall provide prior information on the material circumstances of the processing.

Information on data processors and their activities

Data processing for the storage of personal data	Data processor name: Rackforest Zrt. Mailing address: 1132 Budapest, Victor Hugo utca 11, 5th floor. E-mail: info@rackforest.hu Rackforest Zrt. stores data on its own servers leased by Progressive Advertising Agency under a written contract. It is not authorised to access the personal data.
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4. DATA SECURITY MEASURES

The Data Controller declares that it has taken appropriate security measures to protect personal data against unauthorised access, alteration, transmission, publication, erasure or destruction, accidental destruction and damage, as well as inaccessibility resulting from changes in the technology applied.

5. RIGHTS OF DATA SUBJECTS

5.1. During data processing, you are entitled to:

Right to information and fulfilment of data subject requests	The Data Controller shall take appropriate measures to provide data subjects with all the information referred to in Articles 13 and 14, and any communication under Articles 15 to 22 and 34 of the GDPR relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language. During the period of data processing, you may request information from the Data Controller regarding the processing of your personal data, and you may exercise your further data processing rights by submitting a request to the Data Controller. The Data Controller shall inform you in an intelligible form within the shortest possible time, but no later than within one month. If necessary, taking into account the complexity and number of requests, this deadline may be extended by a further two months. The Data Controller shall inform the data subject of the extension within one month, indicating the reasons. If the request was submitted electronically, the information shall be provided electronically where possible. If the Data Controller does not take action, it shall inform the data subject within one month of the reasons for the failure to act and of the possibility of lodging a complaint with a supervisory authority and seeking judicial remedy.
Right to rectification	You are entitled to have inaccurate personal data relating to you rectified without undue delay. You are also entitled to request the completion of incomplete personal data, including by means of providing a supplementary statement.
Right to erasure	You may request the erasure of your personal data if they are no longer necessary for the purpose for which they were collected, you have withdrawn your consent (in consent-based processing), you have objected to the processing (in legitimate interest-based processing) and there is no overriding legitimate ground, the data have been unlawfully processed, or the data must be erased to comply with a legal obligation under Union or Member State law applicable to the Data Controller.
Right to restriction of processing (blocking)	You may request restriction if you contest the accuracy of the data (restriction applies while the Data Controller verifies accuracy), the processing is unlawful and you oppose erasure and request restriction instead, the Data Controller no longer needs the data but you require them for legal claims; or you have objected to the processing (restriction applies while determining whether the Data Controller's legitimate grounds override yours).
Right to object	You may object at any time, on grounds relating to your particular situation, to processing based on the legitimate interest of the Data Controller. The Data Controller shall cease processing unless it demonstrates compelling legitimate grounds overriding your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. Where data are processed for direct marketing, you may object at any time, and the data may no longer be processed for that purpose.
Right to withdraw consent	The data subject is entitled to withdraw their consent at any time. The withdrawal shall not affect the lawfulness of processing carried out prior to the withdrawal.

5.2. Legal remedies

The data subject may exercise the above-listed rights by e-mail sent to the Data Controller's address or from an identifiable e-mail address, or by post in a signed letter to the registered seat.

Without prejudice to available administrative or non-judicial remedies – including the right to lodge a complaint with a supervisory authority – the data subject has the right to an effective judicial remedy if they consider that their GDPR rights have been infringed. Proceedings against the Data Controller must be brought before the courts of Hungary. Such proceedings may also be brought before the courts of the data subject's habitual residence. In Hungary, such cases fall within the jurisdiction of the regional court. The data subject may bring the action before the regional court having jurisdiction over their domicile or habitual residence. Information on the courts is available at www.birosag.hu. You may also lodge a complaint with the National Authority for Data Protection:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
E-mail	ugyfelszolgalat@naih.hu
Mailing address	1055 Budapest, Falk Miksa utca 9–11
Postal address	1363 Budapest, Pf.: 9.
Telephone	+36 (1) 391-1400
Website	www.naih.hu

6. MISCELLANEOUS PROVISIONS

The Data Controller shall provide information on any data processing not listed in this Notice at the time of data collection. We inform our clients that courts, prosecutors, investigative authorities, administrative offence authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information, and other bodies authorised by law may contact the Data Controller for the purpose of providing information, disclosing, transferring data or making documents available.

Progressive Advertising Agency shall disclose personal data to authorities – where the authority has specified the precise purpose and scope of the data – only to the extent strictly necessary for achieving the purpose of the request.