



PRIVACY POLICY

DCG SP. Z O.O. WITH ITS SEAT IN WARSAW

This document contains detailed information on the processing of Personal Data by the Website Administrator <https://d cg.pl/>

§ 1. DEFINITIONS

Phrases and expressions formulated in this Privacy Policy have the following meanings:

1. Administrator – means the Administrator of Personal Data, i.e. an entity alone or jointly with others that determines the purposes and methods of personal data processing (in accordance with Article 4(7) of the GDPR).
2. Processing – means an operation or a set of operations performed on personal data or sets of personal data (in accordance with Article 4(2) of the GDPR), which, as part of the Administrator’s activities, concern three basic categories of natural persons:
 - CANDIDATES, i.e. persons who do not cooperate with the Administrator on a regular basis, whose data the Administrator processes for the purposes of ongoing, future or potential recruitment projects,
 - COLLABORATORS OF THE ADMINISTRATOR, i.e. persons whose data the Administrator processes in connection with constant cooperation with the Administrator on the basis of various legal relationships, in particular employees and contractors of the Administrator,
 - EMPLOYEES OF THE ADMINISTRATOR’S CLIENTS, i.e. persons employed by the Administrator’s customers (contractors) or potential customers, regardless of the legal basis of employment, including representatives of customers whose data the Administrator processes in connection with their disclosure to the Administrator for the purposes of the performance of contracts or submission of offers between the Administrator and their customers.
3. Personal Data – means any information about an identified or identifiable natural persons (“data subjects”) within the meaning of Article 4, point 1 of GDPR; an identifiable natural person is a person who can be identified, directly or indirectly.
4. 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 Regulation on Data Protection).
5. Website – a broadly understood website available at <https://d cg.pl/>, including related websites, social profiles, functionalities and applications.
6. User – a natural person using the Website.

§ 2. GENERAL INFORMATION

1. The Personal Data Administrator is DCG Sp. z o. o. with its registered office in Warsaw, Towarowa Street 28, 00-839 Warsaw, entered into the Register of Entrepreneurs



kept by the District Court for the CapitalCity of Warsaw, 12th Commercial Division of the National Court Register, KRS number: 0000733458, NIP: 5222877930.

2. In matters related to the protection of personal data, anyone may contact the Administrator by traditional mail to the address of the Administrator's registered office or by e-mail to the following address: gdpr@dco.pl

§ 3. SECURITY

1. The Administrator takes every effort to protect Personal Data against unauthorized access by third parties and in this respect applies organizational and technical security measures, in particular:
 - a) internal restrictions on access to Personal Data in accordance with the principle of necessary availability,
 - b) cyclical testing of the IT infrastructure in terms of security,
 - c) cryptographic methods,
 - d) internal controls and audits of collected Personal Data,
 - e) storage and processing procedures as well as physical and IT security measures to protect against unauthorized access to the systems.
2. The Administrator does not provide Personal Data to any unauthorized recipients in accordance with the mandatory provisions of law or this Privacy Policy.

§ 4. CANDIDATES

1. The Administrator processes CANDIDATES' Personal Data for the following purposes and on the following grounds:
 - a) purposes related to conducting recruitment processes for the purposes of the Administrator of Employees, contractors or other potential collaborators – the basis for processing is the consent of the data subject (Article 6(1)(b) of the GDPR) and the need to fulfill the legal obligation incumbent on the Administrator (Article 6(1)(c) of the GDPR),
 - b) purposes related to conducting recruitment processes by the Administrator for the Administrator's clients or potential clients – the basis for processing is the consent of the data subject (Article 6(1)(a) of the GDPR),
 - c) purposes related to determining, investigating or defending against any claims that may arise from contracts concluded with the Administrator or their clients – the basis for processing is the implementation of the Administrator's legitimate interest (Article 6(1)(f) of the GDPR).
2. The Administrator processes the following Personal Data of CANDIDATES:
 - a) data necessary to carry out the recruitment process of the Administrator's employees listed in art. 221 of the Labor Code, in particular name, surname, date of birth, data on education, skills, professional experience (school and university studies completed, previous and current employers, positions held and professional duties),
 - b) data collected in the recruitment process of the Administrator's employees other than



those listed above and provided to the Administrator, in particular those contained in letters of intent, CVs (telephone number, e-mail address, etc.), provided in the course of negotiations with the Administrator, etc.

- c) data provided in surveys or forms (e.g. newsletter) posted on the Website for the purposes listed there other than employment with the Administrator, in particular name and surname, contact details, data on education, skills, professional experience (schools and studies graduated from, trainings and courses completed, previous and current employers, positions held and professional duties),
3. CANDIDATE'S Personal Data may be transferred in particular to the following recipients (entities):
- a) providing services in the field of electronic recruitment platforms,
 - b) providing services in the field of operation, maintenance and management of the IT network and end services,
 - c) providing technical support services for applications in which Personal Data is processed,
 - d) the Administrator's clients (potential employers).

§ 5. ADMINISTRATOR'S COLLABORATORS

1. The Administrator processes Personal Data of ADMINISTRATOR'S COLLABORATORS for the following purposes and on the following grounds:
 - a) purposes related to the performance of contracts concluded by these persons with the ADMINISTRATOR – the basis for processing is the necessity of Personal Data to perform the contract or take action at the request of the data subject before concluding the contract (Article 6(1)(b) of the GDPR) and the need to fulfill the legal obligation incumbent on the Administrator (Article 6(1)(c) of the GDPR);
 - b) providing Personal Data to the Administrator's contractors – the basis for processing is the implementation of the Administrator's legitimate interest (Article 6(1)(f) of the GDPR),
 - c) purposes related to determining, investigating or defending against any claims that may arise from contracts concluded with the Administrator or its clients – the basis for processing is the implementation of the Administrator's legitimate interest (Article 6(1)(f) of the GDPR).
2. The Administrator processes the following Personal Data of ADMINISTRATOR'S COLLABORATORS:
 - a) data necessary for the performance of contracts with the Administrator or its clients, listed in particular in Article 221 of the Labor Code, in particular name, surname, date of birth, data on education, skills, professional experience (schools and studies graduated from, trainings and courses completed, positions held and professional duties),
 - b) data collected in the recruitment process other than those listed above and provided to the Administrator, in particular those contained in letters of intent, CV (telephone number, e-mail address, etc.), provided in the course of negotiations with the



Administrator,

3. Personal data of the ADMINISTRATOR'S COLLABORATORS may be transferred in particular to the following recipients (entities):
 - a) providing services in the field of electronic recruitment platforms,
 - b) providing services in the field of operation, maintenance and management of the IT network and end devices,
 - c) providing technical support services for applications in which Personal Data is processed,
 - d) the Administrator's clients (potential employers).

§ 6. EMPLOYEES OF ADMINISTRATOR'S CLIENTS

1. The Administrator processes Personal Data of EMPLOYEES OF ADMINISTRATOR'S CLIENTS for the following purposes and on the following grounds:
 - a) purposes related to the acquisition of business clients and contact in order to present an offer – the basis for processing is the implementation of the Administrator's legitimate interest (Article 6(1)(f) of the GDPR);
 - b) purposes related to the conclusion and implementation of contracts with the Administrator's clients – the basis for processing is the implementation of the Administrator's legitimate interest (Article 6(1)(f) of the GDPR),
 - c) purposes related to determining, investigating or defending against possible claims that may arise from contracts concluded with clients – the basis for processing is the implementation of the Administrator's legitimate interest (Article 6(1)(f) of the GDPR),
2. The Administrator processes the following Personal Data of EMPLOYEES OF ADMINISTRATOR'S CLIENTS:
 - a) data necessary for contact, in particular provided to the Administrator by the Administrator's clients or data subjects, in particular: name, surname, telephone number, e-mail address, etc.
3. Personal data of EMPLOYEES OF ADMINISTRATOR'S CLIENTS may be transferred in particular to the following recipients (entities):
 - a) providing services in the field of operation, maintenance and management of the IT network and end devices,
 - b) providing technical support services for applications in which Personal Data is processed,
 - c) associates and employees of the Administrator.

§ 7. OTHER AREAS OF PROCESSING

1. The Administrator also processes Personal Data for purposes other than those described in §4-6 above, in particular:
 - a) purposes related to the provision of services within the Website, i.e. taking action in connection with the User's request, in particular in order to prepare an answer to a question or to prepare a dedicated offer – the basis for processing is the necessity of possessing these data to be able to provide Services (Article 6 paragraph 1, letter b GDPR),



- b) purposes related to ongoing contact – processing is based on the Administrator’s legitimate interest (Article 6(1)(f) of the GDPR),
 - c) purposes related to the management of the Website and the analysis of data collected therein – processing is carried out on the basis of the Administrator’s legitimate interest (Article 6(1)(f) of the GDPR),
 - d) purposes related to direct marketing – processing is based on a legitimate interest (Article 6(1)(f) of the GDPR). Conducting direct marketing communication may also take place on the basis of Article 10 of the Act of 18th July 2002 on the provision of electronic services or on the basis of the consent of the data subject to send commercial information by means of electronic communication or Article 172 of the Act of July 16, 2004, Telecommunications Law,
 - e) purposes related to maintaining profiles in social media and online, such as e.g. Facebook, Instagram, LinkedIn, Twitter – processing is based on the Administrator’s legitimate interest (Article 6(1)(f) of the GDPR),
 - f) purposes related to running the newsletter – the processing of Personal Data is based on the Administrator’s legitimate interest (Article 6(1)(f) of the GDPR), in accordance with Article 10 of the Act of 18 July 2002 on the provision of electronic services and Article 172 of the Act of July 16, 2004 Telecommunications Law.
2. After appropriate notification by the Administrator, Personal Data may also be processed for other purposes, and this may be done on the basis of:
- a) voluntarily expressed consents by the data subjects (Article 6(1)(a) of the GDPR),
 - b) applicable law – when processing is necessary for the Controller to fulfill a legal obligation (Article 6(1)(c) of the GDPR),
 - c) indispensability for purposes other than those listed above resulting from legitimate interests pursued by the Administrator or by a third party (Article 6(1)(f) of the GDPR).
3. Providing Personal Data is voluntary, however, it is a condition for the provision of services on the part of the Administrator or the conclusion of a contract with the Administrator, it may also be required by law. The data subject is each time informed by the Administrator in the appropriate information clause about the voluntary nature or the need to disclose certain Personal Data to the Administrator.
4. Personal data of CANDIDATES, COLLABORATORS OF THE ADMINISTRATOR and EMPLOYEES OF ADMINISTRATOR’S CLIENTS will not be transferred to countries outside the EU and to international organizations. These Personal Data will not be subject to automated decisions (decisions without human participation), nor will they be subject to profiling.

§8 OTHER CASES OF TRANSFERING PERSONAL DATA

1. In cases other than those described in §4-6 of this Privacy Policy and to the extent it is justified by the purpose of processing, the Administrator will transfer Personal Data to entities that act on its behalf, i.e. providers of IT services and solutions, consultants providing accounting, legal, financial, insurance and administrative services, auditors, entities conducting customer satisfaction surveys at the request of the Administrator, entities



providing customer service at the request of the Administrator, entities providing services in the field of sending messages, advisor and entities providing the tools referred to in point XI of this Privacy Policy (Cookies).

2. If it is required by law or necessary to pursue or defend against claims, the Administrator may transfer Personal Data to public authorities, including courts, prosecutor's offices or the police, and professional attorneys (these entities will become separate administrators of Personal Data in such a situation).
3. Personal Data may be transferred to entities processing them at the request of the Administrator, and such entities process Personal Data on the basis of an appropriate contract for entrusting the processing of personal data concluded with the Administrator and in accordance with the Administrator's instructions.

§ 9. PERSONAL DATA PROCESSING PERIOD

1. To the extent that Personal Data is processed by the Administrator for the performance of the contract, the Administrator will process it for the duration of the contract.
2. To the extent that Personal Data is processed for the implementation of the Administrator's legitimate interests, they will be processed for the duration of the legitimate interest, unless the data subject objects to the processing of such data earlier. If the Administrator can demonstrate the existence of important, legally justified grounds for further processing of these data, overriding the rights of the person, or necessary to establish, pursue or defend claims, defend the Administrator's position in criminal, administrative or misdemeanor proceedings, as well as counteract possible abuse or fraud, the Administrator will process them despite the objection (this does not apply to the person's objection to processing for direct marketing purposes, which does not require justification).
3. To the extent that Personal Data are processed based on the consent of the person to whom they relate, they will be processed until the consent is withdrawn.
4. To the extent that Personal Data is processed for the purpose of fulfilling the Administrator's obligations under the law (e.g. from the Act on Accounting, the Labor Code, Tax Regulations or the GDPR), they will be processed for the period resulting from such regulations.
5. To the extent that Personal Data is processed for the purpose of establishing or pursuing claims, as well as in order to defend against such claims, they will be processed for the period of limitation of the claims of the data subject or the Administrator's claims.

§ 10. RIGHTS OF THE DATA SUBJECTS

1. In connection with the processing of Personal Data, the data subject has the following rights:
 - a) the right to request access to their Personal Data;
 - b) the right to request rectification of their Personal Data if they believe that the data is incorrect or incomplete;
 - c) the right to request the deletion of their Personal Data if: (i) the data is no longer necessary for the purposes for which it was collected by the Administrator; (ii) the data subject has withdrawn their consent to the processing of Personal Data and the



Administrator has no other legal basis to process such Personal Data; (iii) the data subject objects to the processing of Personal Data and on the part of the Administrator there are no overriding legitimate grounds for processing despite the objection, or the person objects to the processing of Personal Data for direct marketing purposes; (iv) the Personal Data has been unlawfully processed; (v) Personal Data should be deleted in order to fulfill the obligation resulting from the law.

The right to delete data does not apply to Personal Data processed on the basis of applicable law or data processed in order to establish, defend, pursue any claims.

- d) the right to request restriction of the processing of Personal Data if: (i) the data subject notices that the Personal Data is incorrect – you can request restriction of the processing of your Personal Data for a period allowing the Administrator to check the correctness of this data; (ii) the Personal Data are processed unlawfully, but the data subject does not want them to be deleted by the Administrator; (iii) Personal Data are no longer needed by the Administrator, but may be needed by the data subject to establish, pursue or defend claims; (iv) the data subject objects to the processing of data – until it is determined whether the legitimate grounds existing on the part of the Administrator override the grounds for objection;
 - e) the right to object to the processing of Personal Data, if the processing is based on the legitimate interest of the Administrator, and the objection is justified by the data subject's special situation.
2. The data subject also has the right to withdraw consents based on which the Administrator processes Personal Data and consents to the use of the e-mail address and telephone number for marketing activities, while the withdrawal of consent does not affect the legality of the activities performed prior to withdrawal of consent.
 3. In order to exercise the above-mentioned rights, please contact the Administrator at the e-mail address indicated in this Privacy Policy.
 4. The data subject also has the right to lodge a complaint when they consider that the processing of Personal Data violates the provisions of the GDPR. The complaint should be lodged with the supervisory body which from May 25, 2018 is the President of the Office for Personal Data Protection.

§ 11. COOKIES

1. Cookies (cookies files or http cookies) are small pieces of text that the Website sends to the browser and which the browser sends back upon the next access to the Website.
2. Cookies are stored in the memory of devices and read by the server each time one connects to the Website.
3. Cookies do not contain information enabling third parties to learn the User's Personal Data or contact them, e.g. by e-mail or telephone.
4. By using the Website without changing the software (browser) settings, the User agrees to save Cookies in their end device and to use the information stored in them.



5. Additional information about Cookies can be found at <https://www.aboutcookies.org/> or <https://wszystkoociasteczkach.pl>
6. The legal basis for collecting data read from Cookies is Article 5 sec. 1 letter f of GDPR, allowing the processing of personal data for the implementation of the legally justified interest of the data controller. These include in particular:
 - a) ensuring proper and safe operation of the Website for the User and their device,
 - b) adapting the Website to the User's individual settings and remembering the data entered by the User related to the use of the Website, e.g. choosing to save Cookies on the user's device or remembering the password,
 - c) conducting statistical analyzes regarding Users visiting the Website, e.g. website visit statistics, which will serve to improve the effectiveness of marketing activities conducted by the Administrator and build a business strategy,
 - d) advertising and promotion, distribution of information and advertising materials via the Website.
7. When using the Website, the User remains anonymous until they decide otherwise. The information contained in the system logs (e.g. IP address) is used by the Administrator for technical purposes related to the administration of servers. In addition, IP addresses are used to collect general, statistical demographic information, such as the region from which Users connect.
8. The website uses the following cookies and the following tools:
 - a) AddThis
 - b) Google Analytics
 - c) Facebook
9. The User may at any time resign from collecting Cookies by changing the settings in the Internet browser they use when connecting to the Website. In this case, it may be difficult or impossible to use all the functions of the website. Additional information can be found under the following links:
 - a) Google Chrome – <https://support.google.com/chrome/answer/95647>
 - b) Firefox – <https://support.mozilla.org/pl/kb/wylaczenie-ciasteczek-pochodzacych-z-innych-witryn>
 - c) Safari – <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>
 - d) Opera – <https://help.opera.com/pl/latest/web-preferences/#cookies>

§ 12. CONTACT WITH THE ADMINISTRATOR

The data subject may contact the Administrator in any matter regarding Personal Data in the following way:

1. by sending a message to the e-mail address: gdpr@dco.pl
2. by traditional correspondence to the following address: DCG Sp. z oz o.o., with its registered office in Warsaw at Towarowa Street 28, 00-839 Warsaw.