

Privacy notice based on article 13 and 14 of GDPR

We provide you with the following information due to recruiting process you are taking part in, or to which we would like to invite you. This refers to the manner and scope in which we will process (save, analyze, etc.) information which allow to identify you, i.e. you personal data. You will also find here information regarding rights you are entitled to in this context.

Who controls your data?

Your personal data controller, i.e. the person who is responsible for your personal data is Spokko Sp. z o.o. in organization (Warsaw, 03-301, Jagiellońska 74) ("**Controller**" or "**US**").

You can contact the Controller by sending an email to: hello@spokko.com

How we obtained your data?

We receive your data when:

- you submit your application to us,
- through another person (e.g. your friend, who recommends you for a position).

Controller or recruiting agencies acting on our behalf may obtain some information about you from publicly available sources, such as LinkedIn, Goldenline or recruiting platforms - in such case, we will tell you about it at first contact.

What data about you we process?

In case we come to you with an invitation, we process the following categories of your data: name, surname, e-mail address, phone number, URL of your profile on a publicly available source, where you gave your contact details.

If we receive your CV, we will process the data included in your application:

name, surname, date of birth, place of birth, citizenship, address of residence, address of domicile, correspondence address, e-mail address, phone number, education - type, name of the school you graduated from, education period, field of study, employment history - name of the workplace, employment period, position.

In case the recruiting process will require organizing your visit or taking care of visa formalities, we will additionally process you data included in your identity document (e.g. your passport).

Why we processes your data?

Controller processes your personal data for the following purposes:

- a) to conduct the recruitment process, which includes negotiating conditions of employment in order to hire a candidate in the company Spokko Sp. z o.o.A
- b) to work against discrimination in employment;
- c) to fulfil legal requirements related to limitation of employing certain persons (e.g. foreigners);
- d) to obtain candidates - searching for candidates in publicly accessible sources in order to initiate

- contact and invite to recruiting process;
- e) in applicable cases - to organize travel and accommodation for a candidate during recruiting process;
 - f) in applicable cases - to provide support in obtaining visas necessary to take part in the recruiting process;
 - g) to deal with complaints, requests and claims filed in context of ongoing recruiting process;
 - h) to conduct a recommend-a-friend programme;
 - i) to fulfil the obligations resulting from the provisions of law, including tax and accounting laws;
 - j) in applicable cases - for the purposes of litigation, arbitration or mediation;
 - k) to document personal data processing, i.e. for accountability purposes as required by General Data Protection Regulation (GDPR).

Why we are entitled to process your data?

Controller is entitled to process your personal data based on provisions of law (e.g. Article 22¹, Article 18^{3a} § 1 of the Polish Labor Code, provisions of Act of December 12, 2013 on Foreigners).

Also, we process your personal data when it's necessary in order to take steps at your request prior to entering a contract (article 6(1)(b) of GDPR), e.g. for the purpose of negotiating your salary or other conditions of employment.

Moreover, we process your personal data for the purpose and in scope necessary to pursue our legitimate interest (art. 6(1)(f) of GDPR), as indicated in point [*d – h, i – k*].

In other cases, your personal data is processed based on your consent, e.g. when your recruiting process will involve processing your personal data which goes beyond the scope of data required to be provided by the provisions of law; in case your data is submitted in the recommendation programme; or in case you accept our invitation to take part in future enrollments.

Upon your consent we will be allowed to share your data with other companies of our capital group for their recruiting purposes.

Are you obliged to provide us with your personal data?

Your obligation to provide us with your personal data arises from Article 22¹ of the Polish Labor Code, among other provisions of law. In case of negotiating employment conditions providing we may need your data to conduct a recruiting process and to conclude an agreement with you. If you don't provide us with such information, recruiting process may become difficult or impossible to conduct. In other cases, data submission is voluntary.

What are your rights in regards of data processing?

You may request Controller to exercise the following rights you have: the right to access, rectify and erase your data, limit its processing, transfer it, a right not to be a subject to automated decision-making, including profiling, and to object to the processing of your personal data.

You may exercise these rights, when:

- regarding right to rectify data - data is incorrect or incomplete;
- regarding right to erasure of data - personal data are no longer necessary in relation to the purposes for which they were collected by Controller; you withdraw your consent on which the processing is based (in scope of this consent); you object to data processing; data has been processed unlawfully; data have to be erased for compliance with a legal obligation;
- regarding restriction of processing: data is incorrect - for a period enabling Controller to verify your data; data has been processed unlawfully, but you don't want it to be removed; Controller no longer needs your data, but you may need them for the exercise or defence of your legal claims; you object to processing data - until verification whether our legitimate grounds override the grounds of objection;
- regarding right to transfer data: the processing is based on consent or on a contract and the processing is carried out by automated means.

To the extent you gave us your consent to process your personal data, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on the consent before its withdrawal.

You can lodge a complaint regarding processing of your personal data by Controller to your local data protection authority or to the President of the Polish Office of Data Protection - Prezes Urzędu Ochrony Danych Osobowych in Poland.

When you can object to processing of your data?

You have the right to object to the processing of personal data when they are processed on a legitimate interest basis, and the objection is justified by your particular situation.

Who do we share your personal data with?

The recruitment we are currently conducting concerns employment in the company Spokko S.A., which formally is not registered yet, but will be established in the near future. In order to accelerate the employment process, we decided to start recruitment now. Therefore, as soon as the company Spokko S.A. will be formally established, we will pass your personal data to it, so the company Spokko S.A. can continue the current (and if you agree - also future) recruitments.

Moreover, Controller may share your personal with the following categories of partners supporting him in recruiting processes:

- recruiting agencies;
- partners providing project management tools, which we use to manage recruiting processes;
- partners supporting us in organizing your travel and accommodation.

How long are we going to store your data?

Your personal data will be processed as long as needed for the recruiting process, i.e. until the recruiting process ends, and after that for the duration and to the extent required by provisions of law or for Controller's legitimate interest in defending against potential claims related to the recruiting process.

In case you gave us your consent to process your personal data, in particular for the purpose of future recruiting processes or for processing data which go beyond the scope of data required to be provided by the provisions of law, your personal data will be processed until you withdraw your consent.

Do we process your personal data automatically (including profiling) in a way that affects your rights?

Your personal data will not be used for automated decision making, including profiling. By profiling, we mean the processing of your data by using them to evaluate certain information about you, in particular to analyze or forecast your personal preferences and interests.