

INFORMATION FOR JOB CANDIDATES REGARDING THE PROCESSING OF PERSONAL DATA

1. Data controller

The controller of your personal data is DataWalk S.A. with its registered office at ul. Rzeźnicza 32-33, 50-130 Wrocław (hereinafter also referred to as "**DATAWALK**" or "**Controller**"). Regarding the protection of your personal data, you can contact us at the following email address: GDPR@datawalk.com or in writing to the address of our registered office.

2. Legal basis and purpose of data processing

DATAWALK processes your personal data for the purposes described below ("**Recruitment Process**").

In order to conduct the Recruitment Process, DATAWALK processes personal data for the purposes listed below and on the following legal bases:

- processing is necessary for the conclusion and performance of a contract (Article 6(1)(b) of the GDPR) – we process your personal data, in particular basic data, data concerning qualifications and licenses, as well as other data provided, in connection with activities aimed at concluding an employment contract or a civil law contract, including those aimed at taking all necessary steps prior to the conclusion of the above-mentioned contracts;
- processing is necessary for compliance with a legal obligation (Article 6(1)(c) of the GDPR) – in specific cases, we process your data because the law requires it. For example, during recruitment for an employment contract, we must process data specified in Article 22¹ of the Labor Code (basic details and information about qualifications and authorizations).
- processing is necessary for the purposes of the legitimate interests pursued by the Controller (Article 6(1)(f) of the GDPR) – where applicable, to establish, pursue, or defend legal claims;
- consent (Article 6(1)(a) of the GDPR): in situations where no other legal basis for processing applies, DATAWALK may ask you to consent to the processing of your personal data. In such cases, your data will be processed to the extent and for the purpose specified in this consent:
 - in particular - with the consent of the job candidate – personal data will be processed for the purpose of future recruitment processes;
 - in the case of recruitment aimed at concluding an employment contract, the provision by the candidate (e.g., in a CV or cover letter) of personal data beyond the scope specified in Article 22¹ of the Labor Code, and also - when recruitment is aimed at concluding a civil law contract, the provision by the candidate of data other than that necessary to take action prior to the conclusion of the contract and to conclude the contract, means consent to its processing by DATAWALK for the purpose of conducting the recruitment process;
 - if your personal data is or will be processed on the basis of consent, this consent may be withdrawn at any time, and the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

3. Data source

In most cases, personal data is obtained directly from you as a job applicant.

It may also happen that personal data will be provided to us by entities supporting our recruitment processes, whose services are also used by the candidate (e.g., recruitment portals such as pracuj.pl).

We may also obtain your personal data through the LinkedIn portal, where the job candidate has a user profile, e.g., as a result of publishing or sending data through the services offered by LinkedIn (e.g., filling out contact forms, sending CVs).

4. Obligation to provide personal data

You are required to provide personal data to the extent specified in Article 22¹ of the Labor Code, for the purpose of carrying out activities aimed at concluding an employment contract, including taking all necessary steps prior to its conclusion. Failure to provide the required personal data, depending on the circumstances, may constitute an obstacle or hindrance to the recruitment process. Providing other personal data is voluntary, but failure to do so may affect your application.

Providing personal data is voluntary, if personal data is collected on the basis of your consent.

5. Conditions for transferring data to third parties

Personal data will not be disclosed to other entities. It may be entrusted for processing to entities whose services are used by DATAWALK (pursuant to Article 28 of the GDPR) in connection with its processing, e.g., entities supporting recruitment, entities providing IT infrastructure to the Controller.

6. Data transfer to third countries

As indicated in this information clause, we may use the services of third parties (processors) in connection with data processing, in particular the services of entities providing IT infrastructure. If we use the services of third parties outside the EEA (in the case of entities providing IT infrastructure – most often from the US) or allow third parties to use the services of further processors (sub-processors) to process personal data outside the EEA (most often this applies to entities providing IT infrastructure), except where processing takes place in a country providing an adequate level of protection (in accordance with current European Commission guidelines), we ensure in advance that a legal mechanism providing adequate safeguards is in place, such as standard contractual clauses approved by the European Commission, in accordance with applicable regulations.

Detailed information on the transfer of personal data to third countries, the safeguards applied, and a copy of such safeguards can be obtained by contacting us using the contact details provided in this clause.

7. Data storage period

Personal data is stored in accordance with the provisions of law regarding data retention periods. The data will be stored for the duration of the recruitment process. If you consent to the processing for the purposes of future recruitment processes, until you withdraw your consent or until the end of the calendar year following the year in which you consented to such processing, whichever occurs first.

8. Profiling

Data is not subject to automated decision-making and profiling processes.

9. Your rights

You have the following rights to the extent and under the conditions set out in applicable law:

- access data and obtain copies thereof;
- rectify your data;
- erase your data (“right to be forgotten”);
- restrict processing;
- transfer your data;
- lodge a complaint with a supervisory authority (the President of the Personal Data Protection Office);
- object to the processing of your data, including profiling, if: (i) there are grounds related to your particular situation, and (ii) the processing is based on the legitimate interest of DATAWALK (pursuant to Article 6(1)(f) of the GDPR).

If you want to ask a question or exercise any of your rights, you can contact DATAWALK using the contact details provided in this information clause.

10. Consent to data processing in future recruitment processes

If you are interested in participating in future recruitment processes conducted by DATAWALK, please include a clause in your application consenting to the processing of your personal data for these purposes in the future, e.g., with the following wording:

"I consent to the processing by DataWalk S.A. of my personal data provided in this application for future recruitment purposes."