

EUWORKERS.EU PRIVACY POLICY

Version of 11-01-2019

APPENDIX 1

TO THE TERMS AND CONTIDIONS OF USE OF THE PORTAL WWW.EUWORKERS.EU FOR CANDDDIDATES
TO THE TERMS AND CONTIDIONS OF USE OF THE PORTAL WWW.EUWORKERS.EU FOR EMPLOYERS

PRACUJ W UNII – EUROPA SP. Z O.O. (hereinafter referred to as „PRACUJ W UNII”) spares no effort to protect privacy of Users, Recipients and Clients of its Portal. This document specifies privacy policy of PRACUJ W UNII, owner of portal www.euworkers.eu. Visiting the Portal EUWORKERS you accept conditions specified in this document.

In Privacy Policy we use 5 following terms which refer respectively:

Service Provider, PRACUJ W UNII, PWU, we, our – PRACUJ W UNII - EUROPA SP. Z O.O. with its registered office in Wrocław, 136A Nenckiego street entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław-Fabryczna, VI Commercial Department of the National Court Register under no. 0000509786, holding Tax Identification Number (NIP) 899-27-54-745.

Service, Portal – the Internet portal www.euworkers.eu.

User, you – a natural person of age, who uses functionalities offered by Service Provider’s Portal which do not require the registration or logging-in.

Recipient, Candidate – a natural person of age, who owns an account on the Portal and uses the Services provided by electronic means by the Service Provider.

Customer/Employer – companies which post Job advertisements on the Portal and have Customer/Employer Account

Job advertisement – advertisement published on the portal www.pracujwunii.pl

GDPR, General Data Protection Regulation – Regulation of the European Parliament and of the Council (EU) 2016/679 of 27/04/2016 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/WE (General Data Protection Regulation)

Terms and Conditions – Terms and Condition of www.euworkers.eu for candidates and employers

1. Who is the controller of your personal data?

The controller of your personal data is PRACUJ W UNII – EUROPA SP. Z O.O. with its registered office in Wrocław, 136A Nenckiego street.

2. How to contact us to obtain more information about processing personal data?

Send the message to us:

- a) at e-mail address: gdpr@euworkers.eu
- b) use our contact form www.pracujwunii.pl/kontakt

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- c) by post to the address PRACUJ W UNII – EUROPA Sp. z o.o., 136A Nenckiego street, 52-223 Wrocław
- d) contact due to protection of personal data: gdpr@euworkers.eu

3. How do we process the data?

Due to the fact that we provide various kind of services for different group of users, below we describe each case specifying the purpose and the scope of processed data and their legal basis.

SERVICES FOR CANDIDATES

a) Applying for job advertisements

- Type of data: e-mail address, first name, surname, date of birth, knowledge of foreign languages, native language, holding a driving license, data included in attached CV documents and certificates, messages from the employer
- Purpose of processing data: providing services consisting of enabling candidates to apply for job advertisements on PWU; applying for a candidate (both logged-in and not logged-in users) for a job advertisement of employers; forwarding messages from the candidate to the employer
- The legal basis: Article 6(1)(b) of the General Data Protection Regulation
 - Do we share the data? Yes – with Employers (who have the account on our Portal) with job advertisements which one applied for. The list of employers is available here: www.euworkers.eu/check-employer/

b) Candidate Account

- Type of data: e-mail address, password encrypted in the system, first name, surname, date of birth, phone number, native language, information about the profession and years of experience, knowledge of foreign languages, holding a driving license, data included in attached CV documents, certificates and multimedia
- Purpose of processing data: creating an account, using the portal as a logged-in user - the Candidate
- The legal basis: Article 6(1)(b) of the General Data Protection Regulation
- Do we share the data? No

c) Suggesting CV to employers (Suggested Candidates Service)

- Type of data: e-mail address, first name, surname, date of birth, phone number, native language, information about the profession and years of experience, information about profession which one applied for or were set on candidate account, knowledge of foreign languages, holding a driving license, data included in attached CV documents, certificates and multimedia, consent of the person
- Purpose of processing data: suggesting candidates to employers – matching candidates with the use of information about their profession to job advertisements posted on the portal by an employer.
- The legal basis: Article 6(1)(a) of the General Data Protection Regulation
- Do we share the data? Yes – with Employers who have the account on the Portal and use this service. The list of employers is available here: www.euworkers.eu/check-employer/

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d) Sending e-mail messages with job advertisements

- Type of data: e-mail address, first name, surname, information about profession which one applied for, the consent to receive job advertisements, phone number, the consent to receive commercial information, position
- Purpose of processing data: sending messages containing job advertisements
- The legal basis: Article 6(1)(a) of the General Data Protection Regulation
- Do we share the data? No

e) Communication referring to service providing

- Type of data: e-mail address, first name, surname, reason and content of the message, sending date
- Purpose of processing data: sending messages and information relating to PWU (information about stages of delivering services, changes in Terms and Conditions, new functionalities, validations and warnings)
- The legal basis: Article 6(1)(b) of the General Data Protection Regulation
- Do we share the data? Yes – under justified circumstances with supervisory authorities in case of the control or documentation of validations

f) Enabling logging in and registering on the Portal via Facebook

- Type of data: e-mail address, first name, ID number of the candidate on the portal
- Purpose of processing data: enabling logging in and registering on the PWU portal (only on a candidate account) via Facebook
- The legal basis: Article 6(1)(a) of the General Data Protection Regulation
- Do we share the data? No

g) Ordering Euro-Tax.pl service

- Type of data: e-mail address, first name, phone number
- Purpose of processing data: downloading and communicating data of parties interested in Euro-Tax.pl service in order to undertake the cooperation with Euro-Tax.pl
- The legal basis: Article 6(1)(a) of the General Data Protection Regulation
- Do we share the data? Yes – with Euro-Tax.pl Zwrot Podatku S.A., 2-8/1 Sikorskiego street, 53-659 Wrocław

We inform that personal data specified above may be also processed to realize legitimate interests of PWU which are the internal analysis, internal control, internal reports relating to service providing or processing operations and demonstrating compliance with law regulations. The legal basis of such processing is Article 6(1)(f) of the General Data Protection Regulation.

SERVICES FOR EMPLOYERS

h) Employer Account

- Type of data: e-mail address, password encrypted in the system, company name, company name displayed on the portal, phone numbers, web address, company address, registration numbers (NIP, Regon, KRAZ)
- Purpose of processing data: creating an account, using the portal as a logged-in user - the Employer
- The legal basis: Article 6(1)(b) of the General Data Protection Regulation

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- Do we share the data? Yes – under justified circumstances with supervisory authorities in case of case of gross violations or on suspected offences
- i) Employer's Business Card**
- Type of data: company name, phone numbers, web address, company address, registration numbers (NIP, Regon, KRS, KRAZ), descriptive content posted by the employer, data contained in multimedia files and data contained in scanned documents attached by employer
 - Purpose of processing data: making data of employers (who have active accounts on the portal and posted at least job advertisement) public for other users of the portal
 - The legal basis: Article 6(1)(b) of the General Data Protection Regulation
 - Do we share the data? Yes – at www.euworkers.eu
- j) Employer Verification**
- Type of data: e-mail address, company name, phone numbers, web address, company address, registration numbers (NIP, Regon, KRAZ), descriptive content posted by the employer, data contained in multimedia files and data contained in scanned documents attached by employer
 - Purpose of processing data: verifying the validation of data given while registering the employer with the official registers
 - The legal basis: Article 6(1)(f) of the General Data Protection Regulation
 - Do we share the data? Yes – under justified circumstances with supervisory authorities in case of case of gross violations or on suspected offences
- k) Invoicing, issuing pro-forma invoices**
- Type of data: e-mail address, company name, phone numbers, company address, NIP registration number, language, currency, content specified on the invoice or pro-forma invoice
 - Purpose of processing data: automatic issuing invoices, pro-forma invoices in the employer dashboard
 - The legal basis: Article 6(1)(b) of the General Data Protection Regulation
 - Do we share the data? Yes – under justified circumstances with supervisory authorities
- l) Online payment and card payment**
- Type of data: e-mail address, first name, surname, currency, amount, payment title, payment method (selected bank or card payment)
 - Purpose of processing data: enabling payment for the services for employers on the portal
 - The legal basis: Article 6(1)(b) of the General Data Protection Regulation
 - Do we share the data? Yes – (e-mail address, payment title and amount) to entities realizing the payment online and with a card
- m) Customer service of the Employer and communication with him**
- Type of data: e-mail address, company name, phone number
 - Purpose of processing data: customer service, sending information referring activities of the portal and promoting its services
 - The legal basis: Article 6(1)(b) of the General Data Protection Regulation
 - Do we share the data? No
- n) Chat with the user of the portal in the Employer section on the portal**

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- Type of data: e-mail address, first name and surname
- Purpose of processing data: servicing the chat with the user; providing immediate help for employers referring to portal services
- The legal basis: Article 6(1)(f) of the General Data Protection Regulation
- Do we share the data? No

We inform that personal data specified above may be also processed to realize legitimate interests of PWU which are the internal analysis, internal control, internal reports relating to service providing or processing operations and demonstrating compliance with law regulations. The legal basis of such processing is Article 6(1)(f) of the General Data Protection Regulation.

SERVICES FOR USERS OF THE PORTAL, CANDIDATES AND EMPLOYERS

o) Contact Form

- Type of data: e-mail address, first name, surname, phone number
- Purpose of processing data: enabling the correspondence with PWU via the contact form; continuing the communication via mailing software
- The legal basis: Article 6(1)(f) of the General Data Protection Regulation
- Do we share the data? No

p) Sending marketing messages

- Type of data: e-mail address, first name, surname, company name, address, reason and content of communication, sending data
- Purpose of processing data: sending marketing and promoting messages and information referring to PWU
- The legal basis: Article 6(1)(a) of the General Data Protection Regulation
- Do we share the data? Yes, to mailing or delivery service providers in case of using this form of delivery.

q) Mailing of the partners

- Type of data: e-mail address, first name, surname, company name; position, country, native language, phone number, the consent to receive commercial information
- Purpose of processing data: sending messages ordered by PWU partners
- The legal basis: Article 6(1)(a) of the General Data Protection Regulation
- Do we share the data? No

r) Web push notifications

- Type of data: cookies of the user: IP address of the person (only in case when IP is assigned to a specific person and not to the service provider), type of browser, operating system and the type of device, time of server enquiry, data referring to visited sites on PWU portal
- Purpose of processing data: enabling users to use the function of web push notification (also in accordance to automatic profiling based on visited sites). Notifications of nature promoting services of PWU and its partners.
- The legal basis: Article 6(1)(a) of the General Data Protection Regulation
- Do we share the data? No

s) Displaying advertisements

On PWU portal:

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- Type of data: cookies of the user specified here: <https://policies.google.com/technologies/types?hl=pl>; more information: <https://policies.google.com/technologies/partner-sites>
 - Purpose of processing data: displaying advertisements of external advertisers to users of the portal
 - The legal basis: Article 6(1)(a) and Article 6(1)(f) of the General Data Protection Regulation
- On other portals (remarketing)
- Type of data: cookies of the user (in pseudonymized form): cookie ID, passworded e-mail addresses, mobile advertisements ID, other technical identifications which allow an individual behavior to be differentiated without direct identification of persons; cookies used by Google – source: <https://policies.google.com/technologies/types?hl=pl>; <https://policies.google.com/technologies/partner-sites>; e-mail address, first name, surname, information about the position (for which one applied or looks for a job); data collected by Facebook in a scope specified there: <https://www.facebook.com/about/privacy/>
 - Purpose of processing data: displaying PWU offers to the Internet users (on other sites)
 - The legal basis: Article 6(1)(a) or Article 6(1)(f) of the General Data Protection Regulation
 - Do we share the data? Yes – with Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland
- t) Communications with the user of the Portal via Facebook Messenger**
- Type of data: first name, surname, Facebook login, content of the conversation, files sent during the conversation
 - Purpose of processing data: enabling the communication with the user of the portal via Facebook Messenger on PWU portal
 - The legal basis: Article 6(1)(a) of the General Data Protection Regulation
 - Do we share the data? Yes – Facebook Inc., Menlo Park, California, USA, other users of Messenger being the part of the conversation
- u) Monitoring users of the Portal in order to improve the functionality of the Portal and to increase the security**
- Type of data: cookie of the user: IP, browser data (location and language); data collected by the analytical tool Hotjar (more: <https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookies>); data collected by portal Google Analytics (cookies named: _utma, _utmb, _utmc, _utmz, oraz _utmv; more information: <https://policies.google.com/technologies/partner-sites>); data collected by Facebook (data from Pixel)
 - Purpose of processing data: monitoring users of the portal and their actions on the website with the use of tools: Google Analytics, Facebook Pixel and HotJar in order to improve the functionality of the Portal and to increase the security
 - The legal basis: Article 6(1)(a) or Article 6(1)(f) of the General Data Protection Regulation
 - Do we share the data? Yes – Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Facebook Inc., Menlo Park, California, USA
 - The mechanisms of users profiling were employed, however they shall not be the basis causing legal effects concerning users.

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- The mechanisms allowing anonymization of data were employed. When possible, data are anonymized within the European Union.
4. **Do we transfer your data to countries from outside the European Economic Area?**
Your personal data may be transferred outside the European Economic Area to Employers in order to deliver the service based on the legal basis of the General Data Protection Regulation. Your personal data may be transferred outside the European Economic Area to our suppliers in accordance to proper security specified in Article 46(2) of the General Data Protection including:
- decision of the European Commission about ensuring the proper level of security within the territory of the country, sector or organization in this country.
 - the standard contractual clauses approved by European Commission,
 - legally binding and enforceable instruments between public authorities and public bodies (e.g. Privacy Shield EU-US (IP/16/216)).
5. **How long do we store your personal data?**
We store your data for the duration of the contract concluded with you. After expiration of the contract we keep your data for the period of 3 years as well as to claims referring to the use of our services. Data relating to Employer Account service on PRACUJ W UNII we store for the period of 6 years to fulfill obligations arising by law including the area of accounting and taxation.
6. **What rights do you have in accordance to data processing?**
We provide realizing the laws referring to processing your personal data. Your demands in the accordance to following rights can be reported to us by sending a message at e-mail address: gdpr@euworkers.eu
- a) **the right of access to data** – you have the right to obtain from us the information if your personal data are processed. If so, you have the right to gain the access to them and obtain information about purposes of the processing, categories of personal data, receivers or categories of receivers, expected duration of the storage, source of obtaining your data, automated method of decision making, including profiling, transferring data to the third party and securities connected with that. You can obtain the copy of your personal data which are being processed.
- b) **the right of personal data rectification** – you have the right to rectify your personal data which are incorrect and to complete data which are incomplete. You can do it by yourself in the settings of your account or by sending the message at the e-mail address: gdpr@euworkers.eu.
- c) **the right of data erasure** – you have the right to demand erasure of all your personal data if:
- your data are no longer necessary for the purposes they were collected or processed,
 - you withdrew the consent which was a basis for processing them,
 - you raised the objection to processing your data for marketing purposes,
 - your personal data are processed unlawfully
- d) **the right of restricting the processing of personal data** – you have the right to demand restriction on the processing in following cases:
- if you question the correctness of personal data – then we restrict the use of your data for the duration of validating them, no longer than 7 days,
 - if the processing of your data is unlawfully and you refuse to delete them, in return demanding restriction on using them,

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- if your data are no longer necessary for us, but are necessary for you until the time of establishment, enforce or defense of legal claims,
 - if you objected to the processing for the duration of validation if the basis of your objection takes the precedence over our legitimate basis.
- e) **the right to data portability** – you have the right to obtain all the data which you provided us with and then transfer them to any controller of your choice. You have the right to demand transferring the data by us directly to the new controller as long as it is technically possible.
- f) **the right of objection to the use of the data** – you have the right to object to the use of your personal data processed to deliver justified purposes of PWU (processed on the legal basis of the Article 6(1)(f) of the General Data Protection Regulation), e.g. in order to send notifications referring to delivering the service (new services or functionalities), monitoring, profiling, conducting internal analysis, internal control, internal reports relating to service providing or processing operations and demonstrating compliance with law regulations. Raising such objection will affect in terminating the processing unless PWU will prove legitimate and justified basis of further processing.
- g) **the right of withdrawal of the consent** – you have the right to withdraw any previously given consent for processing your personal data. Withdrawing the constant will affect in immediate terminating of processing personal data which were processed on the basis of this consent. It will not affect processing the data which was realized before withdrawing the consent. If you withdraw the consent for processing data it may occur that using some of the functionalities of the Portal will not be possible.

7. How do we realize your rights?

According to the laws in force the duration of realizing demands may be up to 1 month. In case of the complicated nature of the demand or increased amount of demands the duration can be extended to 3 months. In case of such extension, we will inform you about it. The correspondence referring to realizing your request will be archived and stored for reasons of proof.

Information clause of realizing your rights:

- The controller of your personal data of persons who request realizing their rights arising from the General Data Protection Regulation is PRACUJ W UNII – EUROPA SP. Z O.O., 136A Nenckiego street, Wrocław.
- Data are processed in order to provide the realization of demands of the person whose data are processed in order to demonstrate compliance with provisions of law.
- Depending on the processing operation applied to the demand of correct realization of the demand it is required to process various sets of personal data. These data can involve: first name and surname of the person, identification data (e.g. e-mail address, date of birth); contact data (e-mail address); information related to the realization of the demand or request (e.g. reference number, processing context, processing activities, date, content, undertaken actions, decision on the demand or request).
- The legal basis of such processing is Article 6(1)(c) which means that processing is necessary for compliance with a legal obligation (is Article 6(1)(c)) and to realize our

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legitimate interests which is order to demonstrate compliance with provisions of law (Article 6(1)(f)).

- We inform that personal data given in order to realize this demand will be stored for reasons of proof for a period of 5 years following the end of the year when the demand or request was received.
- The person concerned shall have the right to demand the access to his personal data, in many cases also the right to demand the correction of his personal data, deleting his personal data, limitation of processing his personal data and the right to transfer them. The person concerned has also the right to rise a complaint the supervisor authority.
- The person concerned has the right to object to the processing if collection and using of data is based on our legitimate interests. In such case we will cease further processing of personal data relating to the objection unless we are able to show legitimate grounds to process them further. All questions shall be addressed at: gdpr@euworkers.eu.

8. How do we protect your data?

We take every effort to provide the security of your personal data. Data are protected against loss, damage, disclosure, unauthorized access and misuse. Forms and the process of logging in is realized with the use of SSL encrypted transmission which significantly hampers the interception of the access to your data.

9. Liability

This Privacy Policy relates to the users of the portal www.euworkers.eu.

PRACUJ W UNII shall not be responsible for processing the data by other entities including servers and internet portals (also internet websites of employers advertising on PWU) on which the user is redirected. Please read the detailed provisions on the protections of these entities.

PRACUJ W UNII shall not also be responsible for the content posted by third-party persons and companies in particular in the form of job advertisements, educational offers, candidates' profiles, Recipient Account etc. PRACUJ W UNI shall not also be responsible for content on the portal which is not owned by it that can be linked in aforementioned content.