

**PRIVACY POLICY**  
**of Global Work Spółka z ograniczoną odpowiedzialnością**

Legal basis

- Personal Data Protection Act of 10 May 2018 (uniform text: Journal of Laws No. 2018.1000), hereinafter referred to as the **Act**.
- REGULATION OF THE EUROPEAN PARLIAMENT AND THE COUNCIL (EU) 2016/679 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 **GDPR**.

This Policy sets out principles, scope and methods of collecting, processing and using information about Users visiting the website [www.globalwork.com.pl](http://www.globalwork.com.pl) and Users applying for job via the link available at [www.globalwork.com.pl](http://www.globalwork.com.pl), hereinafter referred to as the Website.

The purpose of this Policy is to ensure the uniform and high level of protection of personal data of Website users. The Security Policy provides for the goals and scope of personal data processed, data protection methods, the legal basis of the processing, and rights of data subjects.

**I. GENERAL REGULATIONS:**

Legal basis: information obligation under Art. 13(1)(a) of the GDPR and Art. 14 of the GDPR

1. Data of users of the Website are processed by Global Work sp. z o.o., with its registered office in Zabrze, 41-800 Zabrze, ul. Padlewskiego 6, entered in the register of companies kept by the District Court in Gliwice, 10th Commercial Division, under the number 0000281957; VAT No. (NIP): 648-263-13-91, share capital: PLN 200,000.
2. Global Work Sp. z o.o. acts as a data controller of personal data of Website users within the meaning of the GDPR.
3. All questions concerning data processing and the User's rights should be addressed to the Data Controller to the address given in Section 1 or by e-mail to the following address: [info@globalwork.com.pl](mailto:info@globalwork.com.pl)

**II. SECURITY OF PERSONAL DATA PROCESSING:**

1. Personal data of Website users are kept in the separate data base in the eRecruiter application, which is stored in the server of the application software supplier in the special security zone, which guarantees relevant protection.
2. Global Work Sp. z o.o. inspects the process of collecting, storing and processing personal data and other information on an ongoing basis by use of, among others, physical safety measures, in order to protect

Member of the  
KAEFER Group



the data against unauthorised access to the system. The data sent by the User are protected with a Secure Socket Layer (SSL) protocol.

3. The database is accessible solely to authorised database administrators. Those persons are trained and obliged to keep the data strictly confidential.
4. When you visit the Website of Global Work, the following information is temporarily stored for a short period:
  - IP address
  - Visit date and time
  - Name and URL
  - a website from which you entered the Website
  - your Internet browser.

Those data are only processed to enable access to the website, assess system stability and security and for administration purposes.

### **III. SCOPE OF PERSONAL DATA COLLECTED BY THE COMPANY**

To minimise the processing, only those categories of personal data that are necessary to achieve goals connected with recruitment administration are processed. The personal data processed by the data controller come from data subjects. The personal data are not transferred to third states within the meaning of the GDPR, i.e. non-EEA member states. The personal data are not profiled by the data controller.

The personal data are not shared with third parties without the data subject's prior explicit consent. The personal data can be shared **without the data subject's consent** solely with public entities, e.g. public authorities and administration (e.g. tax authorities, law enforcement authorities and other entities authorised by commonly applicable legal regulations).

The personal data processing may be subcontracted to entities processing the data for Global Work as the data controller, however solely for the purpose of recruitment and to accelerate recruitment processes based on the data processing agreement. The processor authorised by Global Work processes the personal data provided thereto, however solely for the purpose and to the extent set out in the processing agreement. Without entering into the processing agreement with the processor, we would not be able to carry out our activities related to the Website. As the data controller, we share your personal data for processing purposes with the following categories of entities:

- authorised business partners and end customers of Global Work, including companies of the KAEFER capital group (Global Work is a member of that group) in connection with recruitment and employment, based on the legitimate interest of Global Work consisting in the improvement and acceleration of recruitment;
- authorised suppliers of software and IT services;
- other entities if such an obligation is set out by absolutely applicable regulations.

The data controller does not transfer the personal data to third countries.

**Global Work Sp. z o.o. collects the following categories of personal data for the purpose of its recruitment processes:**

1. Data obtained from Website users during recruitment in the application form;
2. Data whose processing is permitted by law (e.g. Art. 22<sup>1</sup> of the Labour Code);
3. Data collected automatically by the Website via cookies and resulting from your activities on the Website in connection with actions taken to file your application via the Website.

Legal basis: if the processing is necessary to perform the service agreement for the User (Art. 6(1)(b) of the GDPR); if the processing is necessary to fulfil the data controller's legal obligation (Art. 6(1)(c) of the GDPR); the processing based on the data subject's consent (Art. 6(1)(a) of the GDPR); Global Work's legitimate interest.

#### **IV. MANNER OF USE OF THE PERSONAL DATA**

1. The personal data must be given to enable the User to submit their job application via the application form, file the candidate's applications to job offers published on the Website and submit ad-hoc applications from Global Work's website.
2. The User's personal data can be used for the purpose of correspondence with the User, e.g. to respond to the User's inquiries and complaints, and the statistical analysis of customers' activities on the website. The data may be disclosed at a request of competent authorities in all cases required by law, including in particular inspections conducted by supervisory authorities (Personal Data Protection Office).

#### **V. PERSONAL DATA RETENTION PERIOD**

Criteria: legal regulations, consent expiry date, period necessary to achieve the goal.

- a) Till the withdrawal of the consent if the data are processed on the basis of the consent.
- b) Ongoing recruitment: for up to 1 year from the end of recruitment.
- c) Future recruitment: for up to 1 year from the consent date.
- d) If the data cannot be updated.
- e) For the period necessary to fulfil the data controller's legal obligations.

#### **VI. RIGHTS OF THE USER**

**The personal data are disclosed voluntarily. However without personal data necessary to administer the recruitment, the User's job application will not be taken into consideration.**

Pursuant to the GDPR, the User that has given their personal data has the following rights:

- a) **Right of access to personal data**, as referred to in Art. 15 of the GDPR: when providing their personal data, the User has the right to browse and access those data. This does not mean, however, that the User has the right of access to all documents with those data because such documents can contain confidential information.
- b) **Right of personal data correction, completion, update and rectification of personal data**, as referred to in Art. 16 of the GDPR: if the personal data are changed. For that purpose, the User is requested to notify the data controller to ensure that the data we have are true and valid. The User has also the right to correct or rectify their data if their personal data have not changed, but are untrue or incorrect for any reason.

- c) **Right to erasure (“right to be forgotten”)** under Art. 17 of the GDPR. The User has the right to request that their personal data are erased if:
- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
  - the data subject objects to the processing pursuant to Art. 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Art. 21(2) of the GDPR;
  - the personal data have been unlawfully processed;
  - the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
  - the personal data have been collected in relation to the offer of information society services, as referred to in Art. 8(1) of the GDPR.
- d) **Right to restriction of processing** based on Art. 18 of the GDPR: the User has the right to obtain from the controller restriction of processing if:
- the User contests the accuracy of their personal data;
  - the User believes that the processing is unlawful, but opposes the erasure of their personal data by Global Work;
  - the User has objected as referred to in Item (f) below;
  - the personal data are required for the establishment, exercise or defence of claims, e.g. before courts.
- e) **Right to data portability** based on Art. 20 of the GDPR: the User has the right to receive their personal data in a machine-readable format and has the right to transmit those data to another controller if the processing is based on the User’s consent.
- f) **Right to object to processing** based on Art. 21 of the GDPR: each User has the right to object to processing of personal data concerning them by Global Work which are processed for legitimate purposes in accordance with legal regulations.
- g) **Right to lodge a complaint with the supervisory authority** (i.e. the President of the Personal Data Protection Office) based on Art. 77 of the GDPR: if the User considers that the processing of personal data relating to them infringes legal regulations or that the data controller violates rights stemming from commonly applicable regulations on personal data protection.
- h) **Right to obtain information and file inquiries and complaints:** each User has the right to request the following information at any time: recorded personal data concerning them, the source of data, the purpose of processing, data recipients and other entities to which the data are transferred. The

User has also the right to lodge a complaint and request explanation if they consider that their data are processed in an unlawful way or contrary to the purpose of processing. The response will be prepared in a clear and understandable form within no more than 14 days and will be delivered to the User in writing or by e-mail.

## **VII. USE OF COOKIES**

1. Cookies are small text files recorded by the Internet browser in the User's computer disc during the User's browsing the Website.
2. Global Work Sp. z o.o uses cookies to:
  - a. adjust the content of [www.globalwork.com.pl](http://www.globalwork.com.pl) to the User's preferences and optimise the use of its websites;
  - b. support and enforce security actions;
  - c. analyse the manner of use of Global Work's websites.
3. Pursuant to Art. 173.3 of the Telecommunications Law, the moment the User enters the website [www.globalwork.com.pl](http://www.globalwork.com.pl), the information on the use of cookies must be displayed.

1. Global Work Sp. z o.o. uses the following types of cookies:
  - a. necessary cookies, i.e. files enabling the use of the Website;
  - b. security cookies;
  - c. cookies enabling to collect information about the use of the Websites;
  - d. cookies enabling the Website to "remember" settings chosen by the User and the personalisation of the User's interface.
2. The Internet browsers usually allow for cookies storing in the User's device on a default basis. However, Users may change the settings of cookies at any time. The settings may be changed in particular to block automated cookies in the internet browser setup or inform about any cookie recorded in the user's device. Detailed information about the possibility and methods of cookies operation is available in the settings of your browser. If the settings of cookies are not changed, the information can be stored in the User's device and Global Work sp. z o.o. can store and access the information in the User's device.

## **VIII. PERSONAL DATA PROTECTION**

The data controller complies with personal data protection regulations. The data controller implements measures aimed at protecting the User's personal data. The systems and procedures protecting against unauthorised access to and disclosure of personal data provide necessary security. The data controller's procedures and systems are regularly monitored in terms of possible risks. The personal data are stored in the systems which are subject to strict access restrictions.

The data controller has personal data protection procedures in place. If any incident connected with the processing of your personal data by Global Work poses a high risk of violation of your rights and freedoms, the data controller will notify you.

## **IX. AMENDMENTS TO THE PRIVACY POLICY**

All matters not provide for herein are governed by commonly applicable legal regulations. In the case of any discrepancies between this Privacy Policy and commonly applicable legal regulations, the latter prevail.

Global Work Sp. z o.o. reserves the right to amend this Privacy Policy by publishing a new policy on its website [www.globalwork.com.pl](http://www.globalwork.com.pl). The User's rights stemming from this Privacy Policy will not be limited without the User's consent.

Global Work Sp. z o.o. will archive all previous versions of this Privacy Policy to make them available to the User if necessary.

## **CONTACT**

In all matters related to this Privacy Policy and to file requests for the exercise of your rights, please contact:

**Global Work Sp. z o.o. with its registered office in Zabrze (postal code: 41-800), ul. Padlewskiego 6,  
e-mail: [info@globalwork.com.pl](mailto:info@globalwork.com.pl)**

This Privacy Policy comes into force as of 28 May 2019.