



# eRECRUITMENT SOLUTIONS PRIVACY POLICY

in force from 17th June 2024

eRecruitment Solutions sp. z o.o. makes every effort to protect the privacy of the users of its services. This Privacy Policy sets out how we seek to protect your personal data and your interests.

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## I TERMS USED IN OUR PRIVACY POLICY

<b>eRecruiter Application</b>	a web application owned by eRecruitment Solutions, available at <a href="https://system.erecruiter.pl">https://system.erecruiter.pl</a> , enabling the Customer to independently control and manage the recruitment processes conducted and the candidate database. Pursuant to a separate agreement between eRecruitment Solutions and the Customer, the eRecruiter Application may be used by the Customer for other purposes not directly related to the performance of recruitment processes.
<b>eRecruitment Solutions, we, us, our, ours</b>	eRecruitment Solutions sp. z o.o., address: ul. Prosta 68, 00-838 Warszawa, e-mail address: <a href="mailto:kontakt@erecruiter.pl">kontakt@erecruiter.pl</a> .

<b>Customer</b>	a legal person, an organisational unit without legal personality, as well as a sole proprietorship, that has concluded a Service Agreement with eRecruitment Solutions.
<b>Account</b>	a channel making it possible to access the eRecruiter Application with the username and password or without logging in at the Customer-defined access permission levels for a natural person the Customer employs in any form, including on the basis of a civil law contract. The Customer may define permission levels including the following: administrator, recruiter, user, and business user.
<b>Candidate Account</b>	a service provided electronically for job candidates in accordance with the "Candidate Account" service rules available at <a href="#">here</a> .
<b>Partners</b>	participants of the partner program available at <a href="https://hrmarketplace.erecruiter.pl">https://hrmarketplace.erecruiter.pl</a> .
<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council 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).
<b>Platform or Platforms</b>	the platforms owned or managed by eRecruitment Solutions, within the framework of which eRecruiter Solutions performs its services. The platforms are available at: <a href="https://erecruiter.pl">https://erecruiter.pl</a> , <a href="https://system.erecruiter.pl">https://system.erecruiter.pl</a> , <a href="https://przyjaznarekrutacja.pl">https://przyjaznarekrutacja.pl</a> , <a href="https://rodowrekrutacji.pl">https://rodowrekrutacji.pl</a> , and <a href="https://hrmarketplace.erecruiter.pl">https://hrmarketplace.erecruiter.pl</a> .
<b>Service Agreement</b>	an agreement on the provision of a service consisting in access to the eRecruiter Application and to additional services, integral to the use of the eRecruiter Application.
<b>Test Access Agreement</b>	an agreement on the provision of a service consisting in free of charge access to the eRecruiter Application so that the user can see how the eRecruiter Application works and what functions it offers.
<b>Agreement</b>	collectively, the Service Agreement and the Test Access Agreement.
<b>User</b>	a natural person using the resources offered by the Platforms.

## II DATA CONTROLLER OF YOUR PERSONAL DATA AND OUR CONTACT DETAILS

eRecruitment Solutions is the data controller of your personal data in connection with the use of the Platforms, including the eRecruiter Application.



If you have any questions regarding the processing of your personal data or your rights, please contact:

a) us at [contact form](#) or

b) our Data Protection Officer at: [iod@pracuj.pl](mailto:iod@pracuj.pl).

## II PROCESSED PERSONAL DATA, PROCESSING PURPOSE AND LEGAL BASIS

We process your personal information as: (i) a Customer or a Customer's representative, (ii) a potential Customer or a potential Customer's representative, (iii) a User or (iv) a Partner, for different purposes, within different scopes and on various legal bases specified in the GDPR. In order to give you as clear information as possible, we have grouped these data by the purpose of processing.

### 1. AGREEMENTS WITH eRECRUITMENT SOLUTIONS

#### Request for contact regarding test access to the eRecruiter Application

**Purpose.** We process your personal data for the purpose of contacting you, providing additional information about the eRecruiter Application and inviting you to test the eRecruiter Application.

**Scope of data.** We process the personal data which you provided when using our online contact form. Our form indicates which information fields are mandatory, and which are optional. Filling out the fields marked as mandatory is required in order to use the service.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in promoting our eRecruiter Application in professional (business-to-business) relations and in making it possible for users to test it.

**Storage period.** For the above purpose, we process your data for no more than 3 years from the date of submission of the completed form. After that period, we will either erase your data/render your data anonymous, or keep processing your data for another purpose defined in this Privacy Policy.

#### Conclusion, performance and settlement of Agreements / performance of tax and accounting obligations / debt recovery and claims

**Purpose.** We process your personal data for the purpose of: (i) conclusion, performance and settlement of the Agreements, (ii) performance of our tax and accounting obligations related to the appropriate performance of the Agreements, including issuing and delivering invoices or e-invoices to you, (iii) collection of receivables resulting from the Agreements, and (iv) establishment, exercise or defence of claims resulting from the failure to perform or inappropriate performance of the Agreements.

**Scope of data.** We process your personal data which you provided using our Test Access Agreement form and our Service Agreement form. Moreover, we process your personal data such as: your first name and surname, your business e-mail address, business telephone number, job title and place of work, as well as data characterising the manner in which you use the eRecruiter Application within



the framework of the packages agreed with the Customer and the authorisation levels you have been granted within the framework of access to the eRecruiter Application (e.g. recruiter level).

**Legal basis.** (1) Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in establishing and maintaining business relations with Customer acting through their representatives and proxies, including correct determination of the amount of fees for the use of our services due from the Customers, the collection of receivables resulting from the Agreements and exercise or defence of claims in proceedings before courts or other state authorities connected with the conclusion and performance of the Agreements; (2) compliance with the legal obligations eRecruitment Solutions has (Article 6(1)(c) of the GDPR) under the provisions of the tax law (including the Tax Ordinance Act of 29 August 1997) and the provisions on keeping books of accounts (including the Accounting Act of 29 September 1994).

**Storage period.** For the above purposes, we process your personal data essentially for a period of no more than 3 years from the date of expiry or termination of the Agreement. In certain cases, we may process your data longer if required by the provisions of the applicable law. For the purposes of complying with tax and accounting obligations, we process your personal data for 5 years from the end of the calendar year in which the tax payment deadline expired for eRecruitment Solutions, and for a longer period if the limitation period for the tax liability is suspended or interrupted or if this is required under certain provisions of the applicable law.

## 2. USING THE eRECRUITER APPLICATION

### Ensuring security / using the eRecruiter Application functions

**Purpose.** We process your personal data for the purpose of authentication in the eRecruiter Application and to enable you to use the different functionalities of the eRecruiter Application at specific authorisation levels, including for the purpose of setting up a user profile in the eRecruiter Application.

**Scope of data.** We process your personal data that include: (i) the login name (set by the Customer when access rights are granted to the eRecruiter Application) and password you set up when logging into the eRecruiter Application, (ii) the data contained in the user profile set up in the eRecruiter Application, as well as (iii) the data related to your use of specific functionalities of the eRecruiter Application (e.g. data related to the submission of the interactive candidate card). If you use specific functions of the eRecruiter Application, we may also process data of other persons belonging to your organisation, for instance if the interactive candidate card is submitted, we process the e-mail addresses of the persons to whom you send the card.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR), consisting in ensuring security and control of access to the eRecruiter Application, as well as ensuring the possibility of using specific functions of the eRecruiter Application.

**Storage period.** For the above purposes, we process your personal data throughout the period of use of the eRecruiter Application (period in which you have the access rights), but not longer than for a period of 3 years from the date of the last login to the eRecruiter Application. After that period, we



will either erase your data/render your data anonymous, or keep processing your data for another purpose defined in this Privacy Policy.

## Monitoring activity in the eRecruiter Application

**Purpose.** We process your personal data for the purpose of developing the eRecruiter Application, ensuring technical support for the eRecruiter Application and keeping statistics related to the use of the eRecruiter Application, as well as for marketing purposes.

**Scope of data.** We process data concerning your activity in the eRecruiter Application, including information on how often you use eRecruiter Application functions and which ones they are.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR), consisting in the development of the eRecruiter Application, including improvement of its specific functions, as well as sending you marketing communication that matches your needs (such as information on how to use specific functions of the eRecruiter Application).

**Storage period.** For the above purposes, we process your personal data throughout the period of use of the eRecruiter Application (the period in which you have the access rights), but not longer than for a period of 3 years from the date of the last login to the eRecruiter Application. After that period, we will either erase your data/render your data anonymous, or keep processing your data for another purpose defined in this Privacy Policy.

## Chat in the eRecruiter Application

**Purpose.** We process your personal data for the purpose of providing answers to questions related to use of the eRecruiter Application, solving reported issues related to that, and notifying users about how to use specific functions of the eRecruiter Application in a better way.

**Scope of data.** We process your personal data such as your login name for the eRecruiter Application, your first name and surname, as well as the contents of the communication and enquiries.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR), consisting in improving the attractiveness of the eRecruiter Application, as well as facilitating contact with its users and using specific functions of the eRecruiter Application.

**Storage period.** For the above purpose, we process your personal data throughout the period of using the eRecruiter Application (the period in which you have the access rights). After that period, we will either erase your data/render your data anonymous, or keep processing your data for another purpose defined in this Privacy Policy.

## Candidate Account

**Purpose.** We process your personal data for the purpose of performing specific services and functionalities connected with the Candidate Account, including in particular to ensure functionalities that permit communicating with the employer.



**Scope of data.** We process your data contained in the communication with candidates exchanged within the scope of the Candidate Account.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR), consisting in the possibility to perform specific functionalities within the scope of the Candidate Account that require communicating with the employer.

**Storage period.** For the above purposes, we process your personal data throughout the period of using your Candidate Account and in compliance with the periods established for the Candidate Account in accordance with the Candidate Account Privacy Policy available [here](#).

### 3. USING OTHER PLATFORMS

#### How the eRecruiter Application works (DEMO)

**Purpose.** We process your personal data in order to enable you to familiarise yourself with the basic functions of the eRecruiter Application (DEMO version).

**Scope of data.** We process the personal data which you provided when using our online form. Our form indicates which information fields are mandatory, and which are optional. Filling out the fields marked as mandatory is required in order to use the service consisting in the presentation of the way in which the eRecruiter Application works.

If you have requested contact and a demonstration of the eRecruiter Application via the Strefa Pracuj.pl, we will process the provided data, namely: your first name, last name, email address, and the statistical data associated with your Pracuj.pl account, in order to tailor the DEMO version offer to your needs as effectively as possible.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in promoting the eRecruiter Application in professional (business-to-business) relations.

**Storage period.** For the above purpose, we process your data for no more than 3 years from the date of submission of the completed form. After that period, we will either erase your data/render your data anonymous, or keep processing your data for another purpose described in this Privacy Policy.

#### Access to training, reports and e-books

**Purpose.** We process your personal data for the purpose of making training materials we develop, such as articles, guides, webinars and reports, available to you, and for the purpose of signing you up for training which we organise.

**Scope of data.** We process the personal data which you provided when filling out one of our online forms. Our forms indicate which information fields are mandatory, and which are optional. Filling out the fields marked as mandatory is required in order to use our services.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in building trust in our knowledge and experience in the field of recruitment in professional (business-to-business) relations,



if you inform us that you are willing to attend specific training courses or webinars, or that you want to receive e-books.

**Storage period.** For the above purpose, we process your data for no more than 3 years from the date of submission of the completed form. After that period, we will either erase your data/render your data anonymous, or keep processing your data for another purpose described in this Privacy Policy.

## Newsletter

**Purpose.** We process your personal data for the purpose of updating you on events we organise, training and promotional materials we develop (such as articles, guides, webinars and reports), marketing research we carry out, and our product and service offering. We send this information in the form of a newsletter.

**Scope of data.** Your business e-mail address.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in promoting our initiatives in the field of recruitment in professional (business-to-business) relations, if you express consent to receive such information by e-mail in the form of a newsletter.

**Storage period.** For this purpose, we process your personal data until you opt out of receiving the newsletter. After that period, we will either erase your data/render your data anonymous, or keep processing your data for another purpose described in this Privacy Policy.

## Participation in works on the Code of Personal Data Protection in Recruitment (the Code)

**Purpose.** We process your personal data for the purpose of ensuring participation in the work of the Working Group on the Code or ensuring the possibility of observing the work of such a group (depending on how you choose to participate in the development of the Code), including sending you all kinds of materials and invitations to attend educational events related to the development of the Code.

**Scope of data.** We process your personal data which you provided in the application form for participation in the work on the Code. The form indicates which information fields are mandatory, and which are optional. Filling out the fields marked as mandatory is required in order to apply to participate in the development of the Code.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in disseminating information concerning good practices related to the processing of personal data in recruitment, if you applied to participate in the development of the Code.

**Storage period.** For this purpose, we will process your personal data until completion of work on the Code or until the working group on the Code is dissolved, unless you abandon work on the Code earlier.

## Signing up your company for participation in the Coalition for Friendly Recruitment



**Purpose.** We process your personal data for the purpose of contacting you about your company's membership in the Coalition for Friendly Recruitment.

**Scope of data.** We process the personal data which you provided when using our online form. Our form indicates which information fields are mandatory, and which are optional. Filling out the fields marked as mandatory is required to sign up your company to participate in the Coalition for Friendly Recruitment.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in dissemination of knowledge about our initiatives related to self-regulation of the recruitment services market in professional (business-to-business) relations, if you have signed up your company to participate in the Coalition for Friendly Recruitment.

**Storage period.** For this purpose, we process your personal data for a period not longer than the time when your company participates in the Coalition for Friendly Recruitment.

## Facebook Messenger chatbot

**Purpose.** We process your personal data for the purpose of answering your questions about the HR market, asked through our chat in the Facebook Messenger application.

**Scope of data.** We process your personal data including your first name and surname or another Facebook user ID, profile photo, gender, time zone data, and Facebook language settings (to the extent in which such data are public on your Facebook profile). In addition, we process your personal data concerning the way in which you use the chat service, including the date and the manner in which you contacted us and the date of your last activity, as well as the personal data contained in the enquiries sent to us via chat.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR), consisting in increasing the attractiveness of our Platform by making available a tool enabling easy access to information on aspects related to the HR market.

**Storage period.** For this purpose, we process your personal data until you opt out of receiving messages via the Chatbot. After that period, we will either erase your data/render your data anonymous, or keep processing your data for another purpose described in this Privacy Policy.

## Marketing of our products and services

**Purpose.** We process your personal data for the purpose of offering you our products and services that best match your professional interests.

**Scope of data.** We process your personal data including: your first name, surname, e-mail address, telephone number, name and address of your employer and job title within the company, which you provided for instance by filling out one of the forms we use in connection with the presentation of the way in which the eRecruiter Application works, providing access to training, reports and e-books, and in connection with the sending of the newsletter. In addition, we process data collected automatically through cookies concerning your activity on the Platforms, e.g. Platform visit frequency, the list of subpages of the Platforms which you visited, information about downloaded educational materials.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in direct marketing of our own products and services in professional (business-to-business) relations. In addition, we will contact you by e-mail or by telephone for the purpose of marketing our products and services, if you have expressed consent to communication by e-mail or telephone for the purpose of receiving such information from eRecruitment Solutions, or consent concerning cookies expressed through the relevant settings in your browser. Having considered our interest as well as your interests, rights and freedoms, we decided not to interfere excessively in your privacy.

**Storage period.** For this purpose, we process your personal data until you opt out of receiving marketing/commercial information from eRecruitment Solutions (withdrawal of consent or objection), but for no longer than 3 years from the date when we record your last activity related to eRecruitment Solutions marketing events and campaigns organised online or offline.

Your activity means any activity that may indicate your interest in eRecruitment Solutions marketing campaigns or services, e.g. participation in a marketing campaign (conference, training, satisfaction survey), opening advertising mailing, visiting an eRecruitment Solutions webpage or using eRecruitment Solutions services. Within 3 years of your last activity, your personal data will no longer be actively processed but only stored. After that time, your personal data will be erased/rendered anonymous.

You will find more about profiling below in the section entitled *Profiling your preferences and interests*.

## Social media

If you visit our profiles, including but not limited to our social media fan pages (e.g. on Facebook, Instagram, LinkedIn), which involves taking part in various activities we organise in the social media (e.g. competitions, promotional campaigns, consulting, Q&A), we will process your personal data collected through such media, including your name and surname, user name, profile photo (avatar), and information contained in your posts and comments.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in building a positive relationship with our Customers and their representatives in social media or in marketing our products and services, including but not limited to organising various competitions and other promotional campaigns addressed to employers.

You can find more information regarding the processing of your personal data further to your visits to our social media profiles in **Information for Information for the users of our social media profiles**.

## Partner program

**Purpose.** We process your personal data to pursue the partner program available at <https://hrmarketplace.erecruiter.pl>.

**Scope of data.** We process your personal data which you have provided using our online form (including but not limited to your name and surname, business contact data, name of the organisation you work at, Tax Identification Number NIP) and in contacting us within the scope of participating in the partner program.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR), consisting in organising the partner program and permitting testing the eRecruiter App for the purpose of pursuing the partner program.



**Storage period.** For this purpose, we process your personal data no longer than for the period of participating in the partner program.

## **Statistics on the use of specific functionalities of the Platforms, facilitating the use of the Platforms, and ensuring IT security of the Platforms**

**Purpose.** We process your personal data for the purpose of compiling statistics on the use of specific functionalities of the Platforms, facilitating use of the Platforms, and ensuring IT security of the Platforms.

**Scope of data.** We process personal data concerning your activity on the Platforms, such as: the pages and subpages of the Platforms you visit and the amount of time you spend on each of them, as well as data concerning your search history, your IP address, location, device ID, and data concerning the browser and the operating system.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR), consisting in facilitating use of services provided electronically and in improving the functionality of those services.

**Storage period.** For the above purpose, we process your personal data for no more than 3 years.

## **Establishing, pursuing and defending against claims**

**Purpose.** We process your personal data for the purpose of establishing, pursuing and defending against claims, including claims for damage caused by unauthorised use of the Platforms.

**Scope of data.** We process your personal data including: your first name, surname, e-mail address, data concerning the use of the Platforms and other data necessary to prove the existence of a claim, including the extent of damage caused.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in establishing, pursuing and defending against claims in proceedings before courts or other state bodies.

**Storage period.** For the above purpose, we process your data for no more than 3 years from the date when you ceased using our Platforms. In certain cases, we may process your data longer if required by the provisions of the applicable law.

## **Handling complaints and requests, responding to enquiries**

**Purpose.** We process your personal data for the purpose of examining and processing complaints and requests as well as of responding to enquiries.

**Scope of data.** We process your personal data, including your first name, surname, e-mail address and data concerning the use of the eRecruiter Application or other Platforms which gave rise to the relevant complaint, request, or inquiry. Furthermore, we process your personal data contained in your complaint, request, or inquiry.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in improving the functioning of our services provided electronically and in building positive relations with Users and Customers, based on reliability and loyalty.



**Storage period.** For the above purpose, we process your personal data until your complaint or request has been examined and handled, or until your question has been answered, for no longer than 3 years from their submission.

## IV PROFILING YOUR PREFERENCES AND INTERESTS

For the purpose of conducting direct marketing of our products and services, we create a profile of your professional interests and preferences, in such a way as to match the marketing communication to it in the best possible manner, including our offers related to specific eRecruitment Solutions products and services we invite you to acquire. We evaluate your preferences and interests on the basis of the information collected automatically through cookies concerning your activity on the Platforms, and, if you use the eRecruiter Application, also data concerning your activity in the eRecruiter Application. Our profiling practices results in personalised marketing communication being displayed, concerning eRecruitment Solutions products and services. Our communication may be displayed on webpages of parties unrelated to us using the Google advertising network (e.g. Google Adwords) or Facebook.

Our activity concerns only professional relations. We do not collect information that would enable us to gain insight into your private life. On the contrary, we only collect information related to your professional activity, and we do so to a very limited extent. We are only interested in your activity on the Platforms. The information which is collected is not combined with information from other sources, including information concerning your activity on webpages other than the webpages that are part of the Platforms.

**Legal basis.** Our legitimate interest (Article 6(1)(f) of the GDPR) consisting in the marketing of our products and services which you will find attractive and which will match your needs and interests.

For more information on the use of cookies by eRecruitment Solutions, please refer to our [Cookies Policy](#).

## V WHO WE SHARE YOUR PERSONAL DATA WITH

### Service providers

We transfer your personal data to our providers of CRM services (Salesforce, Pardot), analytical services (e.g. Google Analytics, Google Tag Manager), online marketing systems (e.g. Google Adwords, Facebook Pixel), services ensuring the security of the eRecruiter Application (Cloudflare), chat services (Facebook Messenger, Intercom), hosting services (Oktwave, Microsoft Azure, AWS and Google Cloud), management and accounting process support services (Navision, Microsoft Dynamics NAV), support services for handling user requests (Zendesk), videoconference and meeting administration services (Google Meet – you share your event/meeting calendar with us for the purposes of adding meetings, the meeting arrangement service; Google Calendar – you share your calendar enabling us to display and edit events and check the availability of people and rooms; the detailed information regarding data processing by Google can be found [here](#)) and our partner – Softgarden e-recruiting GmbH if you use Career Site Pro. Most of our service providers are based in Poland and in other countries of the European Economic Area (EEA), e.g. Ireland. Some of our service providers are based outside the EEA. In connection with the transfer of your data outside the EEA territory, we have made sure that our suppliers 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 and from adequacy decisions issued by the (EU) Commission (e.g. Privacy Framework regarding transfers to the United States).

You have the right to request a copy of the standard contractual clauses from us by submitting an enquiry as indicated in section II of the Privacy Policy.

### **State bodies**

We make your personal data available if requested to do so by authorised state bodies, including in particular organisational units of the prosecutor's office, the Police, the President of the Personal Data Protection Office or the President of the Office of Electronic Communications.

## **VI YOUR RIGHTS WITH REGARD TO THE PROCESSING OF YOUR PERSONAL DATA**

We ensure the exercise of your rights as indicated below. You may exercise your rights by contacting us in the manner set out in section II of the Privacy Policy.

### **Right to withdraw consent**

You have the right to withdraw your consent if we process your personal data on the basis of your consent. Withdrawal of consent has future effect only and does not affect processing we carried out in a lawful manner prior to such withdrawal.

Legal basis: Article 7(3) of the GDPR

### **Right to object to the use of data**

You have the right to object at any time to the processing of your personal data, including profiling, if we process your data on the basis of our legitimate interest (e.g. in the case of marketing of our products and services).

If you have objected to the processing of your data for marketing purposes, we will cease processing your data for such purposes. The same applies to the objection to the processing of your data for purposes other than marketing, if the objection proves to be justified and we have no other legal basis for further processing of your personal data.

Legal basis: Article 21 of the GDPR

### **Right to erasure ("right to be forgotten")**

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

- a) you have withdrawn specific consent within the scope in which the personal data were processed on the basis of your consent;
- b) your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;



- c) you have objected to the processing of your data for marketing purposes;
- d) you have objected to the processing of your data on the basis of our legitimate interest (e.g. against the use of your data for the purpose of keeping statistics on the use of the Platforms and satisfaction surveys), and the objection has been considered justified;
- e) your personal data have been processed unlawfully.

Despite the request to erase your personal data, in connection with your objection or withdrawal of consent, we may retain certain personal data to the extent necessary for establishment, exercise or defence of claims. This applies in particular to personal data such as your name, email address, telephone number and the history of your activity in the eRecruiter Application, which we retain for the purpose of handling complaints and claims related to your use of our services.

Legal basis: Article 17 of the GDPR

## Right to restriction of processing

You have the right to request the restriction of processing of your personal data. If processing is restricted, we temporarily refrain from processing your personal data the request concerns, and we make it impossible for other users to access the data. This means that if you submit such a request, then, until it has been handled, we will make it impossible for you to use certain functionalities of the Platforms, if their use involves processing of the data covered by the request. We will also refrain from sending communication to you, including marketing communication.

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

- a) if you contest the accuracy of your personal data – in that case we restrict their use for a period enabling us to verify the accuracy of your personal data, but for no longer than 7 days;
- b) if the processing of your personal data is unlawful, and you request the restriction of their use instead of their erasure;
- c) if your personal data are no longer necessary for the purposes for which we collected or used them, but you require them for the establishment, exercise or defence of claims;
- d) if you have objected to the use of your personal data for purposes other than marketing ones – the restriction takes place for the period required to determine whether, due to your specific situation, the protection of your interests, rights and freedoms overrides the interests we pursue when processing your personal data.

Legal basis: Article 18 of the GDPR

## Right of access

You have the right to obtain confirmation from us of whether we process your personal data, and if this is the case, you have the right to:

- a) obtain access to your personal data;
- b) obtain information about the purposes of processing, the categories of the personal data processed, the recipients or categories of recipients of the personal data, the planned period of storage of your data or the criteria of determining that period, the rights you have under the GDPR, and the right to lodge a complaint with a supervisory authority, the source of the data, automated decision-making, including profiling, and the safeguards applied in relation to the transfer of such data outside the European Union;
- c) obtain a copy of your personal data.



Legal basis: Article 15 of the GDPR

## Right to rectification

You have the right to rectify and to complete the personal data you provided. You may do so by submitting an enquiry in the manner indicated in section II of the Privacy Policy. In relation to other personal data, you have the right to request that we rectify those data (if they are incorrect) and complete them (if they are incomplete).

Legal basis: Article 16 of the GDPR

## Right to data portability

You have the right to receive the personal data you provided to us, and then to transmit those data to another data controller of your choice, e.g. to a different operator of similar websites, if we process your data on the basis of your consent or within the scope required to perform the agreement. You also have the right to request that the personal data be sent by us directly to such other controller, provided that this is technically feasible.

We will send your personal data in the form of a .csv file. The .csv format is commonly used, machine-readable and makes it possible to send the data received to another personal data controller.

Legal basis: Article 20 of the GDPR

## Request fulfilment time

1. If you submit a request to us in exercise of the rights indicated above, we fulfil the request or refuse to fulfil it immediately, but in any case not later than within one month of receiving it. However, if, due to the complexity of your request or the number of requests, we are unable to fulfil your request within one month, we will do so within the following two months, providing information to you in advance about the planned extension of the deadline.
2. For technical reasons, we need up to 48 hours to update the settings you have selected in our systems. Therefore, you may receive an e-mail from us during the system update, even if you have opted out of receiving such e-mails.

## Submitting complaints, inquiries, and requests

You may submit complaints, enquiries and requests to us regarding the processing of your personal data and requests regarding the exercise of your rights.

You can submit all complaints, enquiries and requests to the following e-mail address: [kontakt@erecruiter.pl](mailto:kontakt@erecruiter.pl). In addition, you may submit your objection or withdraw your consent by changing the settings in the Communication Preferences Centre, a link to which is included in the e-mails sent by eRecruitment Solutions.

If you believe that your right to the protection of personal data or other rights granted to you under the GDPR have been infringed, you have the right to lodge a complaint with the President of the Personal Data Protection Office ([www.uodo.gov.pl](http://www.uodo.gov.pl)).



## **VII HOW WE LOOK AFTER THE SECURITY OF YOUR PERSONAL DATA**

We make every effort to ensure the security of your personal data. The Platforms use encrypted data transmission (SSL) in the signup and login process, which ensures protection of data that identify you and makes it significantly more difficult for unauthorised systems or individuals to intercept access to the eRecruiter Application.

## **VIII HOW WE USE COOKIES**

For details on how we use cookies, please refer to the [Cookies Policy](#).

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

We may amend and supplement this Privacy Policy as necessary. We will inform you of any changes or additions by posting relevant information on the main pages of the Platforms, and in the event of material changes, we may also send you separate notices to the e-mail address you provided.