

# **Vertabelo SA**

## **PRIVACY POLICY**

Thank you for visiting our Vertabelo website. Vertabelo SA regards our clients' privacy as one of our most important values. We take care of the protection and security of data of those whose data we process. We respect your right to privacy and we take measures to protect your data, in particular to ensure that personal data is processed in accordance with the law and taking into account the rights of data subjects.

Vertabelo SA may update this privacy policy from time to time. Any changes to this policy will be posted on the website. We encourage you to review the actual privacy policy whenever you visit Vertabelo website.

### **1. Who is responsible for data processing and who can be contacted?**

The Controller is Vertabelo SA with its registered seat in Warsaw, ul. Filona 16, 02-658 Warszawa.

If you need any information related to the protection of personal data or you want to exercise your rights regarding data processing, contact the Controller or the Data Protection Officer appointed by him.

Such contact may be made by e-mail, per telephone or in writing to the Controller's address: Vertabelo SA, IOD, ul. Filona 16, 02-658 Warszawa, e-mail: [iod@vertabelo.com](mailto:iod@vertabelo.com), +48 22 853 48 30.

### **2. For what purpose and how long do we process your personal data?**

Your personal data may be processed by us for the purpose of processing your job application, sending the Newsletter, in connection with your use of our website, as part of contact with clients, potential clients and other cooperating entities, as well as to respond to requests of persons exercising their rights in connection with the processing of personal data.

Below, we would like to present detailed information about what personal data we collect, on what basis we process it and how long we process your data. Depending on how we collect your data, the scope of this data and the legal grounds for processing may vary. Please read the detailed information on data processing below.

#### **2.1. Processing of personal data for recruitment purposes**

##### **2.1.1. For what purpose and on what basis do we process your data?**

Your data will be processed in order to carry out the current recruitment process and for the purposes of future recruitments (if you agree).

The basis for the Controller's processing of your personal data in order to conduct the current recruitment process to the extent specified in the provisions of labor law (Article 221 of the Polish Labor Code) is Article 6 section 1 letter b) of the GDPR, while for other data, the basis for processing is your consent – Article 6 section 1 letter a) of the GDPR, or the legitimate interest of the Controller – Article 6 section 1 letter f) of the GDPR. The legitimate interest of the Controller expressed in Article 6 section 1 letter f) involves processing data obtained in the course of recruitment to check your abilities, as well as to establish, investigate or defend against claims.

The basis for the Controller's processing of your personal data for the purposes of future recruitment processes is your consent, i.e. Article 6 section 1 letter a) of the GDPR. You have the right to withdraw your consent at any time, this will not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal. Providing your personal data in the scope resulting from Article 22(1) of the Polish Labor Code is necessary to participate in the recruitment procedure. Providing other data is voluntary.

### **2.1.2. How do we collect your data?**

We will process your data if you provide it to us by submitting an application for a job with the Controller. We may also collect your data from entities providing recruitment services or employment agencies, as well as from publicly available Internet websites, from related companies, as part of internal recruitment processes or from the Controller's employees, as part of internal command programs. We will process data collected from third parties if there is an appropriate legal basis (e.g. you have agreed to send your job application to the Controller).

### **2.1.3. How long will we process your data?**

The Controller will process your personal data until the end of the recruitment in which you participate, and in justified cases also after its completion, for a period of no more than 3 years.

If you consent to the processing of data for the purposes of future recruitments, the Controller will process your personal data for a period of 2 years from the date of consent, but no longer than until the consent is withdrawn, and if you take part in the recruitment during this period, the Controller will process your personal data until the end of the last recruitment process in which you participate, and in justified cases also after its completion, for a period not longer than 3 years.

## **2.2. Processing of personal data of the website users**

### **2.2.1. For what purpose and on what basis do we process your data?**

Your data will be processed in order to:

- conclude and perform a contract, if you are a party to this contract – Article 6 section 1 letter b) of the GDPR,
- perform our obligations arising from legal provisions, including tax and accounting regulations – Article 6 section 1 letter c) of the GDPR,
- perform legitimate interests of the Controller or a third party – Article 6 section 1 letter f) of the GDPR. Such an objective resulting from the Controller's legitimate interest is:
  - handling your application / inquiry, if you contacted us via the contact form or other means of communication,
  - analysing statistics on the use of our website, adjusting content and improving services,
  - keeping internal registers, lists, analyzes, conducting audits, document archiving, data exchange using IT systems,
  - direct marketing of the Controller's services and entities affiliated with the Controller ("entities from the e-point Group"),
  - establishment, exercise or defense against claims.

Providing personal data in order to perform the obligations arising from legal provisions is obligatory. Providing data for the conclusion and performance of the contract is necessary, and failure to provide data may result in the inability to conclude the contract or inability to properly perform it. In other cases, providing data is voluntary.

### **2.2.2. How do we collect your data?**

We will process your data if you give us access to it. In addition, if you are an employee, co-worker, authorised representative or representative of a client or potential client or cooperating entity, we may receive your personal data from the entity you represent or work for. We may also receive your data from publicly available registers or internet portals, as well as from internal databases of e-point Group entities. We will process data collected from third parties if there is an appropriate legal basis for it.

### **2.2.3. How long will we process your data?**

In the case of data processed for the purpose of concluding and performing a contract, the data will be processed for the duration of the contract and its settlement. With regard to data processed to perform our obligations under the law, the data will be processed as long as required by law, as well as for the period necessary to demonstrate to the relevant authorities that the legal obligations have been met. Data processed to implement the legitimate interests of the Controller or a third party will be processed for the period necessary to achieve this purpose. Data processed to establish, exercise or defend against claims will be processed for the time necessary to assert specific claims or until the expiry of the limitation period (in principle, 6 years). Data processed for marketing purposes will be processed until an objection is lodged. In any case, the Controller will process your personal data no longer than it is necessary to achieve a specific purpose.

## **2.3. Processing of personal data as part of contact with clients and other cooperating entities**

### **2.3.1. For what purpose and on what basis do we process your data?**

As part of our business activities, we collect and process, i.a., personal data of the following persons:

- clients or potential clients,
- other cooperating entities or potential cooperating entities (such as suppliers or subcontractors),
- employees, associates, authorised representatives or representatives of the above mentioned entities.

Depending on the purpose of processing, personal data processed may include data related to the conclusion and performance of contracts, contact details, data contained in correspondence, data regarding settlements.

Your data will be processed in order to:

- conclude and perform a contract, if you are a party to this contract – Article 6 section 1 letter b) of the GDPR,
- perform our obligations arising from legal provisions, including tax and accounting regulations – Article 6 section 1 letter c) of the GDPR,
- perform legitimate interests of the Controller or a third party – Article 6 section 1 letter f) of the GDPR. Such an objective resulting from the Controller's legitimate interest is:
  - conclusion and performance of contracts with clients and cooperating entities,
  - communication with clients and cooperating entities or potential clients and cooperating entities,
  - keeping internal registers, lists, analyzes, conducting audits, document archiving, data exchange using IT systems,
  - direct marketing of the Controller's services and entities from the e-point Group,

- establishment, exercise or defense against claims.

Providing personal data in order to perform the obligations arising from legal provisions is obligatory. Providing data for the conclusion and performance of the contract is necessary, and failure to provide data may result in the inability to conclude the contract or inability to properly perform it. In other cases, providing data is voluntary.

### **2.3.2. How do we collect your data?**

We will process your data if you give us access to it. In addition, if you are an employee, co-worker, authorised representative or representative of a client or potential client or cooperating entity, we may receive your personal data from the entity you represent or work for. We may also receive your data from publicly available registers or internet portals, as well as from internal databases of e-point Group entities. We will process data collected from third parties if there is an appropriate legal basis for it.

### **2.3.3. How long will we process your data?**

In the case of data processed for the purpose of concluding and performing a contract, the data will be processed for the duration of the contract and its settlement. With regard to data processed to perform our obligations under the law, the data will be processed as long as required by law, as well as for the period necessary to demonstrate to the relevant authorities that the legal obligations have been met. Data processed to implement the legitimate interests of the Controller or a third party will be processed for the period necessary to achieve this purpose. Data processed to establish, exercise or defend against claims will be processed for the time necessary to assert specific claims or until the expiry of the limitation period (in principle, 6 years). Data processed for marketing purposes will be processed until an objection is lodged. In any case, the Controller will process your personal data no longer than it is necessary to achieve a specific purpose.

## **2.4. Processing of personal data to implement the requests of persons who are subject to data protection law**

### **2.4.1. For what purpose and on what basis do we process your data?**

The personal data processed includes the applicant's identification data and data related to the handling of the application or request.

Your data will be processed in order to perform our obligations arising from legal provisions in connection with the handling of your application or request – Article 6 section 1 letter c) of the GDPR. The processing is necessary to fulfill the legal obligation incumbent on the Controller. Providing data is not mandatory, but necessary to complete the request or application.

### **2.4.2. How do we collect your data?**

We will process your data if you give us access to it.

### **2.4.3. How long will we process your data?**

The data will be processed as long as required by law, as well as for the period necessary to demonstrate to the relevant authorities that the legal obligations have been met. In any case, the Controller will process your personal data no longer than it is necessary to achieve a specific purpose.

## **3. Who can your data be transferred to?**

The Controller may transfer your personal data to other recipients entrusted with the processing of personal data on behalf of and for the benefit of the Controller in

connection with conducting business or operating IT systems. In addition, the Controller will share your personal data with other recipients, such as public administration bodies, courts, as long as such an obligation results from legal provisions. Your data may be transferred to third countries and international organizations, provided that entities established in these countries adequately protect personal data. In this case, the Controller will apply appropriate measures, such as e.g. standard contractual clauses approved by the European Commission or ensure that the transfer of data takes place within the country which is the subject of the European Commission decision on the appropriate protection of personal data. You can also get additional information regarding the transfer of data outside the EEA and a copy of appropriate security by directing the question to the contact address.

#### **4. What are your rights?**

You have the right to:

- access your personal data and receive a copy of the personal data being processed;
- rectify your incorrect data;
- request deletion of data (right to be forgotten) in the event of circumstances provided for in Article 17 of the GDPR, e.g. when data are not necessary to achieve the purposes for which they were collected or you withdraw your consent to their processing;
- request to limit data processing in cases indicated in Article 18 of the GDPR, e.g. when you question the correctness of personal data;
- object to data processing in cases indicated in Article 21, e.g. if data is processed for direct marketing purposes;
- transfer the data provided, processed in an automated manner;
- withdraw your consent to data processing (whereby withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent given before its withdrawal).

If you think that your personal data is being processed unlawfully, you can lodge a complaint to the supervisory body, which is the President of the UODO [Personal Data Protection Office], ul. Stawki 2, 00-193 Warszawa.

#### **5. Cookies**

We use cookies. Cookies are small files that a site or its service provider transfers to your computers hard drive through your web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. Cookie typically contains the name of the its website, the storage time, and a unique number that identifies your browser. Detailed information about the possibilities and ways of handling cookies are available in the settings of your web browser.

We use cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

You may wish to restrict the use of cookies or completely prevent them from being set. Most browsers provide for ways to control cookie behavior such as the length of time they are stored – either through built-in functionality or by utilizing third party plugins. If you disable cookies, please be aware that some of the features of our service may not

function correctly. You may at any time change the settings of your browser to prevent Vertabelo SA to the use of cookies.

On the WebSite can be used two types of cookies - session and constants. Session cookies remain on the User device when using the Website. Cookies permanently remain on the device's as long as you have a set shelf life, or until you delete them.

Cookies are published by and are available for Vertabelo with its registered office at ul. Filona, 16, 02-658 Warsaw, Poland. Cookies may also be used by the Vertabelo SA partners.

## **6. IP address**

Our servers serve WebSite collect IP address assigned to the devices from which you visit our website. IP address is a numerical label assigned to each device (e.g., computer, printer) participating in a computer network that uses the Internet Protocol for communication.