



## PRIVACY POLICY

*in force at Global Work Sp. z o. o. from January 28, 2021.*

*rev.01\_ 30.08.2022*

### Legal basis

- *Personal Data Protection Act of May 10, 2018. (uniform text: Journal of Laws of 2018, item 1000) - hereinafter referred to as the **Act***
- *REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (general regulation on the protection of personal data GDPR) - hereinafter referred to as **GDPR**.*

This Policy defines the rules, scope and method of collecting, processing and using information about Users applying for job offers 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 a uniform and high level of protection of personal data of users using the Website. The Security Policy specifies: the purposes and scope of the processed personal data, the method of their protection, legal grounds for processing and the rights of data subjects.

### **I. GENERAL PROVISIONS:**

1. The data of the Website users are processed by Global Work sp. Z oo, based in Zabrze, 41-800 Zabrze, ul. Padlewskiego 6, entered into the Register of Entrepreneurs kept by the District Court in Gliwice, 10th Commercial Division, KRS 0000281957: NIP: 648-263-13-91, with a share capital of PLN 200,000.
2. With regard to the personal data of the users of the Global Work Sp. z o. o. acts as the Personal Data Administrator within the meaning of the GDPR.
3. In the event of questions regarding the processing of data and the rights of Users, contact with the Administrator is possible in the following way: at the address indicated in paragraph 1 above, or via e-mail to the following address: [info@globalwork.com.pl](mailto:info@globalwork.com.pl)

Legal basis: information obligation, art. 13 sec. 1 lit. a GDPR.

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

The collection of personal data of the Website users is a separate database in the eRecruiter application, stored on the application software provider's server, in a special security zone ensuring an appropriate level of protection.

1. Global Work Sp. z o. o. conducts ongoing control of the collection, storage and processing of personal data and other information, including physical security measures to protect against unauthorized access to the system. The data sent by the User is protected by the use of the secure Secure Socket Layer (SSL) protocol.
2. Only authorized persons assigned to activities related to database administration have access to the database. These people are trained and are obliged to maintain strict confidentiality.
3. Personal data is collected only for the purposes of:
  - Website management and system administration. Legal basis: legitimate interest in website management, marketing and communication strategy; and / or if it is not possible because mandatory legal provisions require it, only in these limited cases it can be based on consent.
  - Cooperation with law enforcement authorities / courts, management of legal disputes and claims. Legal basis: processing is necessary for the purposes of the legitimate interests pursued by Global Work,

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which include the protection of the company's assets, protection of its legal interests and the management of claims and legal disputes.

### **III. SCOPE OF COLLECTED PERSONAL DATA**

In accordance with the principle of minimization, only the categories of personal data that are necessary to achieve the objectives related to the administration of recruitment processes are processed. The source of the Personal Data processed by the Administrator are the data subjects. We can process the following personal data:

- Identification data is information such as name and surname, contact details (including home address, home telephone number and mobile phone number), nationality and country of residence, date of birth, and languages spoken
- CVs / resumes and other recruitment information - we may process your CV / curriculum vitae, work history, information about your skills, experience and education and other relevant information included in the cover letter or collected as part of the application process;
- Compensation and Benefit Information - We may process personal information about your current salary and benefits, including (without limitation) current allowances, periodic payments and benefits;
- Information that you choose to share with us - we may process additional personal data if you choose to share it with us.

Personal data is not transferred to a third country within the meaning of the provisions of the GDPR, i.e. to countries that are not members of the EEA. Personal data is not subject to profiling by the Personal Data Administrator.

Personal data is not shared with third parties without the express consent of the data subject. Personal data without the consent of the data subject may be made available only to public law entities, i.e. authorities and administration (e.g. tax authorities, law enforcement authorities and other entities authorized in generally applicable law).

Personal data may be entrusted for processing to entities processing such data for Global Work as the Personal Data Administrator, but only for the purpose related to recruitment processes and to accelerate recruitment processes, on the basis of entrusting the processing of personal data by way of a contract. The entity entrusted with the processing of personal data by Global Work processes the entrusted personal data, but only for the purposes, to the extent and for the purposes indicated in the entrustment agreement. Without entrusting your personal data for processing, we would not be able to conduct our business on the Website. As the Personal Data Administrator, we entrust personal data for processing to the following categories of entities:

- authorized contractors, suppliers and contractors
- end customers of Global Work, including entities from the capital group to which Global Work belongs (KAEFER group) in connection with the recruitment and employment process, based on the legally justified interest of Global Work, which is the improvement and acceleration of the recruitment process,
- authorized suppliers of software and IT services,
- other entities if the obligation results from mandatory provisions, including state authorities, law enforcement agencies.

The Personal Data Administrator does not transfer personal data to Third Countries.

**Global Work Sp. z o. o. collects the following categories of personal data in order to carry out the recruitment process:**

1. Data obtained from the User of the Website, provided by the User in the recruitment process when submitting the Application.
2. Data whose processing is permitted by applicable law (e.g. Article 22<sup>1</sup> of the Labor Code)
3. Data collected automatically by the Website via cookies and resulting from your activity on the Website pages in connection with activities aimed at submitting an application via the Website.

Legal basis: necessity to perform the contract for the provision of Services to the User (Article 6 (1) (b) of the GDPR), the necessity of processing to fulfill the legal obligation incumbent on the Administrator (Article 6 (1) (c) of the GDPR), consent of the person the data subject (Article 6 (1) (a) of the GDPR).

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#### **IV. HOW TO USE THE COLLECTED DATA**

1. The User's personal data is used to make it possible to submit an application using the Application Form and to submit a candidate's Application for job offers posted on the Website and for the purpose of the so-called spontaneous applications, i.e. from the level of the Global Work website.
2. Users' personal data may be used for correspondence with the User, e.g. answering inquiries and complaints, as well as for statistical analysis of customer behavior on the website. They may be made available at the request of authorized authorities in all cases required by law, in particular control carried out by supervisory authorities (Personal Data Protection Office).

#### **V. PERIOD FOR WHICH PERSONAL DATA WILL BE STORED**

- a) until the consent is withdrawn, if the data is processed on the basis of the consent granted,
- b) ongoing recruitment - up to 1 year from the end of the recruitment process,
- c) in relation to future recruitment - up to 2 years from the date of consent,
- d) when it will not be possible to update the data
- e) for the period required for the Administrator to comply with legal obligations

The criteria used to determine the appropriate storage period include:

- the need to achieve a given goal
- the need to provide our services for you
- the period for which you have given your consent
- law.

#### **VI. USER RIGHTS**

**Providing personal data is always voluntary. However, failure to provide personal data necessary to administer the recruitment process will result in the inability to include the User's application in the recruitment process.**

In accordance with the provisions of the GDPR, the User who provided his personal data has the following rights:

- a) **The right to access your personal data** referred to in art. 15 GDPR - by providing personal data, the User has the right to view and access them; however, this does not mean that he has the right to access all documents containing the data, as they may contain confidential information;
- b) **The right to correct, supplement, update and rectify personal data** referred to in art. 16 GDPR - if the personal data has changed. For this purpose, the User is asked to inform us as the Personal Data Administrator about this fact, so that the data we have is consistent with the actual state and up-to-date; also in a situation where there has been no change of personal data, but for any reason the data is incorrect or has been recorded incorrectly, the User has the right to request their correction or rectification;
- c) **The right to request the deletion of data (the right to be forgotten)** , legal basis: art. 17 GDPR. The User may request the deletion of his personal data when:
  - personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
  - the data subject has withdrawn the consent on which the processing is based and there is no other legal basis for the processing;
  - the data subject objects to the processing pursuant to Art. 21 sec. 1 GDPR against processing and there are no overriding legitimate grounds for processing or the data subject objects to the processing pursuant to Art. 21 sec. 2 GDPR against processing;
  - the personal data has been processed unlawfully;
  - personal data must be removed in order to comply with the legal obligation provided for in the Union law or the law of the Member State to which the controller is subject;
  - the personal data has been collected in relation to the offering of information society services referred to in art. 8 sec. 1 GDPR.

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- d) **The right to limit processing** , the legal basis of art. 18 GDPR - the User may submit a request to limit the processing of personal data if:
- He questions the correctness of his personal data,
  - Believes that the data is processed without a legal basis, but does not want Global Work to delete this personal data;
  - He will file an objection referred to in point (a) f below,
  - Personal data is needed to establish, investigate or defend claims, e.g. in court,
- e) **The right to transfer data** , the legal basis of art. 20 GDPR - the User has the right to obtain his data in a format that allows the data to be read on a computer and the right to send this data in such a format to another administrator; the User is entitled to this right only if the basis for the processing of personal data was consent,
- f) **The right to object to the processing of personal data** , the legal basis of art. 21 GDPR - each User has the right to object if he or she does not consent to the processing of personal data by Global Work that has so far been processed for legitimate purposes in accordance with the law,
- g) **The right to lodge a complaint to the supervisory body** (i.e. to the President of the Personal Data Protection Office) referred to in art. 77 GDPR - if the User considers that the personal data is being processed unlawfully or in any way the administrator violates the rights resulting from the generally applicable provisions of law in the field of personal data protection.
- h) **The right to obtain information and submit inquiries and complaints**, whenever the User has the right to request information at any time regarding: registered personal data concerning him, the source of data acquisition, the purpose of data processing, data recipients and other data subjects are transferred. The user also has the right to lodge a complaint and request explanations if he claims that his rights have been violated by the processing of personal data unlawfully or for the purpose of processing. The answer will be prepared in a simple and understandable form, within no more than 14 days, and provided to the user in writing or by e-mail.

## VII. USE OF "COOKIES"

KA EFER uses the so-called cookies. These are small files that your browser automatically creates and that are stored on your device when you visit our website. Cookies do not damage your device, it is not malware. The information is stored in a cookie that is created each time you connect to the website. However, this does not mean that KAEFER will recognize your identity from the information stored in the cookie. The use of cookies makes the website more user-friendly. KAEFER uses the so-called timing cookies to recognize what visitors are watching most often. These cookies are automatically deleted when you leave the website.

Cookies are also used for statistical purposes, they inform how often a given page is visited, this information is used to improve our website. These files make it possible to recognize website visitors. They are removed after a short time.

The data processed by the cookie is required for the above purposes to protect KAEFER's legal interests from third parties, in line with Art. 6 sec. 1 lit. f) GDPR.

Most browsers automatically accept cookies, but you can also set your browser so that no cookies are stored on your computer, and then a message is always displayed in front of the new cookie. Disabling cookies completely may result in the KA EFER website not functioning completely properly.

### Analytical tools

KA EFER uses Google Analytics to adjust the demand and to progressively optimize its website, which is in line with Art. 6 sec. 1 lit. f) GDPR. Google Analytics is an analytical service belonging to Google Inc. In this context, on the one hand, anonymous user profiles are created and, on the other hand, cookies are used.

The information generated by the cookie about your use of the KAEFER website is transferred to a Google server in the USA and stored there . The following data is transmitted:

- browser type, version,

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- operating system used,
- url address,
- IP address,
- time of entry.

KAEFER website, to compile reports on the activities and activities on the website, and to ensure the continued operation of the website and its use for purposes such as marketing and website design. This information may be sent to third parties if required by law or if third parties process this data as part of their business. Under no circumstances will your IP address be shared. The IP address remains anonymous, so identification is not possible.

may refuse the use of cookies by disabling the appropriate settings in your browser, however please note that then you may not be able to use all functions of the KAEFER website. You can also prevent the collection of data generated by cookies depending on your use of the website (including your IP address) and the processing of this data by Google by downloading and installing an add-on browser on your device.

As an alternative to the add-on browser, especially for browsers on mobile devices, you can also prevent the collection of data by Google Analytics. Opt-out cookies are set to prevent future collection of your data when you visit the KAEFER website. Opt-out cookies are only valid in this browser and only for the KAEFER website and are stored on your device. When you delete cookies from your browser, you must reinstall the opt-out cookie.

KA EFER uses plugins and links on its website, which complies with Art. 6 sec. 1 letter f) of the GDPR in order to make the KAEFER Group more known. Plug-ins and links are integrated by KAEFER using the so-called two-click method two-cliks. This is in order to protect visitors to the KAEFER website as much as possible.

The KAEFER website contains at least one plug-in from YouTube, owned by Google Inc. Just visiting the KAEFER website does not start the You Tube plugin. As a result, KAEFER has activated a remote data protection model for YouTube. Only by confirming (clicking) that you want to enable / connect / watch material on YouTube via a plug-in, the YouTube server will receive information about it. If you are logged in to YouTube you can allow connection directly from your profile. You can also log out of YouTube before visiting the KAEFER website. For more information, please read the YouTube privacy policy.

KA EFER uses the button to connect to the LinkedIn network in several places. It is only a link, not a so-called "Social plug". If you do not click on the button, no information will be sent to LinkedIn and thus no cookie will be stored on your device. As soon as you press the button without being logged in to LinkedIn, the login window will open in a new window after confirming your will to log in. This is the two-clicks method. In this case, it is possible that cookies may be embedded on your hard drive. KAEFER has no knowledge of the data and its use by LinkedIn. The pages connecting to LinkedIn are operated by LinkedIn Corporation. For more information, please read the LinkedIn privacy policy.

KAEFER uses Google Maps via the API. Provider is Google Inc. The integrated map system on the KAEFER website serves potential customers to make the journey to the company's premises as accurately as possible calculated in terms of time and distance. This is in line with Art. 6 sec. 1 letter f) GDPR.

To use the functions of Google Maps, you will need to save your IP address. Google publishes the so-called NID cookies in your device. This information is usually transferred to a Google server in the USA and stored there. The provider, for its part, has no influence on the data transmission. For more information, see Google's policy.

Before a KAEFER website retrieves data from Google Maps, you must first consent to the use of Google Maps, this is done by two-clicks on the KAEFER website. You also have the option to completely opt out of the mapping service and thus prevent data being transferred to the Google server. To do this, you must deactivate the JAVA SCRIPT program in your browser. In this case, the locator may no longer be used by you.

### **Data safety**

As soon as you know the KAEFER website, the SSL method is used in combination with the highest level of encryption supported by your browser. Typically this is 256 bit encryption. If your browser does not support 256-bit cipher KAEFER also uses 128-bit v3 technology. Whether or not a single page from a website is

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transmitted in encrypted form, it is defined by a locked screen with a key or a lock / padlock symbol in the bottom bar of your browser.

In addition, KAEFER also uses technical and organizational security measures to protect your data against single, occasional attacks or planned manipulations, such as loss or destruction or access to third parties. Protection measures are constantly improved in line with new technologies.

What are your rights?

In accordance with the regulations, you have:

- the right to access personal data and receive a copy thereof,
- the right to rectify (correct) personal data,
- the right to delete personal data, in cases justified by law,
- the right to transfer personal data, as long as it is technically possible,
- the right to limit the processing of personal data, in cases justified by law,
- the right to object to the processing of personal data,
- the right to lodge a complaint with the President of the Personal Data Protection Office.

1. Cookies are small text files saved by a web browser on the User's computer disk while browsing the Website.
2. Global Work Sp. z o. o. uses "cookies" in order to:
  - a. adjusting the content of the [www.globalwork.com.pl](http://www.globalwork.com.pl) website to the User's preferences and optimizing the use of websites;
  - b. supporting and enforcing activities allowing to maintain safety,
  - c. analysis of how the websites of Global Work Sp. z o. o
3. Pursuant to Article 173 (3) of the Telecommunications Law, after entering the website of the [www.globalwork.com.pl](http://www.globalwork.com.pl) website, information on the use of files by the website is displayed "Cookies".
  1. Global Work Sp. z o. o. uses the following types of "cookies":
    - a. necessary "cookies", i.e. files that enable the use of the Website
    - b. cookies used to ensure security,
    - c. cookies, enabling the collection of information on the use of the website pages,
    - d. "cookies", enabling "remembering" the settings selected by the User and personalizing the User interface .
  2. The available web browsers usually allow the storage of "cookies" on the user's end device by default. Users can change their cookie settings at any time. These settings can be changed in particular in such a way as to block the automatic handling of "cookies" in the web browser settings , or to inform about their every posting in the user's device of the website. Detailed information on the possibilities and methods of handling cookies is available in the web browser settings. Failure to change the settings for "cookies" means that they will be stored on the User's end device, and thus Global Work Sp. z o. o. will be able to store information on the User's end device and access this information.

### **VIII. PROTECTION OF THE SECURITY OF PERSONAL DATA**

The Personal Data Administrator introduces measures to ensure the protection of the User's personal data. Security is ensured by the systems and procedures used to prevent access and disclosure of personal data to unauthorized persons. The procedures and systems used by the Administrator are regularly monitored in order to detect possible threats. The collected personal data is stored in systems to which access is strictly limited.

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

In matters not covered by this Privacy Policy, the relevant provisions of generally applicable law shall apply. In the event of non-compliance of the provisions of this Privacy Policy with the above provisions, these provisions shall prevail.

Global Work Sp. z o. o . reserves the right to change this Privacy Policy by publishing a new Privacy Policy on the website [www.globalwork.com.pl](http://www.globalwork.com.pl). The rights of the User resulting from this Privacy Policy will not be limited without the consent of the User. Global Work Sp. z o. o. will keep the previous versions of the Privacy Policy in the archive to enable Users to read them.

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## **CONTACT**

In all matters related to this Privacy Policy, please contact us at:

**Global Work Sp. z o. o. with its seat in Zabrze (41-800), ul. Padlewskiego 6, e-mail address:  
info@globalwork.com.pl**

This update of the Privacy Policy shall enter into force on August 30, 2022.

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