



PRIVACY POLICY

of DCG Sp. z o.o. with its registered office in Warsaw

This document contains detailed information on the processing of Personal Data by the Controller of the Service at <https://dcg.pl/>

§ 1. DEFINITIONS

The terms and expressions used in this Privacy Policy have the following meanings:

1. Controller - means the controller of Personal Data, namely the entity which, alone or jointly with others, determines the purposes and means of the processing of personal data, in accordance with Article 4(7) GDPR.
2. Processing - means an operation or set of operations performed on personal data or on sets of personal data, in accordance with Article 4(2) GDPR, which, as part of the Controller's activity, concern three main categories of natural persons:
 - CANDIDATES, meaning persons who do not cooperate permanently with the Controller and whose data are processed by the Controller for ongoing, future or potential recruitment projects;
 - CONTROLLER'S ASSOCIATES, meaning persons whose data are processed by the Controller in connection with permanent cooperation with the Controller on the basis of various legal relationships, in particular employees and contractors of the Controller;
 - EMPLOYEES OF THE CONTROLLER'S CLIENTS, meaning persons employed by the Controller's clients, contractors or potential clients, regardless of the legal basis of employment, including representatives of clients whose data are processed by the Controller in connection with their disclosure to the Controller for the purposes of performing agreements or submitting offers between the Controller and its clients.
3. Personal Data - means any information relating to an identified or identifiable natural person, the data subject, within the meaning of Article 4(1) 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 Data Protection Regulation.
5. Service - the broadly understood website available at <https://dcg.pl/>, including related websites, social media profiles, functionalities and applications.
6. User - a natural person using the Service.

§ 2. GENERAL INFORMATION

1. The Controller of Personal Data is DCG Sp. z o.o., with its registered office in Warsaw at ul. Towarowa 28, 00-839 Warsaw, entered in the register of entrepreneurs kept by the District Court for the Capital City of Warsaw, 12th Commercial Division of the National Court Register, KRS number: 0001067305, NIP: 5222877930.
2. In matters related to personal data protection, anyone may contact the Controller by traditional mail sent to the address of the Controller's registered office or by email at: gdp@dcg.pl.

§ 3. SECURITY

1. The Controller makes efforts 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 need-to-know principle;
 - b. periodic testing of IT infrastructure for security;
 - c. cryptographic methods;
 - d. internal checks and audits of collected Personal Data and processing processes;
 - e. storage and processing procedures as well as physical and IT security measures intended to protect against unauthorized access to systems.
2. The Controller does not disclose Personal Data to any recipients who are not authorized to receive them under mandatorily applicable provisions of law or this Privacy Policy.

§ 4. CANDIDATES

1. The Controller processes Personal Data of CANDIDATES for the following purposes and on the following legal bases:
 - a. purposes related to conducting recruitment processes for the Controller's employees, contractors or other potential associates. The legal basis for processing is the data subject's consent, Article 6(1)(a) GDPR, and the necessity to comply with a legal obligation incumbent on the Controller, Article 6(1)(c) GDPR;
 - b. purposes related to conducting recruitment processes by the Controller on behalf of the Controller's clients or potential clients. The legal basis for processing is the data subject's consent, Article 6(1)(a) GDPR;
 - c. purposes related to establishing, pursuing or defending against possible claims that may arise from agreements concluded with the Controller or its Clients. The legal basis for processing is the pursuit of the



Controller's legitimate interest, Article 6(1)(f) GDPR;

- d. purposes related to creating a database intended to support future and potential recruitment processes for clients or potential clients of the Controller. The legal basis for processing is the data subject's consent, Article 6(1)(a) GDPR.
2. The Controller processes the following Personal Data of CANDIDATES:
 - a. data necessary to conduct the recruitment process for the Controller's employees, listed in Article 22¹ of the Labour Code, in particular first name and surname, date of birth, contact details, education, skills and professional experience data, including completed schools and studies, completed training and courses, previous and current employers, positions held and professional duties;
 - b. data collected in the recruitment process for the Controller's employees other than those listed above and provided to the Controller, in particular data contained in letters of intent, CVs, telephone number, email address, etc., provided during negotiations with the Controller, etc.;
 - c. data of a scope analogous to that listed in items a and b, necessary for recruitment of the Controller's associates and for building a database for future recruitments;
 - d. data provided in surveys or forms, for example newsletter or contact forms, placed in the Service for the purposes indicated there other than employment with the Controller, in particular first name and surname, contact details and positions held.
 3. Personal Data of CANDIDATES may be transferred, entrusted or disclosed, in particular to the following recipients or entities:
 - a. entities providing services involving access to electronic recruitment platforms;
 - b. entities providing services in the field of operation, service and management of the IT network and endpoint devices;
 - c. entities providing technical support services for applications in which Personal Data are processed;
 - d. clients of the Controller, potential employers or principals.
 4. IT tools supporting the recruitment process may use elements of automated data processing, however decisions concerning candidates are not made solely by automated means.

§ 5. CONTROLLER'S ASSOCIATES

1. The Controller processes Personal Data of CONTROLLER'S ASSOCIATES for the following purposes and on the following legal bases:
 - a. purposes related to the performance of agreements concluded by such persons with the CONTROLLER. The legal basis for processing is the necessity of Personal Data for the performance of an agreement or to take steps at the request of the data subject prior to entering into an agreement, Article 6(1)(b) GDPR, and the necessity to comply with a legal obligation incumbent on the Controller, Article 6(1)(c) GDPR, including obligations related to social security, accounting, taxes, occupational health and safety, and Employee Capital Plans, PPK;
 - b. disclosure of Personal Data to the Controller's contractors. The legal basis for processing is the pursuit of the Controller's legitimate interest, Article 6(1)(f) GDPR, consisting in the performance of agreements concluded with contractors;
 - c. purposes related to improving and coordinating the Controller's work, including recording correspondence and registers necessary for the Controller's current activities, conducting business, organizing conferences, training, business travel and language learning. The legal basis for processing is the pursuit of the Controller's legitimate interest, Article 6(1)(f) GDPR;
 - d. purposes related to establishing, pursuing or defending against possible claims that may arise from agreements concluded with the Controller or its Clients. The legal basis for processing is the pursuit of the Controller's legitimate interest, Article 6(1)(f) GDPR.
2. The Controller processes the following Personal Data of CONTROLLER'S ASSOCIATES:
 - a. data necessary to perform agreements concluded with the Controller or its clients, listed in particular in Article 22¹ of the Labour Code, including first name and surname, date of birth, contact details, education, skills and professional experience data, completed schools and studies, completed training and courses, previous and current employers, positions held and professional duties;
 - b. data collected in the recruitment process other than those listed above and provided to the Controller, in particular data contained in letters of intent, CVs, telephone number, email address, etc., and data provided during negotiations with the Controller.
3. Personal Data of CONTROLLER'S ASSOCIATES may be transferred, entrusted or disclosed, in particular to the following recipients or entities:
 - a. entities providing services involving access to electronic recruitment platforms;
 - b. entities providing services in the field of operation, service and management of the IT network and endpoint devices;
 - c. entities providing technical support services for applications in which Personal Data are processed;
 - d. clients of the Controller, potential employers or principals.



§ 6. EMPLOYEES OF THE CONTROLLER'S CLIENTS

1. The Controller processes Personal Data of EMPLOYEES OF THE CONTROLLER'S CLIENTS for the following purposes and on the following legal bases:
 - a. purposes related to acquiring business clients or contacting them in order to present an offer. The legal basis for processing is the pursuit of the Controller's legitimate interest, Article 6(1)(f) GDPR;
 - b. purposes related to concluding and performing agreements with the Controller's clients. The legal basis for processing is the pursuit of the Controller's legitimate interest, Article 6(1)(f) GDPR;
 - c. purposes related to establishing, pursuing or defending against possible claims that may arise from agreements concluded with clients. The legal basis for processing is the pursuit of the Controller's legitimate interest, Article 6(1)(f) GDPR.
2. The Controller processes the following Personal Data of EMPLOYEES OF THE CONTROLLER'S CLIENTS:
 - a. data necessary for contact, in particular data provided to the Controller by the Controller's clients or by the data subjects, especially: first name, surname, telephone number, email address, etc.
3. Personal Data of EMPLOYEES OF THE CONTROLLER'S CLIENTS may be transferred, in particular to the following recipients or entities:
 - a. entities providing services in the field of operation, service and management of the IT network and endpoint devices;
 - b. entities providing technical support services for applications in which Personal Data are processed;
 - c. associates and employees of the Controller.

§ 7. OTHER AREAS OF PROCESSING

1. The Controller 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 Service, that is taking actions in connection with a User's request or inquiry, in particular in order to prepare an answer to a question asked or to prepare a dedicated offer. The legal basis for processing is the necessity of the data for concluding an agreement or taking steps aimed at concluding an agreement, Article 6(1)(b) GDPR;
 - b. purposes related to ongoing contact. Processing is carried out on the basis of the Controller's legitimate interest, Article 6(1)(f) GDPR;
 - c. purposes related to managing the Service and analyzing data collected in it, including cookies. Processing is carried out on the basis of consent given or the Controller's legitimate interest, Article 6(1)(a) or (f) GDPR;
 - d. purposes related to direct marketing. Processing is carried out on the basis of a legitimate interest, Article 6(1)(f) GDPR. Communication as part of direct marketing may also take place on the basis of the data subject's consent to receiving commercial information by means of electronic communication, based on Article 398 of the Act of 12 July 2024, Electronic Communications Law;
 - e. purposes related to maintaining social media and online profiles, such as Facebook, Instagram, LinkedIn and Twitter, among others. Processing is carried out on the basis of the Controller's legitimate interest, Article 6(1)(f) GDPR;
 - f. purposes related to operating a newsletter. Processing of Personal Data is carried out on the basis of the Controller's legitimate interest, Article 6(1)(f) GDPR, in accordance with Article 398 of the Act of 12 July 2024, Electronic Communications Law.
2. After the Controller provides appropriate information, Personal Data may also be processed for other purposes, and such processing may be based on:
 - a. consent voluntarily given by the data subjects, Article 6(1)(a) GDPR;
 - b. applicable provisions of law, where processing is necessary for the Controller to comply with a legal obligation, Article 6(1)(c) GDPR;
 - c. necessity for purposes other than those listed above resulting from legitimate interests pursued by the Controller or by a third party, Article 6(1)(f) GDPR.
3. Providing Personal Data is voluntary, however it is a condition for the Controller to provide services or enter into an agreement with the Controller, and may also be required by law.
4. Personal Data of CANDIDATES, CONTROLLER'S ASSOCIATES and EMPLOYEES OF THE CONTROLLER'S CLIENTS will not be transferred to countries outside the EU or to international organizations, except for the case described in item 5 below. No automated decisions, decisions without human involvement, will be made in relation to such Personal Data, and such Personal Data will not be subject to profiling.
5. If a CANDIDATE or CONTROLLER'S ASSOCIATE gives separate consent, personal data may be transferred to entities established in the United Kingdom of Great Britain and Northern Ireland, UK. Data transfer is carried out in accordance with Article 45 and Article 49(1)(a) GDPR, that is on the basis of the European Commission's adequacy decision confirming an adequate level of protection of personal data in the United Kingdom or, if that decision is revoked, on the basis of the voluntary and explicit consent of the person, after informing that person of the possible risks related to such transfer. In each case, data are transferred only to the extent necessary to achieve the purpose for which the consent was given and subject to appropriate security measures.
6. The Controller may use IT tools, including solutions based on artificial intelligence, supporting data processing operations, while observing applicable personal data protection principles.



§ 8. OTHER CASES OF TRANSFERRING PERSONAL DATA

1. In cases other than those described in § 4-6 of this Privacy Policy and to the extent justified by the purpose of processing, the Controller will transfer Personal Data to entities acting on its behalf, that is providers of IT services and solutions, consultants providing services, marketing agencies, entities providing accounting, legal, financial, insurance and administrative services, auditors, entities conducting customer satisfaction surveys at the Controller's request, entities providing customer service at the Controller's request, entities providing message dispatch services, advisers and entities providing the tools referred to in section XI of this Privacy Policy, Cookies, as well as providers of tools using artificial intelligence.
2. If required by law or necessary for pursuing or defending against claims, the Controller may transfer Personal Data to public authorities, including courts, the prosecutor's office or the police, and to professional attorneys. In such a situation, those entities will become separate controllers of Personal Data.
3. Personal Data may be transferred to entities processing them on behalf of the Controller, provided that such entities process Personal Data under an appropriate data processing agreement concluded with the Controller and in accordance with the Controller's instructions.

§ 9. PERIOD OF PERSONAL DATA PROCESSING

1. To the extent that Personal Data are processed by the Controller for the performance of an agreement, the Controller will process them for the duration of that agreement.
2. To the extent that Personal Data are processed for recruitment and for inclusion in a database for future recruitments, they will be processed until consent to their processing is withdrawn. If the candidate does not withdraw consent to the processing of his or her personal data, they will be processed until the purpose for which the personal data were obtained and are processed ceases to exist.
3. To the extent that Personal Data are processed for the pursuit of the Controller's legitimate interests, they will be processed for the period during which the legitimate interest exists, unless the data subject objects earlier to the processing of such data. If the Controller is able to demonstrate compelling legitimate grounds for further processing of such data which override the rights of the person, or grounds necessary to establish, pursue or defend claims, defend the Controller's position in criminal or administrative proceedings or in petty offence cases, and prevent possible abuse or fraud, the Controller will process them despite the objection. This does not apply to an objection to processing for direct marketing purposes, which does not require justification.
4. To the extent that Personal Data are processed on the basis of the data subject's consent, they will be processed until consent is withdrawn.
5. To the extent that Personal Data are processed for the purposes of the Controller's compliance with obligations arising from provisions of law, for example the Accounting Act, the Labour Code, tax regulations or GDPR, they will be processed for the period resulting from such provisions.
6. To the extent that Personal Data are processed for the purposes of establishing or pursuing claims, and for defending against such claims, they will be processed for the limitation period of the claims of the data subject or the Controller.

§ 10. RIGHTS OF 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 the content of his or her Personal Data;
 - b. the right to request rectification of his or her Personal Data if the person believes that the data are incorrect or incomplete;
 - c. the right to request erasure of his or her Personal Data if: (i) the data are no longer necessary for the purposes for which they were collected by the Controller; (ii) the data subject has withdrawn consent to the processing of Personal Data and the Controller has no other legal basis for processing such Personal Data; (iii) the data subject has objected to the processing of Personal Data and there are no overriding legitimate grounds for processing by the Controller despite the objection, or the person has objected to the processing of Personal Data for direct marketing purposes; (iv) the Personal Data were processed unlawfully; (v) the Personal Data should be erased in order to comply with an obligation arising from a legal provision. The right to erasure does not apply to Personal Data processed on the basis of applicable provisions of law or data processed for the purpose of establishing, defending against or pursuing possible claims;
 - d. the right to request restriction of the processing of Personal Data if: (i) the data subject notices that the Personal Data are incorrect. The person may request restriction of the processing of his or her Personal Data for a period allowing the Controller to verify the correctness of the data; (ii) the Personal Data are processed unlawfully, but the data subject does not want them to be erased by the Controller; (iii) the Controller no longer needs the Personal Data, but they 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 Controller's side override the grounds for objection;
 - e. the right to object to the processing of Personal Data if processing is carried out on the basis of the Controller's legitimate interest and the objection is justified by the data subject's particular situation.
2. The data subject also has the right to withdraw consents on the basis of which the Controller processes Personal Data and consents to the use of an email address and telephone number for marketing activities. Withdrawal of consent does not affect the lawfulness of actions carried out before consent was withdrawn.



3. To exercise the above rights, contact the Controller at the email address indicated in this Privacy Policy.
4. The data subject also has the right to lodge a complaint if he or she considers that the processing of Personal Data infringes GDPR. The complaint should be lodged with the supervisory authority, which from 25 May 2018 has been the President of the Personal Data Protection Office.

§ 11. COOKIES

1. Cookies, also known as cookie files or http cookies, are small pieces of text that the Service sends to the browser and that the browser sends back on subsequent visits to the Service.
2. Cookies are stored in the memory of devices and read by the server each time a connection is made to the Service. Cookies help us analyze web traffic and recognize which part of our website has been visited. Our website also uses cookies so that we can treat you individually, thereby adapting our activities to your needs by collecting and remembering information about your preferences. This information is used solely for statistical data analysis and is then removed from our system.
3. Types of Cookies:
 - a. Internal Cookies - files placed on and read from the User's Device by the Service's ICT system;
 - b. External Cookies - files placed on and read from the User's Device by ICT systems of external services;
 - c. Session Cookies - files placed on and read from the User's Device by the Service or external services during a single session of a given Device. After the session ends, the files are deleted from the User's Device;
 - d. Persistent Cookies - files placed on and read from the User's Device by the Service or external services until they are manually deleted. The files are not deleted automatically after the Device session ends, unless the User's Device configuration is set to delete Cookies after the Device session ends.
4. Security:
 - a. Storage and reading mechanisms - Cookie storage and reading mechanisms do not allow any personal data or any confidential information to be retrieved from the User's Device. Transferring viruses, Trojan horses and other worms to the User's Device is practically impossible;
 - b. Internal Cookies - Internal Cookies used by the Controller are safe for Users' Devices;
 - c. External Cookies - the Controller is not responsible for the security of Cookies originating from the Service's partners. The list of partners is included further in the Cookie Policy.
5. Purposes for which Cookies are used:
 - a. Improving and facilitating access to the Service - the Controller may store in Cookies information about the User's preferences and settings concerning the Service in order to improve, enhance and accelerate the provision of services within the Service;
 - b. Marketing and advertising - the Controller and external services use Cookies for marketing purposes and for serving advertisements to Users;
 - c. Statistical data - the Controller and external services use Cookies to collect and process statistical data such as visit statistics, statistics on Users' Devices or user behavior statistics. These data are collected in order to analyze and improve the Service;
 - d. Serving multimedia services - the Controller and external services use Cookies to provide Users with multimedia services;
 - e. Social services - the Controller and external services use Cookies to support social services.
6. A message will be displayed on our website before information in the form of cookies is saved on your computer. We also sometimes use pop-up windows or banners so that you can manage cookies. You can manage cookie settings using your browser, which allows you to disable acceptance of all or some cookies. Your browser may request confirmation of the change of settings. Please remember, however, that enabling a block on all cookies may result in lack of access to some parts of our website. It should also be remembered that external entities may also use cookies to analyze how you use their websites, and we have no influence over this.
7. Each user may delete all stored cookies at any time.
8. Service requirements:
 - a. Restricting the storage of and access to Cookie files on the User's Device may cause some functions of the Service to operate incorrectly;
 - b. The Controller bears no responsibility for incorrectly operating Service functions if the User restricts in any way the possibility of saving and reading Cookie files.
9. Additional information about Cookies can be found at <https://www.aboutcookies.org/> or <https://wszystkoociasteczkach.pl/>.
10. The legal basis for collecting data read from necessary Cookies is Article 6(1)(f) GDPR, which permits the processing of personal data for the pursuit of the data controller's legitimate interest. These include in particular:
 - a. ensuring the correct and safe functioning of the Service for the User and his or her device;
 - b. adapting the Service to the User's individual settings and remembering data entered by the User in connection with using the Service, for example the choice concerning saving Cookies on the user's device or remembering a password;



- c. conducting statistical analyses concerning Users visiting the Service, for example website visit statistics, which will serve to improve the effectiveness of marketing activities carried out by the Controller and to build a business strategy;
 - d. advertising and promotion, and distribution of informational and advertising materials via the Service.
11. When using the Service, the User remains anonymous until he or she decides otherwise. Information contained in system logs, for example an IP address, is used by the Controller for technical purposes related to server administration. In addition, IP addresses are used to collect general statistical demographic information, such as the region from which Users connect.
 12. The Service uses the following Cookies and the following tools:
 - a. AddThis;
 - b. Google Analytics;
 - c. Facebook.
 13. The User may at any time opt out of the collection of Cookies by changing the settings in the web browser used to connect to the Service. In such a case, using all functions of the website may be difficult or impossible. Additional information can be found at 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. SOCIAL MEDIA POLICY

1. By using our social media accounts, you interact with us, for example by subscribing to a fanpage, leaving a reaction, likes or comments, or sending us a message. Information you provide about yourself may constitute personal data. This Privacy Policy, hereinafter the Policy, describes how we process personal data collected through accounts on the following social networking portals, hereinafter Social Media Portals:

- a. FACEBOOK: <https://www.facebook.com/DCGcareer>
- b. INSTAGRAM: https://www.instagram.com/dcg_career/
- c. LINKEDIN: <https://www.linkedin.com/company/dcgcareer/posts/?feedView=all>
- d. TIKTOK:

2. Categories of persons whose data are processed and the scope of processed data
 - a. FACEBOOK

We process data of persons who:

- subscribed to the account by clicking the "Like" or "Follow" icon;
- posted their comment, shared it or clicked the "Like" icon under any of the posts published on the account;
- expressed a wish to become a member of a group created by us.

We process the following types of personal data:

- account identifier, usually containing a first name and surname or nickname;
- profile photo;
- other photos, which may also show an image;
- content of your comments and posts;
- statistical data concerning persons visiting the fanpage, available through the "Facebook Insights" function and collected through cookies.

- b. INSTAGRAM

We process data of persons who:

- subscribed to the account by clicking the "Follow" icon;
- posted their comment under any of the posts published on the account or reacted to published photos.

We process the following types of personal data:

- account identifier, usually containing a first name and surname or nickname;
- profile photo;
- other photos, which may also show an image;
- content of your comments;
- statistical data concerning persons visiting the account, collected through cookies.

- c. LINKEDIN

We process data of persons who:

- visited the Controller's page;
- interacted with the Controller;
- published or transmitted data through services offered by LinkedIn, for example by filling in forms or answering surveys.



We process the following types of personal data:

- first name, surname, image and other identifying data made publicly available by you on the profile created on LinkedIn, including address data, contact details such as email address and telephone number, and data on education, length of service, professional qualifications and previous employment history;
- statistical data concerning persons visiting the account, collected through cookies.

d. TIKTOK

We process data of persons who:

- subscribed to our account by clicking the "Follow" button;
- posted a comment under any of our videos or reacted to them, likes, shares, tags;
- sent us a private message, Direct Message, or otherwise interacted with our account.

We process the following types of personal data:

- account identifier, usually containing a first name and surname or nickname;
- profile photo;
- content of your comments, messages, videos or reactions;
- other photos or recordings that may show your image;
- statistical data concerning persons visiting the account, collected through cookies and analytical functions provided by the TikTok service operator, for example TikTok Analytics.

3. Purposes and legal bases of processing

We process your personal data:

- on the basis of a legitimate interest, Article 6(1)(f) GDPR, consisting in:
 - maintaining an account and groups on the Social Media Portal, under the terms and rules specified by the Portal operator, informing through it about our activity, promoting events and the brand, products and services, building and maintaining a community with us, including supervising content published by users, and communicating through the available functionalities of the Social Media Portal, comments and messages;
 - keeping statistics, through analysis of data concerning the activity of users of our account;
 - possible establishment, pursuit or defense against claims;
- on the basis of separately granted consent, within the scope and for the purpose specified in the content of the consent and until its withdrawal, Article 6(1)(a) or Article 9(2)(a) GDPR;
- on the basis of statutory requirements in order to comply with our legal obligations arising from provisions of law, Article 6(1)(c) GDPR.

4. Joint controllership of personal data

In the scope of processing personal data for statistics, we act as joint controllers within the meaning of Article 26(1) GDPR together with the operator of the Social Media Portal that provides the statistics option. We undertake such activities as part of our legitimate interest, Article 6(1)(f) GDPR, described above. More information about processing data for statistics can be found at:

- For the Facebook and Instagram Social Media Portals, the joint controller is Meta Platforms Ireland Limited: https://www.facebook.com/legal/terms/information_about_page_insights_data;
- For the LinkedIn Social Media Portal, the joint controller is LinkedIn Ireland Unlimited Company: <https://legal.linkedin.com/pages-joint-controller-addendum>;
- For the TikTok Social Media Portal, the joint controller is TikTok Technology Limited, with its registered office in Ireland, 10 Earlsfort Terrace, Dublin, D02 T380, acting jointly with TikTok Information Technologies UK Limited. More information about the principles of joint controllership and data processing can be found in the TikTok Privacy Policy: <https://www.tiktok.com/legal/privacy-policy-eea?lang=pl>.

5. Data recipients

Access to your personal data will be available to:

- our authorized personnel and entities providing services to us, including marketing services, IT services and technical support, which must have access to data in order to perform their duties;
- other users of the Social Media Portal and group members, due to the fact that information about persons following the account, likes, as well as the content of comments, posts and other information provided by users is public;
- public authorities and entities performing public tasks or acting on behalf of public authorities, to the extent and for the purposes resulting from generally applicable provisions of law;
- the administrator of the Social Media Portal according to the rules described in the privacy policies provided by it.

Please remember that operators of Social Media Portals are separate entities responsible for processing data of persons using Social Media Portals, including data concerning you. These entities process your personal data for their own purposes on the basis of legal grounds determined by them. In particular, based on their own rules for the operation of the Social Media Portal, they may collect and process information contained in cookies of persons visiting our account. We have limited influence over data processing by operators of Social Media Portals. For this reason, please read their operating rules and privacy policies made available in them, which can be found here:



- a. Facebook: <https://www.facebook.com/about/privacy>;
- b. Instagram: <https://help.instagram.com/519522125107875>;
- c. LinkedIn: https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy;
- d. TikTok: <https://www.tiktok.com/legal/page/eea/privacy-policy/pl>.

6. Transfer of data to third countries or international organizations

We do not transfer your personal data outside the European Economic Area. However, due to the fact that the owners of social media portals have their main registered offices in the United States, your personal data may be transferred by them outside the territory of the European Union. We ensure that in such a case the transfer of data takes place on the basis of the European Commission decision of 10 July 2023 confirming an adequate level of protection for personal data provided by the so-called EU-U.S. Data Privacy Framework. With regard to TikTok, the operator of TikTok, ByteDance, has its main registered office in China and has subsidiaries registered in the Cayman Islands. Your personal data may be transferred by it outside the territory of the European Union. It should be remembered that China and the Cayman Islands are not recognized by the European Commission as countries ensuring an adequate level of personal data protection in accordance with EU law. Therefore, transfer of data to China or the Cayman Islands may involve the risk of a lower level of protection for your personal data than that applicable in the European Union. TikTok applies technical and organizational measures intended to protect personal data, however due to a different legal system, it is not possible to guarantee a level of protection equivalent to that applicable in the EU.

7. Data retention period

The data processing period is related to the purposes and legal bases of their processing. Accordingly:

- a. data processed on the basis of consent will be processed until consent is withdrawn;
- b. data processed on the basis of statutory requirements will be processed for the period during which legal provisions require the data to be retained;
- c. data processed on the basis of the Controller's legitimate interest will be processed until an effective objection is lodged or until that interest ceases to exist, that is:
 - as standard, we process your data until we stop maintaining the account on the Social Media Portal or for the duration of the group's existence;
 - personal data obtained in correspondence conducted by us are stored for the period of handling the message sent to us;
 - data processed for the purpose of establishing, pursuing or defending against claims are processed for a period equal to the limitation period of such claims.

8. You have the following rights:

- a. the right to request access to your personal data, rectification, erasure or restriction of processing, as well as the right to data portability;
- b. the right to object at any time to the processing of your data for direct marketing purposes;
- c. the right to object to data processing in connection with your particular situation;
- d. where your data are processed on the basis of consent, the right to withdraw consent at any time without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.

To exercise your rights, please contact us using the contact details indicated in the introduction.

You also have the right to lodge a complaint with the supervisory authority, the President of the Personal Data Protection Office, ul. Moniuszki 1A, 00-014 Warsaw.

9. Information on the source of data and other information

- a. We receive your personal data directly from you through your interaction with our account on the Social Media Portal and from your public profile;
- b. Providing data is voluntary;
- c. Personal data will not be subject to automated decision-making, including profiling.

§ 13. CONTACT WITH THE CONTROLLER

The data subject may contact the Controller in any matter concerning Personal Data in the following way:

1. by sending a message to the email address: gdpr@dcg.pl;
2. by traditional correspondence to the address: DCG Sp. z o.o., with its registered office in Warsaw at ul. Towarowa 28, 00-839 Warsaw.