

PRIVACY POLICY OF GRUPA PRACUJ

applicable as of **1 December 2018**

The Privacy Policy of Grupa Pracuj were executed in the Polish and English language. In case of any discrepancies between the Polish language version and the English language version, the Polish language version shall prevail.

Grupa Pracuj sp. z o.o. — the owner of the Pracuj.pl web portal endeavors to protect the privacy of users of its websites addressed to employers (**professional relations**).

In order to implement the rule of lawful, reliable and clear processing of your personal data while using our websites, we have prepared for you this document called the Privacy Policy.

This Privacy Policy defines the manner in which we protect your personal data and your rights.

The Privacy Policy for users of websites belonging to Grupa Pracuj sp. z o.o. and addressed to job-seekers (candidates) can be found at: <https://grupapracuj.pl/polityka-prywatnosci>

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I. WHAT TERMS DO WE USE IN OUR PRIVACY POLICY?

Grupa Pracuj, we, our, ours	is Grupa Pracuj sp. z o.o. with its registered office in Warsaw, at ul. Prosta 68, 00-838 Warszawa (Warsaw, Poland), e-mail address: biuro@pracuj.pl , telephone number: (22) 373 73 00.
Client	is a legal entity, an organizational unit not having legal personality or a sole proprietorship using the Websites under a Contract concluded with Grupa Pracuj.
Employer's Account	is the Client's account available at https://dlafirm.pracuj.pl and https://sklep.pracuj.pl and used for placing orders and managing recruitment advertisements published via the Pracuj.pl Store.
Partners of Grupa Pracuj	are entities offering services addressed to individuals professionally involved in recruitment processes or Human Resources management, who signed a contract of cooperation with Grupa Pracuj.
GDPR	is the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation — GDPR).
Website Websites	or are websites belonging to or managed by Grupa Pracuj and addressed to employers, within which Grupa Pracuj offers its Services, including: https://strefa.pracuj.pl , https://sklep.pracuj.pl , https://dlafirm.pracuj.pl , https://jobicon.pracuj.pl , https://www.wyzwaniahr.pl/ , https://www.akademiapracuj.pl/
Pracuj.pl Store	is an online sales channel of services of Grupa Pracuj available at: https://dlafirm.pracuj.pl and https://sklep.pracuj.pl
Companies affiliated with Grupa Pracuj	related by equity or personal relations with Grupa Pracuj, i.e. (1) eRecruitment Solutions sp. z o.o., as well as other companies, whose currently valid list is available here .
Strefa Pracuj.pl	is a system of Grupa Pracuj available at https://strefa.pracuj.pl , enabling the Client to independently control and manage the recruitment processes related to the publication of a recruitment ad, according to the rules set forth in the Contract. Grupa Pracuj grants credentials (login and password) to Strefa Pracuj.pl.

Contract	is a contract concluded between the Client and Grupa Pracuj (in the form of an order or an individual agreement) through any sales channel offered by Grupa Pracuj (e.g. by accepting an order in the Pracuj.pl Store), including a contract for providing advertising services defining the terms and conditions of providing the services by Grupa Pracuj for the Client, as well as the rights and responsibilities of the parties.
Services	are all services provided by Grupa Pracuj for the Client under the Contract, including particularly, without limitation, publishing recruitment advertisements, granting access to Strefa Pracuj.pl, granting access to the Employer's Account and advertising services.
User	is every natural person using the resources contained on the Websites.

II. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA AND HOW CAN YOU CONTACT THE DATA CONTROLLER?

Grupa Pracuj is the data controller with respect to your personal data.

If you grant your consent to being sent marketing and commercial information by companies affiliated with Grupa Pracuj, each such company affiliated with Grupa Pracuj becomes a data controller with respect to your personal data. Detailed information about the companies affiliated with Grupa Pracuj, including their contact data, can be found [here](#).

In case of any questions regarding processing of your personal data by Grupa Pracuj and companies affiliated with Grupa Pracuj and your rights, contact us:

- a) at the address: zgody@pracuj.pl or
- b) via our Data Protection Officer at the address: iod@pracuj.pl

[More information on your rights can be found in section VI below.](#)

III. WHAT PERSONAL DATA DO WE PROCESS AND WHAT ARE THE PURPOSES AND LEGAL BASIS OF SUCH PROCESSING?

We process your personal data as the data of: (i) a Client or its representative, (ii) a prospective Client or its representative, or (iii) a User, for diverse purposes, to diverse extent and on diverse legal basis defined in the GDPR. In order to provide you with clear information, we categorized such information according to the purposes of processing your personal data.

1. CONTRACTS WITH GRUPA PRACUJ

Conclusion, performance and settlement of Contracts / carrying out tax and accounting obligations / debt recovery and claims

Purpose. We process your personal data to: (i) conclude, perform and settle Contracts, (ii) carry out our tax and accounting obligations related to the proper Contract performance, including issuing and delivering invoices or e-invoices to you, (iv) contractual debt recovery, and (iv) establish, exercise or defend against legal claims resulting from a failure to perform or inadequate performance of Contracts.

Scope of data. We process your personal data (of a Client or its representative) submitted upon placing your order /concluding a Contract, as well as any data provided to your Account Manager upon concluding the Contract. Such data include: your first and last names, postal address, business e-mail address, business telephone number, position and place of work, NIP and REGON numbers, your voice (if the Contract was concluded via our telephone sales channel), as well as any data defining the manner you access our Services, including the level of user rights enabling access to specific systems of Grupa Pracuj (e.g. Strefa Pracuj).

Legal basis. (1) Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in establishing and maintaining business relations with Clients acting via their representatives, including proper determination of the amount of fees the Clients are obliged to pay for using our Services, contractual debt recovery and establishing, exercising or defending against legal claims in proceedings before courts and other state authorities in relation with concluding and performance of Contracts; (2) fulfilling the legal obligations by Grupa Pracuj (Article 6 sec. 1 item c of the GDPR) resulting from the tax laws (including, inter alia, the Tax Ordinance act of 29 August 1997) and the laws related to accountancy (including, inter alia, the Accounting Act of 29 September 1994). If you are a sole proprietor and our Client, we also process your personal data in order to conclude, perform and settle the Contract (Article 6, sec. 1 item b of the GDPR).

Retention period. For purposes related to conclusion and performance of Contracts, including debt recovery and establishing, exercising or defending against legal claims arising out of the concluded Contracts, we process your personal data generally for the duration of the respective Contract and for 3 years after its expiry or termination. In specific circumstances, we can process your data for a longer time, when it is required by applicable law. For purposes related to fulfilling tax and accounting obligations, we process your personal data for 5 years from the end of the calendar year during which the tax payable by Grupa Pracuj was due, and for a longer time, if the limitation period of the tax obligation is suspended or interrupted or when such a necessity arising out of applicable laws.

2. PRACUJ.PL STORE

Creating an Account and User authentication in the Pracuj.pl Store

Purpose. We process your personal data in order to create an Employer's Account in the Pracuj.pl Store and authenticate the User in the Pracuj.pl Store.

Scope of data. We process your personal data provided in the registration form in order to create an Employer's Account (including your first and last names, an e-mail address, a telephone number, details of the company you represent as a User), a username in the form of an e-mail address and a password you set up upon creating your Employer's Account.

Legal basis. (1) Necessity to conclude and perform a Contract for the provision of service consisting of a free Employer's Account (Article 6 sec. 1 item b of the GDPR); (2) Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in establishing and maintaining business relations with Clients acting via their representatives, including their appropriate identification.

Retention period. For these purposes we process your personal data through the entire period of the Employer's Account availability and using our Services in the Pracuj.pl Store, as well as for the period of 3 years after disabling the Employer's Account in order to establish, exercise or defend against legal claims related to using the Employer's Account. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

Monitoring the activity in the Pracuj.pl Store

Purpose. We process your personal data for the purposes of development and optimization of using the Pracuj.pl Store (e.g. in order to introduce additional functionalities improving the comfort of using the Pracuj.pl Store), as well as to present you with contents matching your needs and preferences and other marketing purposes described below in sections III.5 and IV ([Marketing of our services](#) and [Profiling of your preferences and interests](#)).

Scope of data. We process data related to your activity in the Pracuj.pl Store, including particularly, without limitation, the amount of time you spent on our Website, the features you used, the actions you undertook and the Services you ordered, including the history of your published advertisements and orders, your IP address, location, device ID and credentials to the Pracuj.pl Store.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in the development of the Pracuj.pl Store, including improving its specific functionalities and adjusting them to the Users' needs.

Retention period. For these purposes we process your personal data through the entire period of the Employer's Account availability and using our Services in the Pracuj.pl Store. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

Communication with Users of the Pracuj.pl Store

Purpose. We process your personal data in order to answer your questions about the Pracuj.pl Store and our Services provided via the Pracuj.pl Store, as well as to solve the reported problems related with using the Pracuj.pl Store.

Scope of data. We process your personal data provided to an online consultant, including your first and last names, a telephone number, an e-mail address, the contents of the communication with the consultant.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in facilitating contact with the Users and encouraging them to use our services provided via the Pracuj.pl Store.

Retention period. For this purpose we process your personal data through the entire period of the Employer's Account availability and using our Services in the Pracuj.pl Store. If you only asked a question and you do not use our Services, we can process your personal data for not longer than 3 years from receiving your question/issue. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

3. USING STREFA PRACUJ.PL Ensuring security/using the functionalities of Strefa Pracuj.pl

Purpose. We process your personal data for the purposes of User authentication in Strefa Pracuj.pl and enabling you to use various functionalities of Strefa Pracuj.pl in accordance with user access rights set forth in the Contract, as well as for the purposes of communication regarding the use of Strefa Pracuj.pl.

Scope of data. We process your personal data, including: (i) your username (set up upon granting access rights to Strefa Pracuj.pl) and password you create upon logging into Strefa Pracuj.pl, (ii) data related to your use of the functionalities of Strefa Pracuj.pl, as well as (iii) the data contained in the communication with our consultant on using Strefa Pracuj.pl.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in ensuring safety and access control to Strefa Pracuj.pl, as well as enabling the use of specific functionalities of Strefa Pracuj.pl and appropriate communication with Users. If you are a sole proprietor and our Client, we provide you with access to Strefa Pracuj.pl in order to conclude, perform and settle the Contract (Article 6, sec. 1 item b of the GDPR).

Retention period. For these purposes we process your personal data through the period of using (having access rights to) Strefa Pracuj.pl, however not longer than for 3 years from the date of last logging into Strefa Pracuj.pl. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

Monitoring the activity in Strefa Pracuj.pl

Purpose. We process your personal data in order to develop Strefa Pracuj.pl, provide technical support for Strefa Pracuj.pl and keep statistics connected with the use of Strefa Pracuj.pl.

Scope of data. We process data related to your activity in Strefa Pracuj.pl, e.g. the information on how often and which functionalities of Strefa Pracuj.pl you use.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in the development of Strefa Pracuj.pl, including improving its specific functionalities.

Retention period. For these purposes we process your personal data through the entire period of using (having access rights to) Strefa Pracuj.pl, however not longer than for 3 years from the date of last logging into Strefa Pracuj.pl. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

4. USING OTHER WEBSITES

Access to training courses, reports and e-books

Purpose. We process your personal data in order to provide you with our original training materials, including articles, guidebooks, webinars, reports, as well as to enroll you for various training courses (webinars) we organize.

Scope of data. We process personal data you provided upon completing one of our online forms. Mandatory and optional fields are marked in our forms. Completing the fields marked as mandatory is required to use our Services.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in building trust to our knowledge and experience in the field of recruitment in professional relations (so called “*business-to-business*”), should you express your intention to participate in particular training courses or webinars or to receive e-books.

Retention period. For this purpose, we process your personal data for no longer than 3 years from the date of submitting a completed form. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

Newsletter

Purpose. We process your personal data in order to keep you informed about the events we organize, the training and promotional materials we create (such as articles, guidebooks, webinars and reports), the market research we conduct and the products and services we offer. Such information is distributed in the form of a newsletter.

Scope of data. Your e-mail address.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in the promotion of our initiatives in the field of recruitment in professional relations (so called “*business-to-business*”), should you grant your consent to being sent such information by e-mail in the form of a newsletter.

Retention period. For this purpose we process your personal data until you unsubscribe the newsletter. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

Competitions and promotional campaigns

Purpose. We process your personal data in order to conduct competitions, select winners and settle your participation in the competitions or promotional campaigns we organize, including handling complaints and pursuing claims related to conducting a particular competition or promotional campaign.

Scope of data. We process your personal data provided in the application form for the participation in a given competition or promotional campaign. Mandatory and optional fields are marked in the form. Completing the fields marked as mandatory is required to take part in a given competition or promotional campaign.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in promoting our products and Services by organizing specific competitions and promotional campaigns, should you express your interest in participating in such competitions and promotional campaigns. If you win a given competition, we will process your personal data also in order to fulfil tax obligations of Grupa Pracuj (Article 6 sec. 1 item c of the GDPR).

Retention period. For this purpose we process your personal data for the period of the competition or the promotional campaign and for the period not longer than 3 years from the end of a given competition or promotional campaign, including, inter alia, in order to pursue claims or defend against claim, related to a given competition or promotional campaign. If you win a given competition, we will process your personal data for the period of 5 years from the end of the calendar year during which the tax liability due to the award was payable in accordance with the provisions of the applicable tax law. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

5. MARKETING OF OUR PRODUCTS AND SERVICES

Purpose. We process your personal data in order to offer you our products and Services that most accurately match your professional interests or the needs of the employer you represent, including by sending you specific promotional materials and conducting satisfaction surveys on the quality of our Services.

Scope of data. We process your personal data, including: your first and last names, an e-mail address, a telephone number, the name and address of your employer and your position in the company, as well as your voice (if we contact you via our telephone sales channel), which you provided while completing one of the forms we employ in relation to: presentations of our Services, providing access to training courses, reports and e-books, satisfaction surveys, newsletter distribution, as well as the data you provided while contacting your Account Manager (during the telephone conversation) or while creating your Employer's account. Furthermore, we process your personal data acquired from public sources (e.g. your employer's website) and the data automatically collected by cookie files and related to your

activity on the Websites, such as the frequency of your visits, lists of the visited pages of the Websites and information on the downloaded educational materials.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) involve direct marketing of our own products and Services within professional (business-to-business). Furthermore, we will contact you by e-mail or telephone in order to market our products and Services, if you give your consent to be communicated by e-mail or telephone in order to receive such information from Grupa Pracuj or give your consent to being sent cookies by configuring appropriate settings of your web browser. Having considered our interests and your interests, rights and freedoms, we have decided not to overly interfere with your privacy, especially that our activities pertain solely to professional relations.

Retention period. For this purpose your personal data are processed until you resign from receiving marketing and commercial information by Grupa Pracuj (by withdrawing your consent or refusing to receive such information), however not later than through 3 years from the day of your last recorded activity in the online or offline marketing actions and events of Grupa Pracuj. Your activity means any actions that might indicate your interest in any services or marketing activities of Grupa Pracuj, such as participation in a marketing event (a conference, a training session, a satisfaction survey), opening an advertising e-mail message, visiting the website of Grupa Pracuj or using the services of Grupa Pracuj. During 3 years from your last activity, your personal data will no longer be actively processed, but will only be stored. After this period your personal data will be erased/anonymized.

More information on profiling can be found below in section IV ([Profiling your preferences and interests](#)).

6. MARKETING OF PRODUCTS AND SERVICES OF COMPANIES AFFILIATED WITH GRUPA PRACUJ AND PARTNERS OF GRUPA PRACUJ

Purpose. If you grant your consent to being sent marketing and commercial information by companies affiliated with Grupa Pracuj, such companies will process your personal data for the purposes of promotion of their products or services. If you grant your consent to being sent marketing and commercial information by partners of Grupa Pracuj, we will send you the information about products and services of those entities, but we will not make your personal data available to those entities.

Scope of data. Companies affiliated with Grupa Pracuj will process such data as: your first and last name, an e-mail address, a telephone number, the name and address of your employer and your position in the company, which you provided to Grupa Pracuj or which Grupa Pracuj collected according to the information specified in section III.5 above ([Marketing of our products and Services](#)). Such a scope of data will also be used for marketing activities of partners of Grupa Pracuj. **Legal basis.** (1) Legitimate interests of companies affiliated with Grupa Pracuj (Article 6 sec. 1 item f of the GDPR) involve direct marketing of their own products and services within professional (business-to-business) relationship, provided that you grant your consent to being contacted by e-mail or telephone to be provided marketing and commercial information by companies affiliated with Grupa Pracuj or to being sent cookie files by appropriate settings of your web browser used to view websites belonging to companies affiliated with Grupa Pracuj; (2) Our legitimate interests (Article 6 sec. 1 item f of the GDPR)

involve direct marketing of our own products and services within professional (business-to-business) relationship, provided that you grant your consent to being contacted by e-mail or telephone to be provided marketing and commercial information by partners of Grupa Pracuj. Having considered our interests and your interests, rights and freedoms, we have decided not to overly interfere with your privacy, especially that our activities pertain solely to professional relations and you have granted your consents to being sent marketing communication by us or companies affiliated with Grupa Pracuj related to the marketing of products or services of entities other than Grupa Pracuj.

Retention period. For this purpose your personal data are processed until you resign from receiving marketing and commercial information by companies affiliated with Grupa Pracuj or partners of Grupa Pracuj (by withdrawing your consent or refusing to receive such information), however not later than through 3 years from the day of your last recorded activity in the online or offline marketing actions and events organized by companies affiliated with Grupa Pracuj.

Your activity means any actions that might indicate your interest in any services or marketing activities of companies affiliated with Grupa Pracuj, such as participation in a marketing event (a conference, a training session, a satisfaction survey), opening an advertising e-mail message, visiting the website of companies affiliated with Grupa Pracuj or using the services of companies affiliated with Grupa Pracuj. During 3 years from your last activity, your personal data will no longer be actively processed, but will only be stored. After this period your personal data will be erased/anonymized.

More information on profiling can be found below in section IV ([Profiling your preferences and interests](#)).

7. STATISTICS OF USING PARTICULAR FUNCTIONALITIES OF WEBSITES, FACILITATION OF USING THE WEBSITES AND ENSURING INFORMATION SAFETY OF THE WEBSITES

Purpose. We process your personal data in order to develop the statistics of using particular functionalities of the Websites, facilitate the Use of the Websites and ensure information safety of the Websites.

Scope of data. We process personal data related to your activity on the Websites, such as: visited pages and subpages of the Websites and the time spent on each of them, as well as your search history, your IP address, location, the device ID and the data of your web browser and your operating system.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in facilitating the use of services online and improving the quality of those services.

Retention period. For this purpose, we process your personal data for no longer than 3 years. After this time, we either remove/anonymize your personal data or we process it further for a different purpose specified in this Privacy Policy.

8. ESTABLISHING, EXERCISING OR DEFENDING AGAINST CLAIMS

Purpose. We process your personal data in order to establish, exercise and defend against claims, including any claims arising from unauthorized use of the Websites.

Scope of data. We process your personal data, including: first and last names, an e-mail address, data related to the use of the Websites and other data, necessary for justifying the claim and proving the extent of the damage caused.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) involving the establishment, exercise or defense of legal claims in the proceedings before the courts or bodies of state administration.

Retention period. For this purpose, we generally process your personal data for no longer than 3 years from the date when you cease to use our Websites. In specific circumstances, we can process your data for a longer time, when it is required by applicable law.

9. HANDLING COMPLAINTS AND REQUEST, ANSWERING QUESTIONS

Purpose. We process your personal data in order to handle and close complaints and requests, as well as to answer questions.

Scope of data. We process your personal data, including first and last names, an e-mail address and the data connected with the use of Strefa Pracuj.pl, the Pracuj.pl Store or other Websites being the reason of a complaint, request or question. We also process your personal data contained within the complaint, request or question.

Legal basis. Our legitimate interests (Article 6 sec. 1 item f of the GDPR) consisting in improving the functionality of online services and building positive relations with Users and Clients based on reliability and loyalty.

Retention period. For this purpose, we process your personal data until the complaint or request is handled and closed or the question is answered, however not longer than 3 years from the data of your request.

IV. PROFILING YOUR PREFERENCES AND INTERESTS

For the purposes of our direct marketing activities, we profile your professional preferences and interests to most successfully adjust our marketing communication, including the offer of specific products and services of Grupa Pracuj, companies affiliated with Grupa Pracuj or partners of Grupa Pracuj. We evaluate your preferences and interests on the basis of the following data: (1) data collected in our systems supporting proper performance of our services, e.g. the CRM system or order management systems, as well as (2) data automatically collected using cookie files and related to your activity on the Websites or websites belonging to companies affiliated with Grupa Pracuj.

As a result of such profiling, you can receive personalized marketing communication related to the products and services of Grupa Pracuj, companies affiliated with Grupa Pracuj or partners of Grupa Pracuj, including commercial/promotional offers. Our marketing communication can be displayed on websites belonging to entities not affiliated with Grupa Pracuj, e.g. the Google or Facebook advertising networks. Our activities are related exclusively to professional relationship. We do not collect any information that would give us insight into your private life. To the contrary, we only collect information related to your professional activity and, what is more, to a very limited extent. We are interested exclusively in your activity on the Websites. The collected data is not connected with any information from other sources, including any information related to your activity on other websites than the Websites.

Legal basis. Our legitimate interests or legitimate interests of companies affiliated with Grupa Pracuj (Article 6 sec. 1 item f of the GDPR) involve marketing of products and Services of Grupa Pracuj, companies affiliated with Grupa Pracuj or partners of Grupa Pracuj, that you find attractive and that matches your needs and interests.

More information on using cookie files by Grupa Pracuj can be found in our [Cookie Policy](#).

V. WHOM DO WE SHARE YOUR PERSONAL DATA WITH?

Service providers

We share your data with our CRM service providers (e.g. Salesforce), analytical service providers (e.g. Google Analytics, HotJar), online marketing systems and marketing automation providers (e.g. Oracle Responsys, Google Adwords, Facebook), chat service providers (e.g. BespokeChat), hosting service providers (e.g. Oktawave), management and accounting support service providers (e.g. Navision, Microsoft Dynamics NAV). Our service providers are generally based in Poland and other countries of the European Economic Area (EEA), e.g. in Ireland. Some of our providers are based outside the EEA. Due to transmitting your data outside the EEA territory, we obliged our providers to guarantee a high level of personal data protection. Such guaranties result particularly from an obligation to use standard contractual clauses approved by the (EU) Commission or the participation in the “Privacy Shield” Framework established upon the Commission Implementing Decision (EU) 2016/1250 of 12 July 2016 on the adequacy of the protection provided by the EU-U.S. Privacy Shield.

You have the right to require us to provide the copies of the appropriate safeguards (e.g. standard contractual clauses) by making an enquiry as indicated in section II above.

State authorities

We share your personal data upon request of entitled state authorities, including particularly organizational units of the public prosecutor’s office, the Police, the President of the Personal Data Protection Office (UODO) or the President of the Office of Electronic Communications (UKE).

VI. WHAT ARE YOUR RIGHTS WITH REGARD TO PROCESSING YOUR PERSONAL DATA?

We ensure the execution of your rights indicated below. You can execute your rights contacting us at: zgody@pracuj.pl

Right to withdraw your consent/refusal to being sent marketing communication

You have the right to withdraw any consent granted earlier. Withdrawal of consent is effective only for the future and does not affect our data processing prior to the withdrawal.

With regard to consents to being sent marketing and commercial information, you can refuse to receive such information at any moment, which means, depending on the circumstances, refusal or withdrawal of consent: (1) to the processing of your personal data for the purposes of marketing, including profiling, by Grupa Pracuj and companies affiliated with Grupa Pracuj, (2) to being sent marketing and commercial information by telephone or e-mail.

Legal basis: Article 7 sec. 3 of the GDPR or Article 21 of the GDPR

Right to object to data processing

You have the right to object at any moment to processing of your personal data, including profiling, if we process your personal data on the basis of our legitimate interest (e.g. for the purposes of direct marketing of our products and Services).

If you object to processing of your personal data for marketing purposes, we discontinue such processing for these purposes. The same applies to objection to processing of your personal data for purposes other than marketing purposes, if the objection is well-founded.

Legal basis: Article 21 of the GDPR

Right to delete her or his data (“the right to be forgotten”)

You have the right to request the deletion of all or some of your personal data. You have the right to request the deletion of personal data, if:

- a) you have withdrawn a particular consent to the extent in which your personal data were processed on its basis;
- b) your personal data are no longer necessary for the purposes for which they were collected or processed;
- c) you have objected to using your personal data for marketing purposes;
- d) you have objected to processing your personal data on the basis of our legitimate interest (e.g. to using your data for the purposes of keeping statistics or using the Websites and satisfaction surveys) and your objection has been deemed well-founded;
- e) your personal data are processed illegally.

Despite the request for deleting the personal data due to making an objection or withdrawing consent, we may retain some personal data to the extent necessary for establishment, exercise

or defense against legal claims. It applies particularly to such personal data, as: first and last names, an e-mail address and the history of activity in the Pracuj.pl Store or Strefa Pracuj.pl, which we keep for the purposes of handling complaints and claims related to using our Services.

Legal basis: Article 17 of the GDPR

Right to restrict data processing

You have the right to request the restriction of processing your personal data. Such restriction of processing means that we temporarily refrain from processing your personal data specified in the request and we make such data inaccessible to other users.

It means that if you make such a request, you will be unable to use some of the functionalities of the Websites, which require processing of the said personal data, until the request is duly processed. You will also receive no messages, including marketing messages.

You have the right to request the restriction of using your personal data in the following cases:

- a) when you question the correctness of your personal data — in such event we will restrict their use for the time necessary for verifying the correctness of your data, however not longer than 7 days;
- b) when processing of your data is illegal and you request the restriction of their use instead of their deletion;
- c) when your personal data are no longer necessary for the purposes they were collected or used for, but you need them for the purposes of establishment, exercise or defense against legal claims;
- d) when you have objected to using your personal data for purposes other than marketing purposes — in such event such data processing is restricted for the time necessary for determining whether — due to your specific situation — the protection of your interests, rights and freedoms outweighs the our interests for which we process your personal data.

Legal basis: Article 18 of the GDPR

Right to access personal data

You have the right to request our confirmation whether we process your personal data, and if we do, you have the right to:

- a) obtain access to your personal data;
- b) acquire information on the purposes of processing, the categories of the processed personal data, the recipients or categories of recipients of such data, the planned period of retention of your data or the criteria according to which this period is determined, your rights under the GDPR and the right to complain to a supervisory body, the source of such data, automated decision-making, including profiling and safeguards applied in relation to transferring such data outside the territory of the European Union;
- c) acquire a copy of your personal data.

Legal basis: Article 15 of the GDPR

Right to correct your data

You have the right to correct or supplement the personal data you provided. To this end contact us at: zgody@pracuj.pl

Legal basis: Article 16 of the GDPR

Right to data portability

You have the right to acquire your personal data you provided and send them to another personal data controller of your choice, e.g. another operator of similar websites. You also have the right to request your personal data to be send directly by us to such another data controller, if it is technically possible.

Your personal data will be sent in the form of a CSV file. The CSV format is a commonly used and machine-readable format allowing the acquired data to be sent to another personal data controller.

Legal basis: Article 20 of the GDPR

How long does it take for us to fulfill your request?

- 1) If, while executing your rights, you make a request, we either fulfill it or refuse promptly, however not later than within one month from its receipt. If, however, due to the complex nature of the request or the number of the requests, we are not able to fulfill any request within a month, we will fulfill it within the next two months, informing you beforehand on the scheduled extension of the deadline.
- 2) For technical reasons we might need up to 48 hours to update your chosen settings in our systems. Therefore, it might happen that during the system update you will receive from us an e-mail message the receipt of which you resigned from.

Right to object

If you believe that your right to protect personal data or other rights granted to you under the GDPR have been violated, you have the right to make a complaint to the President of the Personal Data Protection Office (UODO). More information can be found at: <https://uodo.gov.pl/pl/83/155>

VII. HOW DO WE ENSURE THE SAFETY OF YOUR PERSONAL DATA?

We do our best to ensure safety of your personal data. The Websites use the Secured Socket Layer (SSL) protocols during the registration and logging in, which ensures the protection of the data which may identify you, as well as significantly impedes capturing access to our systems (including Strefa Pracuj.pl) by unauthorized systems or individuals.

VIII. HOW DO WE USE COOKIE FILES?

More information on using cookie files by Grupa Pracuj can be found in our [Cookie Policy](#)

IX. CHANGES IN THE PRIVACY POLICY

Accordingly to the needs, we can change and supplement the Privacy Policy. Any and all changes and additions to the Privacy Policy will be communicated to you by posting appropriate information on the main pages of our Websites, whereas in the event of significant changes we can also send an additional message to the e-mail address you provided.