

## **PRIVACY POLICY FOR PEOPLE INTERESTED IN COOPERATION WITH RITS PROFESSIONAL SERVICES SP. Z O.O. (CANDIDATES)**

The personal policy of RITS Professional Services sp. z o.o. with its registered office in Warsaw (hereinafter referred to as RITS) assumes constant search and acquisition of people interested in starting cooperation with RITS.

Thank you for your interest in starting cooperation with us, the purpose of this document is to assure you that we make every effort to properly protect your personal data, and to present to you how and to what extent we will use them. RITS has implemented European data protection regulations in the form of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (general regulation on data protection) (Journal of Laws EU L 119 of 4 May 2016, p. 1) ("GDPR") and the provisions of the Act of 10 May 2018 on the protection of personal data.

This Policy (hereinafter the "Privacy Policy") has been prepared by RITS Professional Services sp. z o.o. with its registered office in Warsaw (address: Wołoska 9, 02-583 Warsaw), entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the capital city Warsaw in Warsaw, XIII Commercial Division of the National Court Register under the number KRS 0000538538, NIP 5213635475 (hereinafter referred to as "RITS" or "Company" or "Administrator") and is addressed to candidates for cooperation with RITS, applying in any form, both by traditional means or electronic and telephone.

Submitting an application, providing us with your CV, results in taking part in our recruitment processes, both current and future. If you apply for a specific position, you can express your will that your data be processed only for the needs of one specific recruitment process in which you are applying, and we always suggest that you agree to participate also in our other recruitment processes, because we are never sure, that there will be no more favorable offer for you.

This Policy also applies to persons recommending RITS candidates to cooperate with RITS. We process the data of recommending persons to the extent necessary to process the application, conclude a contract with the referrer and pay the referrer the remuneration.

### **Who is responsible / is the Administrator of your personal data.**

The administrator of your personal data is RITS Professional Services sp. z o.o. with its registered office in Warsaw (address: Wołoska 9, 02-583 Warsaw), entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw Warsaw in Warsaw, XIII Commercial Division of the National Court Register under the number KRS 0000538538, NIP 5213635475.

How can you contact the Administrator.

1. At RITS, the Data Protection Officer is Michał Jaremek.

2. In matters relating to the processing of your personal data by the Administrator, you can contact the Administrator or the Data Protection Inspector by sending traditional correspondence to the address of RITS Professional Services sp. z o.o., ul. Wołoska 9, 02-583 Warsaw, or via the e-mail address: [rodo@rits.center](mailto:rodo@rits.center).

### **What is the basis and for what purpose we process your personal data.**

We always process your personal data in a lawful manner, based on one of the following conditions, depending on whether our cooperation is based on an employment contract or other cooperation agreement (civil law contract), including one concluded with you, as entrepreneur (B2B contract).

#### Job contract

Your personal data, if the cooperation is based on an employment contract, is processed by the Administrator:

1. In order to carry out the recruitment process in the scope indicated in the Labor Code;
2. In order to prepare an employment contract, ie to take action at the request of the data subject (ie you) before concluding the contract;
3. To the extent that it is necessary to establish, investigate or defend claims in court, administrative or other out-of-court proceedings - in order to implement the Administrator's legitimate interest in establishing, investigating or defending against such claims.

#### Civil law contracts (including B2B contracts)

Your personal data, in the event that the cooperation will take place on the basis of civil law contracts - orders, for the provision of services, for a specific work or other civil law, are processed by the Administrator:

1. In order to carry out the recruitment process on the basis of your consent to the processing of personal data for this purpose;
2. With regard to the data provided to us by you, necessary for the preparation of the contract, also for the preparation of the contract, ie in order to take action at the request of the data subject (ie you) before concluding the contract;
3. to the extent that it is necessary to establish, investigate or defend claims in court, administrative or other out-of-court proceedings - in order to implement the Administrator's legitimate interest in establishing, investigating or defending against such claims.

In the case of persons recommending candidates for RITS, if these persons are our associates, we process their data under concluded contracts in order to enable the calculation and payment of the commission due to the referrer. If the recommending person is not our associate, we process his data in order to conclude an agency agreement and pay the commission for the referral.

### **The source of your personal data.**

The data is obtained directly from you or may be obtained not directly from you, i.e. from other entities that have provided us with your personal data in connection with the provision of recruitment services to us by them, e.g. headhunters, recruiters, employment agencies, etc. to whom you provided your personal data in connection with your job search. In the scope of programs organized by us to encourage you to cooperate with us, we may also receive your data from your friends, who will find that you would fit perfectly in our team and will provide us with your data with your consent. Candidates recommending candidates also provide us with their personal data in order to be able to pay their remuneration, as well as to inform the candidates about the person recommending them.

With regard to data that has not been provided to us directly by you, we process it to the extent that includes the following data categories: name, surname, telephone number, e-mail address, home address, previous employment history, professional experience and education, possibly additional information that you have included in your CV yourself.

### **What are your rights to personal data.**

Pursuant to the provisions of the GDPR, you have a number of rights with regard to your personal data, in particular:

- a) The right to access your personal data. You can exercise your right to access your data at any time.
- b) The right to rectify and supplement data. You have the right to request the Administrator to immediately rectify your personal data that is incorrect, as well as to request supplementing incomplete personal data.
- c) The right to request the deletion of data. You have the right to request the Administrator to delete your personal data immediately in any of the following cases:
  - i. when personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
  - ii. when the data subject has withdrawn the consent on which the processing is based and there is no other legal basis for the processing;
  - iii. when you object to the processing of data referred to in point e) below and there are no overriding legitimate grounds for the processing of this data;
  - iv. when personal data are processed unlawfully;
  - v. when personal data must be deleted in order to comply with a legal obligation provided for in European Union law or Polish law;
  - vi. when personal data has been collected in connection with offering information society services - in accordance with the GDPR. However, the administrator will not be able to delete your personal data to the extent indicated in the GDPR, including the processing of which will be necessary: (i) to exercise the right to freedom of expression and information, (ii) to fulfill a legal obligation requiring processing pursuant to European Union or Polish law, (iii) to establish, assert or defend claims.
- d) The right to request restriction of data processing. You have the right to request the Administrator to limit processing in cases where:
  - i. you question the correctness of personal data - for a period allowing the Administrator to check the correctness of this data;
  - ii. the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
  - iii. The administrator no longer needs personal data for the purposes of processing, but you need them to establish, assert or defend claims;
  - iv. you have objected to the processing referred to in point e) below - until it is determined whether the legitimate grounds on the part of the Administrator override your grounds for objection.
- e) Right to object. You have the right to object to the processing of your personal data in the event that the Administrator processes this data in a legitimate interest, including for direct marketing. To the extent that the data is processed for purposes other than direct marketing, the Data Administrator may disregard the objection if he demonstrates the existence of valid legally valid grounds for processing, overriding your interests, rights and freedoms, or grounds for establishing, investigating or defending claims .

g) The right to withdraw consent. To the extent that the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing which was carried out on the basis of consent before its withdrawal.

h) The right to data portability. To the extent that your data is processed in order to conclude and perform a contract or processed on the basis of consent, and data processing is carried out in an automated manner - you have the right to receive from the Administrator in a structured, commonly used machine-readable format your personal data, which you have delivered before or during the cooperation with the Company. You also have the right to send this personal data to another administrator.

i) Right to lodge a complaint. You have the right to lodge a complaint against the processing of personal data by the Administrator to the supervisory body, which in Poland is the President of the Office for Personal Data Protection.

The rights referred to in point a) -g) above can be done by contacting our Data Protection Officer by sending traditional correspondence to the address of RITS Professional Services sp. z o.o., ul. Wołoska 9, 02-583 Warsaw, or via the e-mail address: [rodo@rits.center](mailto:rodo@rits.center).

The right to lodge a complaint referred to in point h) above can be exercised by contacting directly the President of the Office for Personal Data Protection - Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw.

#### **Providing personal data.**

Providing your personal data in the recruitment process is voluntary. Failure to provide the data will make it impossible to achieve the purpose of personal data processing, i.e. it will prevent the recruitment process with your participation.

#### **Who do we share your personal data with.**

We may share your personal data with the following recipients or categories of data recipients:

- a) Affiliates with us, belonging to the same capital group, service providers providing services on our behalf or on our behalf, as well as our clients looking for associates for whom we conduct recruitment processes. In contracts concluded with such entities, we require compliance with applicable data protection regulations.
- b) if such an obligation results from mandatory provisions of law, to the necessary extent also other third parties, in particular authorized state authorities.

#### **Data storage period**

We make every effort to ensure that your personal data is processed adequately and for as long as it is necessary for the purposes for which it was collected. With this in mind, in connection with the recruitment procedure, we distinguish two scopes of data processing:

- a) active data processing, i.e. processing in any way necessary from the perspective of the purpose for which the data was collected - participation in recruitment processes organized by us;
- b) data processing in the "inactive" mode, consisting in abandoning active data processing and limiting itself only to their storage in the event of possible claims.

To the extent that your personal data collected only for the purposes of recruitment processes, we process them actively only during the recruitment processes. Recruitment processes are carried out by us constantly, it may always turn out that your knowledge and experience allow you to cooperate in a more attractive area, therefore we try to update information on your professional experience, also gained in cooperation with us. to be able to offer you even better job opportunities.

If it is no longer possible to use your knowledge and experience in the recruitment processes organized by us or if your will is to take part in only one recruitment process, after the currently active processes have ended, your data will be deleted, unless longer processing is justified legal regulations, e.g. in connection with the pursuit of claims by you or another candidate in connection with the recruitment process.

If your consent to the processing of personal data also applies to future recruitment processes, this data is actively processed by us for a period of three years, and then the data is deleted, unless its longer processing is justified by law, e.g. in connection with an investigation claims by you or another candidate in connection with the recruitment process.

If we process your data in connection with your Candidate's instruction, the period of active processing ends after the period in which you are entitled to receive remuneration for the instruction, which is normally 12 months from the time of the instruction.

### **Changes to the Privacy Policy**

This Privacy Policy may be changed, in particular, if the need or obligation to introduce such changes results from changes in applicable law or the manner of recruitment, including changes in data recipients. Persons whose data is processed in accordance with this Privacy Policy will be notified of any changes in advance.