

# Privacy policy

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## Overview

As maintaining the confidentiality of the information you provide us with is equally important to us, in this Privacy Policy we set out the purpose and manner of data processing and define our obligations with regard to the data entrusted to us.

When you, as an individual, contact us or use our services, whether acting on your own behalf or on behalf of another entity (e.g. our customer, supplier, etc.), or when we have received your personal data from other sources (e.g. publicly available industry websites or when your data has been disclosed to us as contact details for the execution of the agreements), we start processing your personal data. We process all your information responsibly and in accordance with the law.

The following information is intended to explain who we are, how we obtain information and what we do with it in our business, sales and marketing relationships and in relation to contacting us. If anything is not clear or raises your concerns, please contact us.

### I. Glossary - basic terms

1. **‘Controller’** means the natural or legal person, public authority, unit or other entity which alone or jointly with others determines the purposes and means of the processing of the

personal data; if the purposes and means of such processing are determined by Union law or Member State law, a Controller may also be designated by Union law or Member State law, or specific criteria for its designation may be set out.

2. **‘Joint Controller’** if two or more controllers jointly determine the purposes and means of the processing, they are joint controllers.
3. **‘Personal data’** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a first name and last name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.
4. **‘Processing’** means an operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
5. **‘Data recipient’** means a natural or legal person, public authority, unit or other entity to whom personal data is disclosed, whether or not it is a third party
6. **‘Consent of the data subject’** means a freely given, specific, informed and unambiguous demonstration of intent by which the data subject, in the form of a statement or a clear affirmative action, consents to the processing of personal data concerning him or her.
7. **‘Cookies’** - means IT data, in particular small text files, recorded and stored on the devices through which the User accesses the Website.
8. **‘Website’** - means the website under which the Controller operates the website, operating in the domain [www.PersonnelService.com](http://www.PersonnelService.com).
9. **‘Device’** - means an electronic device through which the User accesses the Website.
10. **‘User’** means an entity to whom, in accordance with the Regulations and legal provisions, electronic services may be provided or with whom an Agreement for the provision of electronic services may be concluded.
11. **‘GDPR’** - 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).

## II. Controller (Joint Controllers)

The controllers of your personal data are:

- **Personnel Service sp. z o.o.**, ul. Bolesława Chrobrego 5, 11-400 Kętrzyn, NIP [Tax ID] 8943069469, REGON [Business ID] 363064852 as the owner and manager of <https://personnelservice.pl/>, and the entities listed in **Section VII**. Privacy Policy as Joint Controllers.

### III. Data Protection Officer

The Joint Controllers have appointed a **Data Protection Officer**, Mariusz Zajkiewicz, who can be contacted via email by sending correspondence to the email address: [iod@personnel-service.pl](mailto:iod@personnel-service.pl) or general e-mail address: [biuro@personnel-service.pl](mailto:biuro@personnel-service.pl) and by snail mail to the correspondence address ul. Bolesława Chrobrego 5, 11-400 Kętrzyn with the note 'GDPR'.

As part of exercising the rights referred to in **Section VIII. User Rights**, the User may make a request to the Joint Controllers to perform certain actions. The request should be addressed to the email addresses or postal address given above.

### IV. What personal data do we collect and what is the purpose and legal basis of our activities?

The extent of the data we process depends on the purpose and the information you provide to us, as well as the form of contact you have chosen and what information is required in connection with our relationship.

Your personal data shall be processed for:

- a) marketing of products and services - the basis for the processing is **Article 6(1)(a) 'consent' of the GDPR and Article 172 section 1 of the Telecommunications Law,**
- b) remembering your preferences and settings such as login, password, IP address, date and time of login - in which case the basis for processing shall be **Article 6(1)(a) 'consent' of the GDPR in conjunction with Article 173, Telecommunications Law,**
- c) sending recruitment-related offers, newsletters in accordance with **Article 6(1)(a) of the GDPR**
- d) concluding or executing the Agreement - in accordance with **Article 6(1)(b) of the GDPR,**
- e) the handling of complaints, defective product claims and requests and, as part of this, to provide a response on the basis of **Article 6(1)(c) of the GDPR,**
- f) sending offers related to the partnership, execution of the agreements, possible establishment, investigation, enforcement of claims or defence against claims, which are the realisation of the Controller's legitimate interest (such as debt collection, conducting court and enforcement proceedings) pursuant to **Article 6(1)(f) of the GDPR,**
- g) prevention of abuse and fraud - in order to ensure the security of the Services provided in accordance with **Article 6(1)(f) of the GDPR,**

The legal basis for the above depends on the context of the communication. If these are general enquiries or conversations, the basis shall be our "legitimate interest" as Controller (in line with the purposes indicated above; **Article 6(1)(f) of the GDPR**). On the other hand, if the enquiry is for the purpose of entering into an agreement or is related to an already concluded agreement other than for the provision of our services (as referred to in **section IV(d)** above), the legal basis shall be 'taking action at the request of the data subject prior to entering into the agreement' or the need to perform the agreement (**Article 6(1)(b) of the GDPR**).

By visiting our website, users may consent to our use of cookie technology, which enables our website to function properly, as well as to analyse information about how the website is used.

We process this data for the purpose of improving the quality of our website, to tailor content to visitors' interests and to continually improve its performance. Some cookies also enable marketing of our products and services on our website.

The legal basis for the use of cookies and similar technologies is your consent, except where their use is necessary for the operation of our website, where we base such use on a legal provision (**Article 173(3)(2) of the Telecommunications Act**) and our legitimate interests (**Article 6(1)(b) of the GDPR**), respectively.

If you have not provided us with your data on your own behalf, i.e. you are acting on behalf of another entity, we process your data for the purpose of establishing contact in the context of which you are acting on behalf of a third party, and for the conclusion or execution of the agreement with that third party or the execution of the joint venture. The basis for processing your personal data for this purpose shall be our legitimate interest (**Article 6(1)(f) of the GDPR**) - building and maintaining a relationship with the third party on whose behalf you are acting, including entering into and performing relevant agreements with that third party, as well as the intention to build a positive image of Personnel Service.

Notwithstanding the above, your personal data, i.e. primarily your first name and last name, e-mail address and telephone number, may be used by us to send you occasional correspondence (e.g. Christmas wishes) or to contact you about special offers of Personnel Service products or services. The basis for processing your Personal Data for this purpose shall be our legitimate interest (**Article 6(1)(f) of the GDPR**) - the desire to maintain our relationship, to build a positive image of Personnel Service and to market Personnel Service products or services.

In addition, if we process your Personal Data for the purpose of defending against potential claims, the basis for processing your Personal Data for this purpose shall be our legitimate interest (**Article 6(1)(f) of the GDPR**);

In any case, we send commercial information to electronic addresses (e-mail/telephone) only with your prior consent (legal basis).

Your provision of personal data is voluntary, but necessary in order to respond to your enquiry or for the purpose of correspondence.

If your data are processed on the basis of your consent, we remind you that you can withdraw your previously given consent at any time, without affecting the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal. If, on the other hand, your data is processed on the basis of the Controller's legitimate interests, you have the right to object to such processing.

The personal data you provide shall not be subject to automated decision-making or profiling.

The personal data you provide shall only be processed in the European Economic Area or in a third country ensuring an adequate level of protection, in accordance with a decision of the European Commission currently in force.

## V. How long do we process your data?

As a rule, data processed on the basis of our legitimate interest shall be processed until you object or until the purpose for which it was processed has been achieved.

If you are participating in a recruitment process then we shall process your data until the end of the recruitment process but for no longer than **12 months**.

If you have agreed to participate in subsequent recruitment processes your data shall be processed for a further **12 months** after the end of the recruitment process (**24 months** in total).

If you are not our contractor or business partner, we shall only keep data collected in connection with ongoing contact, for a period of a few weeks (some cookies), up to a maximum of **5 years** (more detailed enquiries and conversations that may be relevant to our future contact), depending on the category of the particular information.

If you are our contractor or business partner, we store data collected solely in connection with the execution of the agreement for a period of **5 years** from the end of the settlement year in which the partnership ended.

Data processed solely on the basis of your consent is processed until you revoke your consent, if any, or until the purpose for which your consent was given has been achieved.

## VI. Who actually has access to your personal data?

Only the following persons have access to your personal data

- duly authorised employees or associates of the Joint Controllers, who are obliged to maintain confidentiality and not to use it for purposes other than those for which the Joint Controllers obtained the data;
- entities that support us in the provision of our services, based on relevant agreements to entrust personal data to be processed, such as e-mail marketing platforms, suppliers of contact tools (instant messaging), suppliers of legal and consultancy services, hosting providers, couriers;

All these entities have access only to the information they need to carry out the specific activities and purpose defined by the Joint Controllers.

## VII. Joint Controllers

- a) **Personnel Service sp. z o.o.** with its registered office in Kętrzyn, address: Bolesława Chrobrego 5, 11-400 Kętrzyn, KRS (National Court Register) 0000587930, NIP (Tax ID) 8943069469, REGON (Business ID) 363064852,

- b) **Personnel Service S.A.** with its registered office in Wrocław, address: ul. Sucha 3, 50-086 Wrocław, KRS (National Court Register) 0000788971, NIP (Tax ID) 8992863575, REGON (Business ID) 383525444,
- c) **Human Support sp. z o. o.** with its registered office in Oleśnica, address: Lwowska 31 lok. 101, 56-400 Oleśnica, KRS (National Court Register) 0000520552, NIP (Tax ID) 8971801215, REGON (Business ID) 022476412,
- d) **Ukrainian Services sp. z o. o.** with its registered office in Kętrzyn, address: ul. Bolesława Chrobrego 5, 11-400 Kętrzyn, KRS (National Court Register) 0000343785, NIP (Tax ID) 8971757684, REGON (Business ID) 021130189,
- e) **Workpol Polska sp. z o.o.** with its registered office in Wrocław, address: ul. Gwiaździsta 66 lok. 2B.06, 53-413 Wrocław, KRS (National Court Register) 0000770808, NIP (Tax ID) 8992857899, REGON (Business ID) 382542966,
- f) **Personnel Service Polska sp. z o.o.** with its registered office in Wrocław, address: ul. Gwiaździsta 66 lok. 2B.06, 53-413 Wrocław, KRS (National Court Register) 0000993026, NIP (Tax ID) 8992937517, REGON (Business ID) 523178380,
- g) **Viza Staff Poland sp. z o.o.** with its registered office in Wrocław, address: Gwiaździsta 66 lok. 2B.06, 53-413 Wrocław KRS (National Court Register) 0000942638, NIP (Tax ID) 8992915042, REGON (Business ID) 520952614,
- h) **Viza Staff TOB (limited liability company under Ukrainian law)** with its registered office in Ukraine, 51939, Dnipropetrovsk Oblast, city of Kamianske, Ulitsa Metallurgov (street), building 4, identification number 44077125,
- i) **Personnel Service 4you s.r.o. (Czech company)** with its registered office at Prokešovo náměstí 2020/6, Moravská Ostrava, 702 00 Ostrava, identification number 11998121,
- j) **Personnel Service Austria GmbH (Austrian company)** with its registered office at Reisetbauerstraße 22, AT-4020 Linz, UID ATU72040579, Firmenbuchnummer 467509p,
- k) **Innbenefits sp. z o. o.** with its registered office in Warsaw, address: ul. Puławska 2, 02-566 KRS (National Court Register) 0000889930, NIP (Tax ID) 5272953389, REGON (Business ID) 388486720,

## VIII. What are cookies and other similar technologies? How and for what purpose do we use them?

Cookies are small text information sent by a server and stored on your side (in the memory of your computer, phone, tablet or other device you use to connect to our services).

It stores information that we may need to adapt to your use of our website and gather statistical data.

When you visit our website, we have the ability to collect data about your service provider's domain name, browser type, operating system type, IP address, websites visited, items downloaded, and operational data or information about the location of the device you use.

We assure you that all information received in this way is used by us exclusively for the purposes set out in this policy and is in no way harmful to you or the device you are using, as it does not make any changes to the configuration.

Cookies used on the website:

- a) **Technical** - includes cookies: necessary for the proper functioning of the website for the purpose of enabling its functionality, but their operation has nothing to do with tracking the user.
- b) **Analytical** - used to analyse user behaviour on the website, for statistical and analytical purposes (to improve the website's operation), but they do not contain information to identify the data of a specific user
- c) **Marketing** - used to analyse user behaviour and provide information that identifies the data of a specific user, including for the purpose of marketing on third party websites.

Of course, the user can change the use of cookies, including blocking them completely or deleting them via the browser or service configuration. However, you must bear in mind that such operations may prevent or significantly impede the proper functioning of our website, for example by significantly slowing it down, so we recommend that you do not disable them in your browser.

## IX. How Cookie settings are changed in the most popular browsers.

Mozilla Firefox

Instructions on the website: [https://support.mozilla.org/en-US/kb/storage?as=u&utm\\_source=inproduct&redirectslug=permission-store-data&redirectlocale=en-US](https://support.mozilla.org/en-US/kb/storage?as=u&utm_source=inproduct&redirectslug=permission-store-data&redirectlocale=en-US)

Opera

Instructions on the website: <https://help.opera.com/pl/latest/security-and-privacy/>

Safari

Instructions on the website: <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>

Google Chrom

Instructions on the website: <https://support.google.com/chrome/answer/95647?hl=pl&co=GENIE.Platform%3DDesktop>

## **X. User rights.**

The User who has provided the Joint Controllers with their personal data has the right to:

- a) access their data and receive a copy of their data;
- b) rectify (amend) their data;
- c) delete the data (the so-called right to be forgotten);
- d) restrict the processing of their personal data;
- e) object to the processing of your data, as well as to the processing for direct marketing purposes;
- f) withdraw consent where the Controller shall process the User's data on the basis of consent, at any time and in any manner, without affecting the lawfulness of the processing performed on the basis of consent before its withdrawal;
- g) lodge a complaint with the President of the Personal Data Protection Office when the User considers that the processing of personal data violates the GDPR.

The complaint may be lodged with:

**President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw.**

## **X. Additional information.**

[How does Google use the information from the sites or apps that use our services?](#)

## **XI. Final provisions.**

To the extent not covered by this privacy policy, the relevant provisions of Polish law shall apply.

The joint controllers reserve the right to make changes to the privacy policy as a result of changes in legislation.

The joint controllers reserve the right to make changes to the website's privacy policy which may result from the progress of the Internet technology, possible changes in the law on personal data protection and the development of the website. We shall inform users of any changes in a visible and understandable way.

This Privacy Policy is effective as of .....