

## Candidates privacy information statement

### I. Controller

The controller of your personal data is Devapo sp. z o. o. with its registered office in Warsaw ("Controller" or "we", "us") entered into the Register of Entrepreneurs of the National Court Register by the District Court for the Capital City of Warsaw in Warsaw XIII Commercial Division of the National Court Register under no. 0000762836.

If you have any questions regarding the processing of your personal data or your rights, contact:

- by correspondence: Aleje Jerozolimskie 100, 00-807 Warsaw or by e-mail [contact@devapo.io](mailto:contact@devapo.io) or
- with our data protection coordinator by email to: [hr@devapo.io](mailto:hr@devapo.io).

### II. Source

We process your personal data obtained directly from you (e.g. data provided in the form, CV). As part of the recruitment process, we may collect your publicly available data from LinkedIn. It is information about your education, professional experience, positions held or knowledge of foreign languages that you have published on this portal.

### III. Purposes and grounds for data processing and scope of personal data

Personal data is processed:

- if the preferred form of employment is an employment contract – to perform obligations arising from the law related to the employment process, including primarily the Labor Code – the legal basis for processing is the legal obligation incumbent on the Controller (Article 6.1. c GDPR in connection with the provisions of labor law)
- if the preferred form of employment is a civil law contract – to conduct the recruitment process – the legal basis for the processing of data contained in the application documents is to act before concluding the contract at the request of the data subject (Article 6.1. b GDPR)
- to carry out the recruitment process in the scope of data not required by law or by the Controller, as well as for the purposes of future recruitment processes – the legal basis for processing is consent (Article 6.1. a GDPR)
- to verify the qualifications and skills of the candidate and to determine the terms of cooperation – the legal basis for data processing is the legitimate interest of the Controller (Article 6.1. f GDPR). The legitimate interest of the Controller is to verify candidates for work and determine the terms of possible cooperation
- to establish or pursue by the Controller any claims or defend against claims directed against the Controller – the legal basis for data processing is the legitimate interest of the Controller (Article 6.1. f GDPR)

As part of recruitment processes, personal data should be transferred (e.g., in a CV) only to the extent specified in the provisions of labor law. If the submitted applications contain additional data beyond the scope indicated by the provisions of labor law, their processing will be based on the candidate's consent (Article 6.1. a GDPR).

#### **IV. Period of personal data processing**

We process your personal data:

1. in order to conduct recruitment for the position to which your recruitment application relates: for the period necessary to conduct the recruitment process and select a candidate, and then for a period of 4 months in case the Controller has to repeat the recruitment process for any reasons, but not longer than for a period of 1 year from the submission of the recruitment application;
2. for other, similar positions: for a period of 2 years from the submission of the recruitment application, if you agree to the processing of your personal data for the purposes of future recruitments.

In the event of a positive recruitment result, we further process your personal data based on the rules and periods of data processing provided for employees, which will be provided to you after starting work.

#### **V. Transfer of personal data**

We transfer your personal data to the following categories of entities:

1. Entities processing your personal data who act on our behalf – service providers who support us in conducting recruitment processes (recruitment management providers, recruitment portals, IT system deliveries);
2. authorized state authorities, if such an obligation results from applicable law.

#### **VI. Transfer of personal data to third countries**

We process your personal data only within the European Economic Area (EEA). If we make changes in this regard in the future, we will provide you with additional information.

#### **VII. Decisions taken in an automated manner**

We do not process your personal data in an automated manner, which may result in automated decision-making, including decisions based on profiling.

#### **VIII. Your rights**

- Right to access and obtain a copy of your personal information. You are entitled to request confirmation whether we process any of your personal information. Where this is the case, you have the right to access to some of your personal information and to certain information about how it is processed. In some cases, you can ask us to provide you with an electronic copy of your information. In some limited circumstances, you also have the right to request portability of your personal information, which means, we will provide them to a third party upon your request.

- Right to correct your personal information. If you can demonstrate that personal information we hold about you is not correct, you can request that this information is updated or otherwise corrected.
- Right to delete/right to be forgotten. In certain circumstances you have the right to request that your personal data is deleted. You can make such a request at any time and we will evaluate if your request should be granted, however this right is subject to any legal rights or obligations where we need to retain data. For situations where in accordance with the law, we determine that your request to have your personal information deleted must be granted, we will do so without undue delay.
- Right to restrict. In certain circumstances, you have the right to restrict the processing of your personal data.
- Right to object. As far as the Controller's processing of your data is based on the controller's legitimate interest (and no other processing ground) or relates to direct marketing, you are entitled to object to the Controller processing your data by reference to your particular situation.
- Finally, you have the right to lodge a complaint with the data protection authority which in Poland is the President of the Personal Data Protection Office.