

Privacy Policy of the ZNOJDZIEM LIMITED LIABILITY COMPANY.

Who we are and how we process your personal data

ZNOJDZIEM is a recruitment company that recruits professionals. We are responsible for protecting the privacy of our candidates, clients, and users of our website. The way the ZNOJDZIEM entity will act as the Data Administrator depends on the services we perform for you, as described below.

We want to ensure safe and secure usage of the service by users. We will make every effort to ensure that the information you provide to us or that we collect through various channels (including our website, written correspondence (including email), conversations or meetings with our consultants, or through any of our offices or websites around the world) is used solely for the purposes set forth in this Privacy Policy.

As part of this Privacy Policy, we would like to inform you about the types of personal data we collect, the purposes for which we use the data, and how we process the data. We also aim to comply with the transparency obligation under the EU General Data Protection Regulation 2016/679 ("GDPR") and potentially applicable national laws.

Purpose

Our priority is to protect your personal information. This privacy policy explains how the Company processes and protects personal information regarding:

- candidates who register with us for positions we manage on behalf of other employers, candidates for positions in the Companies, or those who register through our website, job portals, social networks or other sources;
- potential candidates;
- potential clients;
- business contacts with our clients and suppliers; and
- users of our websites (collectively referred to as "you" or "user").

Our policy also aims to duly inform you of your right to privacy and your right to object to data processing. Please refer to the "Ways to contact us" section of this privacy policy to get in touch with us.

Personal data we collect

Candidates

When you register with us as a candidate to whom we provide a job search service, we process your personal information, including, but not limited to, your name, contact information and information from your CV. Within legally permissible limits, we may also collect information about your health (for example, disability information for reasonable workplace adjustments), information about diversity, with respect to race, ethnicity, sexual orientation and religion (for equal opportunity monitoring), and details of any unexpired criminal convictions if required by you or us when you apply for a position with us. The ZNOJDZIEM entity acting as the Administrator of the user's data in such a case will be the entity managing the process in which the user has applied to participate.

When you use our website, click on links you receive from us in e-mails, open or forward them, or register and allow us to notify you of job opportunities or other content, we also collect personal information from these interactions.

We also obtain personal data from third parties, among others,

- references when a user receives a job offer;
- previous employers - to confirm dates of employment;

- educational institutions - to verify the qualifications in terms of user education;
- credit reporting agencies - to check your financial background;
- publicly available sources like LinkedIn and social networks to enhance user information and provide better tailored offers;
- clients to whom we forwarded the user's CV and who made contact with the user as part of a job search and who provided feedback on the user's CV.

Potential candidates

We collect your personal data, including your name, contact information and biographical data obtained from publicly available sources like LinkedIn, CV websites or social networks, in order to contact you if we think you might be interested in our job search assistance. We may also obtain your personal data from other candidates or employers who recommend you as a contact person. In this case, the entity that acts as the Data Administrator for ZNOJDZIEM is the entity that employs the consultant within the structure that identified the user as a potential candidate.

Potential clients

We collect contact information and data related to your function or position in order to establish a business relationship with your company.

Users of our website or application

We collect personal data such as, IP address and other data regarding your device, needed to provide you with selected online content. We also collect data regarding the websites you browse. We also collect data regarding the search queries you have made.

We use cookies and similar technologies to collect most of this data. In this case, the entity that acts as Data Administrator for ZNOJDZIEM is the entity that owns the website. Details of this entity can be found in the legal notice of the website in question or in the list attached at the beginning of this Privacy Policy.

Clients

We collect personal data such as name, position and contact information. We process personal data about your communications, including information about the opening and forwarding of emails, newsletters and other content you receive from us. We also process user feedback on our candidates. In this case, the entity that acts as Data Administrator with ZNOJDZIEM is the entity that is party to the contract we sign with you or the company you represent.

When you provide us with information about a candidate (e.g., confirming that the candidate has worked with you or providing references through you), we obtain user data from the candidate and collect the data you provide about the candidate.

We process your personal data from publicly available sources like LinkedIn and social networks, or as you have participated in one of our events, or events whose organizers have the right to share participants' personal data with us.

Suppliers

Typically, we collect your name and contact information for your company. In this case, the entity that acts as Data Administrator with ZNOJDZIEM is the entity that is party to the contract we sign with you or the company you represent.

Sharing personal data

In some cases, it will be necessary for you to provide us with personal data. If you do not provide us with the personal data we require, we may refuse to provide our services.

How we use your personal data

Candidates

We use your personal data to:

- provide job search services;
- contact you;
- upload your CV and apply for positions;
- personalize your experience by creating a candidate profile;
- monitor equality and diversity;
- advise you on interviews and compensation; and
- send you direct marketing to inform you of job opportunities, industry reports and insights, events, promotions and contests, and other content according to your marketing choices.
- We also run targeted and relevant banner advertisements on our website and social networks to introduce you and like-minded people to job opportunities and content that we think will be of interest. The ads are selected based on the user's previous interactions with our website, emails and cooperation with our consultants. User response to our ads can be used to measure the effectiveness of our advertising campaigns and to improve our marketing strategy. This processing is carried out using cookies and only if you have previously given your consent.

Potential candidates and clients

We use your personal data to:

- determine whether you are interested in our services and how we can help you;
- contact you and determine your level of interest in our services.

Users of our website and application

We may use your personal data to:

- improve and personalize your experience when using our website or application; and
- personalize the advertising you receive from us.

Clients

We may use your personal data to:

- provide recruitment services to you;
- contact you;
- obtain your feedback on our services through customer satisfaction surveys, in order to improve and develop our services;

- maintain a business relationship with you;
- respond to your inquiries;
- fulfill our contractual obligations to you;
- establish, pursue or defend legal claims; and
- perform direct marketing.

Suppliers

We use your personal data to:

- contact you;
- maintain a business relationship with you;
- respond to your inquiries;
- fulfill our contractual obligations to you;
- establish, pursue or defend legal claims; and
- perform direct marketing.

You may opt out of receiving marketing messages from us by using the unsubscribe methods included in the messages we send you or by contacting us. We have also established a marketing preference center where you can review and make decisions about your marketing preferences and, at any time, opt out of receiving marketing materials from us.

Legal grounds for processing personal data

In accordance with the GDPR, we rely on the following legal grounds to process your personal data:

- Performance of a contract - to perform our obligations under a contract with you, such as when clients enter into service contracts and candidates accept our terms of use. Or with respect to potential clients or candidates in order to take the steps necessary to enter into a contract with us.
- Fulfillment of a legal obligation - we process your personal data to fulfill legal or regulatory obligations.
- Our legitimate interests or those of a third party - including:
 - responding to user requests and inquiries (in this case, the legitimate interest of the Companies is to maintain constant and up-to-date communication with clients and candidates, which is part of any business relationship);
 - optimizing our website performance and user experience;
 - contacting potential clients in order to establish business relationships with clients (the legitimate interest of ZNOJDZIEM is to maintain any kind of relationship with the company where the contact person works).
 - informing about our services, job offers, industry reports and information, events, promotions, and contests (the legitimate interest of ZNOJDZIEM is to inform clients and candidates about similar services and products), as well:
 - ensuring that our operations are conducted in an efficient manner and conducting satisfaction surveys of our services.

We have conducted a legitimate interest assessment to confirm that our interests do not override the interests of our clients or fundamental rights and freedoms; you can request such an assessment using the contact information below.

Consent

Under certain circumstances, we ask for your consent to process your personal data. For example, if you register for a specific job posting, we also offer you the option to register to receive similar job alerts, or in case we conduct research on talent trends. As far as we process personal data based on your consent, you have the right to withdraw your consent at any time. If you wish to withdraw your consent to data processing, please contact us.

Automated decision-making and profiling

We do not make decisions solely on the basis of automated data processing; human intervention is always required before a decision is made.

We conduct two types of profiling based on the personal data of candidates:

- JobMatch is a tool available on our website for candidates to upload their CVs, so we can recommend job opportunities that match their skills. However, this profiling does not limit or prevent access to other jobs and positions.
- Smart search of our client database allows us to filter CVs when multiple applications are received for the positions offered, on keywords, years of experience or area of expertise. Then an analysis of the submitted CVs is carried out and after matching keywords and analyzing the suitability of candidates for the position, a smaller group of candidates is generated. As explained above, this process is always controlled by the recruiter, so decisions are not made in an automated manner.

It is important to note that none of this profiling has legal or similar material effects on candidates. However, if you would like to receive more information, please contact us.

With whom we share your personal data

Under certain circumstances, we share your personal data with:

Other companies within our Group

ZNOJDIEM is a group of companies operating in the global market. Our recruitment experts and key company employees in payroll and IT support positions are located around the world. We may share or give access to your personal data with companies within the European Economic Area (EEA), as well as those located outside the EEA, complying with the obligations applicable to the GDPR international data transfer regime.

For example, if you are in Germany or France and are looking for a job there, or if you are looking for a qualified specialist or recruitment partner for your company, we may share your personal information with our recruiters specializing in the German and French markets based in Turkey (see list of entities above). They process your personal data on behalf of our German or French entities as needed (see list above). For such data transfers, an adequate level of data protection is ensured on the basis of the intra-group agreement and standard contractual clauses, as described below.

We have an intra-group data transfer agreement that includes Standard Contractual Clauses (SCCs) approved by the European Commission, which allow cross-border transfers of personal data from the EEA to third countries outside the EEA, (as data protection laws outside the EEA may not provide a level of protection equivalent to data protection laws in the EEA) („SCCs”).

Please contact us if you would like a copy of the SCCs.

The purposes of sharing your personal data with the companies of ZNOJDZIEM group is

- to provide basic services, centralized in one entity, such as IT, sales and sales support services, in which case these entities will have access to your personal data and process it as data processors, according to the instructions of the Data Administrator,
- to manage at the global level, regional level, senior management positions, or lead key accounts, which requires cooperation between different companies within the group, and
- to manage jobs that can be performed remotely. The legal grounds for personal data processing activities is the performance of the contract concluded with clients or candidates or taking the steps necessary to conclude the contract and the legitimate interest of ZNOJDZIEM in providing services using internal resources.

Note that if a user registers as a candidate in a country other than the one in which he or she originally joined ZNOJDZIEM, a unique record will be created for him or her. A unique record avoids duplicates and improves the accuracy of personal data. For this reason, the respective companies of ZNOJDZIEM group will share your personal data as independent Data Administrators.

Third parties

If you are a candidate, your personal data is shared with clients with vacancies you are interested in. The legal grounds in this case will be the same as described above: the performance of the contract with clients and candidates or taking the steps necessary to conclude the contract, or the legitimate interests of the relevant entities within ZNOJDZIEM group to provide information about candidates and services to their clients.

We share your personal data, and where necessary and permitted by law, special category data, with third-party service providers who provide services and act on our behalf in:

- conducting employment reference checks;
- conducting qualification checks;
- conducting criminal record checks (where necessary);
- verification of the data you have provided from external sources;
- conducting psychometric assessments or aptitude tests;
- hosting personal data;
- providing professional advice;
- providing us with data analysis;
- conducting testing and development work on our business technology systems;
- administering surveys or contests on our behalf;
- assisting us in communicating with you; and

- conducting surveys and sending emails or providing other direct marketing services.

Based on our contracts, we require our third-party suppliers to maintain minimum standards of confidentiality and data protection. If we need to send personal data outside the EEA, we provide appropriate safeguards, such as Standard Contractual Clauses.

Other information

In addition, we may disclose your personal data:

- if we are legally obligated to do so;
- to law enforcement, regulatory agencies, the judiciary, or other government officials; and
- to the new owners of the company and their advisors in the event of a reorganization, merger, sale, joint venture, assignment or transfer or divestiture of all or part of our company's shares.

Security of personal data

We have implemented and maintain appropriate technical and organizational measures to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. Only authorized employees and third-party service providers have access to personal data on grounds of necessity and a contractual obligation to treat the information as confidential.

How long we keep your personal data

We keep your personal data for as long as necessary to fulfill the purpose for which we collected it, which may be an ongoing purpose. For example, if you are a candidate, we will keep your personal data for the duration of the business relationship and further because we often support candidates in their job search for many years.

We keep some personal data longer than others. To determine the appropriate duration of storage of personal data, we take into account factors such as the purposes for which we process personal data, including legal, regulatory, accounting, and reporting obligations, the nature and amount of your personal data stored, and the potential risk of harm to you as a result of unauthorized use or disclosure of your personal data.

If we process your personal data for direct marketing purposes, we will continue to do so until you ask us to stop and for a short time thereafter (to allow us to comply with your request). In order to be able to fulfill your request, we also store information about your request to stop direct marketing or not to process your data indefinitely.

Your rights regarding the personal data we keep about you

You have certain rights under EU data protection laws. These rights include the right to request from us a copy of your personal data, the right to access, rectify, erase or restrict the processing of the personal data you have provided to us, in connection with the contract or with your consent, in a structured machine-readable format, and to request that we share (transfer) that data to another Data Administrator. In addition, in certain circumstances (in particular, when it is not necessary to process your personal data to meet contractual or other legal requirements, or when we use your data for direct marketing purposes), you may object to the processing of your personal data.

The above rights may be limited, for example, if complying with your request would result in the disclosure of another person's personal data, if doing so would violate the rights of a third party (including ours), or if you request us to delete information whose retention is required by law or whose retention is in our legitimate interest. When responding to your request, we will inform you of any relevant exemptions.

Contact us

Exercising user rights

To exercise your rights, withdraw your consent to data processing or opt out of receiving marketing information from us, please:

- write to us at e-mail address v.stretskite@znoydzem.com

ZNOJDZIEM LIMITED LIABILITY COMPANY

Compliance Department

67A WOŁODYJOWSKIEGO street, off. WARSZAWA, post code 02724, post office WARSZAWA, country POLAND

Questions and complaints

If you have any questions about our privacy policy, our processing of your personal data, or wish to file a complaint, please send a message to us or to our Data Protection Officer at: v.stretskite@znoydzem.com

If you have reasonable doubts or believe that a data protection violation has occurred, you have the right to file a complaint with the supervisory authority.

Changes to our Privacy Policy

We may change this privacy policy at any time. We will post updates on our site.