

AIBY Sp. z o.o.

Personal Data Processing Policy during Candidate Selection Process

July 1, 2022 # 1

Warsaw, Poland

1. General Provisions

This Personal Data Processing Policy during Candidate Selection Process (hereinafter referred to as the 'Policy') defines personal data processing activities of AIBY Sp. z o.o. registered at 29 Hoża str., 00-521 Warsaw, Poland (hereinafter referred to as the 'Company', or 'Processor') during the organization and conduct of candidate selection for the Company's vacancies (i.e., during recruitment).

Personal data processing means any action or set of actions performed with personal data, including the collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, deletion of personal data.

This Policy is drawn up pursuant to the requirements of 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) (hereinafter referred to as the 'Regulation 2016/679') and the requirements of the Law of the Republic of Poland dated May 10, 2018 'Act of 10 May 2018 on the Protection of Personal Data (Journal of Laws of 2019, item 1781)'.

2. Personal Data Subjects

The Processor processes the data obtained from personal data subjects – natural persons, who have expressed their wish to participate in the candidate selection for the Company's vacancies posted on the Company's website or other platforms by filling in an online form (hereinafter referred to as 'candidates').

Data on natural persons may also be obtained from the web portals, social networks, media resources (hereinafter referred to as the 'web resources'), intended for posting of CVs or other similar information containing personal and professional characterization of a natural person, for the purpose of subsequent employment. Such natural persons are considered candidates in terms of their status as well (hereinafter referred to as the 'candidates recruited online'). It is assumed that the candidates recruited online have decided to post their data on

the web resources on their own, having agreed to the data processing policy of the processor administrating the web resource.

3. Scope of the Personal Data to be Processed. Purposes of Processing

The Processor processes the following personal data of the candidates:

- surname, given name, patronymic;
- date of birth;
- photo;
- e-mail address;
- registration and/or residence address;
- nationality;
- telephone number;
- education information – a place (places) of study, including postgraduate training programs, courses, seminars, webinars, trainings, and other forms of professional development;
- employment information – a place (places) of work, including internships, line managers and referees;
- information on family composition;
- links to personal social media and other web resources accounts.

Purposes of data processing:

- 1) organization and conduct of candidate selection for the employment in the Company's vacancies (recruitment);
- 2) increasing of the Company's personnel reserve.

By providing personal data about his/her line managers and referees the subject guarantees, that he/she has obtained his/her consent to the transfer of his/her personal data for processing in accordance with the Processor's purposes of processing.

The Processor processes the aforementioned personal data solely in accordance with the stated purposes.

4. Procedure and Conditions of Personal Data Processing

The basis for the personal data processing is the consent of the personal data subject. By marking this Policy as 'read' while filling in the online form, the candidate gives consent to the processing of his/her personal data in accordance with this Policy.

If necessary, the Processor may transfer personal data to third parties in compliance with the legislation of the Republic of Poland and Regulation 2016/679. Particularly, the Processor may provide personal data to third parties for the purposes of systematic data storage, organization of data search and data categorization, provision of controlled access to such data to the Company's employees. These third parties will be subject to confidentiality requirements and they will only use personal data as described in this Policy.

Provision of personal data to third parties for the purposes other than the stated above as well as distribution of data is prohibited.

The Processor stores personal data during the term necessary for the implementation of the stated purposes. For storage of data the Company uses its network-attached storage as well as the cloud resources of third parties. The Processor informs the candidate that the servers of third parties may be located in the countries, where in terms of the legislation of the Republic of Poland and Regulation 2016/679 the proper level of the protection of personal data is not ensured (North America, South America, Asia). Therefore, the candidate understands all the risks arising from the transfer of data to such countries and gives consent to that transfer.

The Company's employees have limited access to the personal data of the subject and implement data processing procedures only to the extent necessary to carry out their job (employment) duties.

5. Exercise of the rights of the data subject

Personal data subject has the right to:

- withdraw the consent at any time;
- get additional information on the processing of personal data (in certain circumstances, as provided by law, receive a copy of personal data in a structured, commonly used and machine – readable format), including information on the provision of such data to third parties;
- request that their personal data be corrected, erased or their processing ceases.

In order to exercise the aforementioned rights, the personal data subject shall submit a request to the Company in a form that his/her consent on the personal data processing has been obtained.

Obligations of the Processor are established and exercised in accordance with the legislation of the Republic of Poland and Regulation 2016/679.

6. Final Provisions

If the candidate has provided inaccurate information about himself/herself, the Processor may deny his/her participation in the competitive selection for the Company's vacancies. A person provided incomplete, outdated, false information about himself/herself or about any other personal data subject without the consent from the latter shall be liable in accordance with the legislation of the Republic of Poland.

Personal data processing ceases when the purposes of the data processing are reached, in the event of unlawful processing being detected, or if the personal data subject withdraws his/her consent, requests the processing to cease, and his/her data to be deleted.

Any questions related to the implementation of this Policy as well as enquiries from a personal data subject shall be submitted to the address of the Processor or the following email: legal@aiby.com.