



# PRIVACY POLICY

**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 website <https://d cg.pl/> (the "Service").

## § 1. DEFINITIONS

The following terms and expressions used in this Privacy Policy shall have the meanings set out below:

1. **Controller** – the controller of Personal Data, i.e. the entity which, alone or jointly with others, determines the purposes and means of the processing of personal data (as referred to in Article 4(7) GDPR).
2. **Processing** – any operation or set of operations performed on personal data or on sets of personal data (as referred to in Article 4(2) GDPR), which, within the Controller's activities, concern three principal categories of natural persons:
  - **CANDIDATES**, i.e. persons not in permanent cooperation with the Controller, whose data are processed for ongoing, future or potential recruitment projects;
  - **CONTROLLER'S ASSOCIATES**, i.e. persons whose data are processed by the Controller in connection with ongoing cooperation with the Controller on the basis of various legal relationships, in particular the Controller's employees and contractors;
  - **CLIENTS' EMPLOYEES**, i.e. persons employed by the Controller's clients (contracting parties) or potential clients, regardless of the legal basis of employment, including client representatives whose data are processed in connection with their disclosure to the Controller for the purposes of performance of contracts or submission of offers between the Controller and its clients.
3. **Personal Data** – any information relating to an identified or identifiable natural person ("data subject") within the meaning of Article 4(1) GDPR; an identifiable natural person is one 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 online service available at <https://d cg.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 maintained by the District Court for the Capital City of Warsaw, 12th Commercial Division of the National Court Register, KRS No.: 0001067305, NIP: 5222877930.
2. For matters related to the protection of personal data, any person may contact the Controller by



traditional post at the Controller's registered office address or by email at: [gdpr@dcg.pl](mailto:gdpr@dcg.pl).

### **§ 3. SECURITY**

1. The Controller makes efforts to protect Personal Data against unauthorised access by third parties and, to this end, applies organisational and technical security measures, in particular:

- a) internal restrictions on access to Personal Data in accordance with the principle of necessary availability;
- b) periodic testing of IT infrastructure for security;
- c) cryptographic methods;
- d) internal controls and audits of the Personal Data collected and the processing operations;
- e) storage and processing procedures and physical and IT security measures intended to protect against unauthorised access to systems.

2. The Controller does not disclose Personal Data to any recipients not authorised to receive them under the applicable laws or this Privacy Policy.

### **§ 4. CANDIDATES**

1. The Controller processes CANDIDATES' Personal Data for the following purposes and on the following legal bases:

- a) purposes related to conducting, for the Controller's needs, recruitment processes for employees, contractors or other potential associates – the legal basis is the data subject's consent (Article 6(1)(a) GDPR) and the necessity to comply with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR);
- b) purposes related to conducting recruitment processes by the Controller on behalf of clients or potential clients of the Controller – the legal basis is the data subject's consent (Article 6(1)(a) GDPR);
- c) purposes related to the establishment, exercise or defence of potential claims arising from agreements concluded with the Controller or its Clients – the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR);
- d) purposes related to creating a database to carry out future and potential recruitment processes on behalf of the Controller's clients or potential clients – the legal basis is the data subject's consent (Article 6(1)(a) GDPR).

2. The Controller processes the following CANDIDATES' Personal Data:

- a) data necessary to conduct the Controller's employee recruitment process as specified in Article 221 of the Polish Labour Code, in particular first and last name, date of birth, contact details, data on education, skills, professional experience (completed schools and studies, trainings and courses attended, previous and current employers, positions held and professional duties);
- b) data collected in the Controller's employee recruitment process other than those indicated above and provided to the Controller, in particular those contained in cover letters and CVs (telephone number, email address, etc.), provided during negotiations with the Controller, etc.;
- c) data to an analogous extent as those indicated in points (a) and (b), necessary for the recruitment of

the Controller's associates and for building a database for future recruitment;

- d) data provided in surveys or forms (e.g., newsletter, contact form) placed on the Service for the purposes indicated therein other than employment with the Controller, in particular first and last name, contact details, positions held.

3. CANDIDATES' Personal Data may be transferred (entrusted or disclosed) in particular to the following recipients (entities):

- a) providers of electronic recruitment platforms;
- b) providers of services for maintenance, servicing and management of the IT network and end devices;
- c) providers of technical support for applications in which Personal Data are processed;
- d) the Controller's clients (potential employers or principals).

## **§ 5. CONTROLLER'S ASSOCIATES**

1. The Controller processes CONTROLLER'S ASSOCIATES' Personal Data for the following purposes and on the following legal bases:

- a) purposes related to the performance of agreements concluded by these persons with the CONTROLLER – the legal basis is the necessity of the Personal Data to perform a contract or to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR) and the necessity to comply with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR), including obligations related to social security, accounting, taxes, health and safety, employee capital plans (PPK);
- b) disclosure of Personal Data to the Controller's counterparties – the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR) consisting in the performance of contracts concluded with counterparties;
- c) purposes related to streamlining and coordinating the Controller's work, including recording correspondence and registers necessary for the Controller's day-to-day operations, conducting business, organising conferences, trainings, business trips, language learning – the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR);
- d) purposes related to the establishment, exercise or defence of potential claims arising from agreements concluded with the Controller or its Clients – the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR).

2. The Controller processes the following CONTROLLER'S ASSOCIATES' Personal Data:

- a) data necessary for the performance of agreements concluded with the Controller or its clients, in particular those specified in Article 221 of the Polish Labour Code, including first and last name, date of birth, contact details, data on education, skills, professional experience (completed schools and studies, trainings and courses attended, previous and current employers, positions held and professional duties);
- b) data collected in the recruitment process other than those indicated above and provided to the Controller, in particular those contained in cover letters and CVs (telephone number, email address, etc.), provided during negotiations with the Controller.

3. CONTROLLER'S ASSOCIATES' Personal Data may be transferred (entrusted or disclosed) in particular to the following recipients (entities):

- providers of electronic recruitment platforms;
- providers of services for maintenance, servicing and management of the IT network and end devices;
- providers of technical support for applications in which Personal Data are processed;
- the Controller's clients (potential employers or principals).

## **§ 6. CLIENTS' EMPLOYEES**

1. The Controller processes CLIENTS' EMPLOYEES' Personal Data for the following purposes and on the following legal bases:

- a) purposes related to acquiring business clients or contacting them to present an offer – the legal basis is 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 is the Controller's legitimate interest (Article 6(1)(f) GDPR);
- c) purposes related to the establishment, exercise or defence of potential claims arising from agreements concluded with clients – the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR).

2. The Controller processes the following CLIENTS' EMPLOYEES' Personal Data:

- a) data necessary for contact, in particular provided to the Controller by the Controller's clients or by the data subjects, in particular: first name, last name, telephone number, email address, etc.

3. CLIENTS' EMPLOYEES' Personal Data may be transferred in particular to the following recipients (entities):

- a) providers of services for maintenance, servicing and management of the IT network and end devices;
- b) providers of technical support for applications in which Personal Data are processed;
- c) the Controller's associates and employees.

## **§ 7. OTHER PROCESSING AREAS**

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, i.e. taking actions in response to a User's request or inquiry, in particular to prepare a response to a question asked or to prepare a dedicated offer – the legal basis is the necessity of data for the conclusion of a contract or to take steps aimed at concluding a contract (Article 6(1)(b) GDPR);
- b) purposes related to ongoing contact – processing takes place on the basis of the Controller's legitimate interest (Article 6(1)(f) GDPR);
- c) purposes related to managing the Service and analysing data collected therein (including cookies) – processing takes place 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 takes place on the basis of a legitimate interest (Article 6(1)(f) GDPR). Communication within direct marketing may also take place on the basis of the data subject's consent to receive commercial information by means of electronic communication under Article 398 of the Polish Act of 12 July 2024 – Electronic Communications Law;

- e) purposes related to maintaining profiles on social and online media, such as Facebook, Instagram, LinkedIn, Twitter – processing takes place on the basis of the Controller's legitimate interest (Article 6(1)(f) GDPR);
- f) purposes related to running a newsletter – Personal Data are processed on the basis of the Controller's legitimate interest (Article 6(1)(f) GDPR) in accordance with Article 398 of the Polish Act of 12 July 2024 – Electronic Communications Law.

2. After appropriate notice by the Controller, Personal Data may also be processed for other purposes, which may be based on:

- a) consents voluntarily given by the data subjects (Article 6(1)(a) GDPR);
- b) applicable legal provisions – where processing is necessary for compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR);
- c) necessity for purposes other than those listed above arising from the legitimate interests pursued by the Controller or by a third party (Article 6(1)(f) GDPR).

3. The provision of Personal Data is voluntary; however, it is a condition for the Controller's provision of services or conclusion of a contract with the Controller and may also be required by law.

4. CANDIDATES', CONTROLLER'S ASSOCIATES' and CLIENTS' EMPLOYEES' Personal Data will not be transferred to countries outside the EU or to international organisations – except in the case described in point 5 below. No automated decision-making (decisions without human involvement) will be undertaken with respect to such Personal Data, nor will they be subject to profiling.

5. Where a separate consent is given by a CANDIDATE or a CONTROLLER'S ASSOCIATE, personal data may be transferred to entities established in the United Kingdom of Great Britain and Northern Ireland

(UK). Data transfers are carried out in accordance with Article 45 and Article 49(1)(a) GDPR, i.e., based on the European Commission's adequacy decision for the United Kingdom or – if that decision is revoked – based on the data subject's freely given, explicit consent, after being informed of the possible risks associated with such transfer. In each case, the transfer will be made only to the extent necessary to achieve the purpose for which consent was granted, and with appropriate security measures in place.

## **§ 8. OTHER CASES OF DISCLOSING 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 disclose Personal Data to entities acting on its behalf, i.e., providers of IT services and solutions, consultants providing services, marketing agencies, providers of accounting, legal, financial, insurance and administrative services, auditors, entities conducting customer satisfaction surveys on behalf of the Controller, entities providing customer service on behalf of the Controller, entities providing messaging services, advisors, and entities providing the tools referred to in Section XI of this Privacy Policy (Cookies).

2. If required by law or necessary to establish or defend claims, the Controller may disclose Personal Data to public authorities, including courts, the public prosecutor's office or the police, as well as to professional attorneys (these entities will then become separate controllers of Personal Data).

3. Personal Data may be disclosed to entities processing them on behalf of the Controller; such entities process Personal Data on the basis of an appropriate personal 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 a contract, the Controller will process them for the term of that contract.
2. To the extent that Personal Data are processed for recruitment purposes and for inclusion in the database for future recruitment, they will be processed until consent to their processing is withdrawn. If the candidate does not withdraw consent – until the purpose for which the personal data were collected and are processed ceases.
3. To the extent that Personal Data are processed for the Controller's legitimate interests, they will be processed for the duration of those legitimate interests, unless the data subject objects to such processing earlier. If the Controller is able to demonstrate the existence of compelling legitimate grounds for further processing which override the rights of the data subject, or which are necessary for the establishment, exercise or defence of claims, the defence of the Controller's position in criminal, administrative or misdemeanour proceedings, as well as the prevention of potential abuses or fraud, the Controller will continue processing despite the objection (this does not apply to objections to processing for direct marketing, 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 such consent is withdrawn.
5. To the extent that Personal Data are processed for the purpose of the Controller's compliance with legal obligations (e.g., under the Accounting Act, Labour Code, tax regulations or GDPR), they will be processed for the period resulting from such regulations.
6. To the extent that Personal Data are processed for the purpose of establishing or pursuing claims and for defending against such claims, they will be processed for the limitation period for claims of the data subject or claims of 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 their Personal Data;
  - b. the right to request rectification of their Personal Data if they believe the data are incorrect or incomplete;
  - c. the right to request erasure of their Personal Data where: (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 to process those Personal Data; (iii) the data subject has objected to the processing of Personal Data and the Controller has no overriding legitimate grounds for processing despite the objection, or the data subject has objected to processing for direct marketing; (iv) the Personal Data have been processed unlawfully; (v) the Personal Data must be erased in order to comply with a legal obligation. The right to erasure does not apply to Personal Data processed on the basis of applicable legal provisions or data processed for the establishment, defence or exercise of potential claims;
  - d. the right to request restriction of processing of Personal Data where: (i) the data subject notices that the Personal Data are incorrect – restriction of processing may be requested for the period necessary for the Controller to verify the correctness of such data; (ii) the Personal

Data are processed unlawfully, but the data subject does not wish them to be erased by the Controller; (iii) the Personal Data are no longer needed by the Controller but may be needed by the data subject to establish, exercise or defend claims; (iv) the data subject has objected to processing – pending verification as to whether the Controller's legitimate grounds override the grounds for the objection;

- e. the right to object to the processing of Personal Data where processing is based on 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 the email address and telephone number for marketing activities; withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

3. To exercise the above rights, please 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 they consider that the processing of Personal Data violates GDPR. The complaint should be lodged with the supervisory authority, which since 25 May 2018 has been the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych).

## § 11. COOKIES

1. Cookies (also 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 device memory and read by the server each time a connection to the Service is made. Cookies help us analyse web traffic and recognise which part of our website has been visited. Our website also uses cookies in order to treat you individually, thereby customising our actions to your needs by collecting and remembering information about your preferences. This information is used solely for the purpose of statistical data analysis and is then deleted from our system.

### 3. Types of Cookies:

- a) Internal cookies – files placed and read from the User's device by the Service's ICT system;
- b) External cookies – files placed and read from the User's device by the ICT systems of external services;
- c) Session cookies – files placed 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 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 is configured to delete cookies upon session end.

### 4. Security:

- a) Storage and read-out mechanisms – the mechanisms for storing and reading Cookies do not allow any personal data or confidential information to be retrieved from the User's device. The transfer of viruses, trojans and other worms to the User's device is practically impossible;
- b) Internal cookies – the 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 provided later in the Cookie Policy.

**5. Purposes for which Cookies are used:**

- a) Streamlining and facilitating access to the Service – the Controller may store information in Cookies about the User's preferences and settings regarding the Service in order to streamline, improve and speed up the provision of services under the Service;
- b) Marketing and advertising – the Controller and external services use Cookies for marketing purposes and to serve advertisements to Users;
- c) Statistical data – the Controller and external services use Cookies to collect and process statistical data such as visit statistics, User device statistics or user behaviour statistics. This data is collected to analyse and improve the Service;
- d) Serving multimedia services – the Controller and external services use Cookies to serve multimedia services to Users;
- e) Social services – the Controller and external services use Cookies to support social services.

**6.** A message is displayed on our website before information in the form of cookies is stored on your computer. We sometimes also use pop-ups or banners so that you can manage cookies. You can manage cookie settings via your browser (allowing you to disable the acceptance of all or some cookies). Your browser may require confirmation of the change in settings. Please note that enabling the blocking of all cookies may result in the unavailability of some parts of our website. It should be noted that third parties may also use cookies to analyse how you use their websites, over which we have no control.

**7.** Each user may delete all stored cookies at any time.

**8. Service requirements:**

- a) Restricting the storage of and access to Cookies on the User's device may cause certain functions of the Service to malfunction;
- b) The Controller assumes no responsibility for the malfunctioning of the Service's functions if the User in any way restricts the possibility of storing and reading Cookies.

**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 allows the processing of personal data for the purposes of the controller's legitimate interests. These include, in particular:

- a) ensuring that the Service functions properly and safely for the User and their device;
- b) adapting the Service to the User's individual settings and remembering data entered by the User related to the use of the Service, e.g., the choice regarding the storage of Cookies on the user's device or remembering the password;
- c) conducting statistical analyses concerning Users visiting the Service, e.g., visit statistics, which will serve to improve the effectiveness of the Controller's marketing activities and to build a business strategy;
- d) advertising and promotion, distribution of informational and advertising materials via the Service.

**11.** By using the Service, the User remains anonymous until they decide otherwise. Information contained

in system logs (e.g., 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 tools:

- a) AddThis
- b) Google Analytics
- c) Facebook

**13.** The User may opt out of the collection of Cookies at any time by changing the settings in the Internet browser used to connect to the Service. In such a case, use of all website functions 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. When using our social media accounts, you interact with us, e.g., by subscribing to our page, leaving your reaction (likes, comments) or sending us a message. The information you provide about yourself may constitute personal data. This Privacy Policy (the “Policy”) describes how we process personal data collected via accounts on the following social media platforms (the “Social Media Platforms”):

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

2. Categories of data subjects and 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 “Like” under any of the posts published on the account;
- expressed their wish to become a member of a group created by

us. We process the following types of personal data:

- account identifier (usually containing first and last name or a nickname);
- profile picture;
- other photos (which may also depict the image);
- the content of your comments and posts;

- statistical data on visitors to the fanpage available via the “Facebook Insights” function, collected through cookies.

#### **b) INSTAGRAM**

We process data of persons who:

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

We process the following types of personal data:

- account identifier (usually containing first and last name or a nickname);
- profile picture;
- other photos (which may also depict the image);
- the content of your comments;
- statistical data on visitors to the account, collected through cookies.

#### **c) LINKEDIN**

We process data of persons who:

- visited the Controller’s page;
- interacted with the Controller;
- posted or submitted data via services offered by LinkedIn (e.g., completed forms, responded to surveys).

We process the following types of personal data:

- first name, last name, image and other identification data made publicly available by you on your profile created on LinkedIn (including address data, contact data such as email address and telephone number, and data on education, work experience, professional authorisations and employment history);
- statistical data on visitors to 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 first and last name or a nickname);
- profile picture;
- the content of your comments, messages, videos or reactions;
- other photos or recordings that may depict your image;
- statistical data on visitors to the account, collected through cookies and analytics functions provided by

the platform operator (e.g., TikTok Analytics).

### 3. Purposes and legal bases of

processing We process your personal

data:

- a) on the basis of a legitimate interest (Article 6(1)(f) GDPR) consisting in: (i) operating the account and groups on the Social Media Platform under the terms and conditions set by the platform operator and 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 via the functionalities available on the Social Media Platform (comments, messages);  
(ii) compiling statistics (by analysing data on user activity on our account); (iii) possibly establishing, exercising or defending legal claims;
- b) on the basis of a separate consent to the extent and for the purpose specified in the content of the consent and for the time until it is withdrawn (Article 6(1)(a) or Article 9(2)(a) GDPR);
- c) on the basis of statutory requirements in order to fulfil our legal obligations arising from legal provisions (Article 6(1)(c) GDPR).

### 4. Joint controllership

For the processing of personal data for statistical purposes, we act as joint controllers within the meaning of Article 26(1) GDPR together with the operator of the Social Media Platform that provides the statistics option. We undertake such actions under our legitimate interest (Article 6(1)(f) GDPR) described above. More information on the processing of data for statistical purposes can be found at:

- 1 For Facebook and Instagram, the joint controller is Meta Platforms Ireland Limited:  
[https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)
- 2 For LinkedIn, the joint controller is LinkedIn Ireland Unlimited  
Company: <https://legal.linkedin.com/pages-joint-controller-addendum>.
- 3 For TikTok, the joint controller is TikTok Technology Limited, based in Ireland (10 Earlsfort Terrace, Dublin, D02 T380), acting jointly with TikTok Information Technologies UK Limited. More information on the principles of joint controllership and data processing can be found in TikTok's Privacy Policy: <https://www.tiktok.com/legal/privacy-policy-eea?lang=pl>.

### 5. Data recipients

Access to your personal data will be granted to:

- a) our authorised staff and entities providing services to us (including marketing services, IT and technical support) that must have access to the data to perform their duties;
- b) other users of the Social Media Platform and members of the group (as information on followers, likes, as well as the content of comments, posts and other information provided by users is public);
- c) public authorities and entities performing public tasks or acting on behalf of public authorities, to the extent and for the purposes arising from generally applicable law;
- d) the administrator of the Social Media Platform under the principles described in the privacy policies made available by them.

Please remember that the operators of the Social Media Platforms are separate entities responsible for processing personal data of persons using those platforms, including data concerning you. These entities process your personal data for their own purposes on the legal bases established by them. In particular, they may, on the basis of their own rules for the functioning of the Social Media Platform, collect and process information contained in cookies of persons visiting our account. We have limited influence on the processing of data by Social Media Platform operators. For this reason, please read their terms and the privacy policies they provide, which you can find 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](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. Transfers to third countries or international organisations**

We do not transfer your personal data outside the European Economic Area. However, due to the fact that the owners of the social media platforms have their headquarters in the United States, your personal data may be transferred by them outside the European Union. We ensure that, in such a case, the transfer takes place on the basis of the European Commission's decision of 10 July 2023, recognising an adequate level of personal data protection ensured by the so-called "EU-US Data Privacy Framework". With regard to TikTok – the operator of TikTok, ByteDance, has its headquarters in China and has subsidiaries registered in the Cayman Islands. Your personal data may be transferred by it outside the European Union. Please note that China and the Cayman Islands are not recognised by the European Commission as providing an adequate level of personal data protection under EU law. Therefore, the transfer of data to China/the Cayman Islands may involve the risk of a lower level of protection of your personal data than in the European Union. TikTok applies technical and organisational measures to protect personal data; however, due to the different legal system, an equivalent level of protection as in the EU cannot be guaranteed.

## **7. Data retention period**

- a) data processed on the basis of consent will be processed until the consent is withdrawn;
- b) data processed on the basis of statutory requirements will be processed for the time during which the law requires the data to be stored;
- c) data processed on the basis of the Controller's legitimate interest will be processed until a valid objection is lodged or until that interest ceases, i.e.:
  - as a rule, we process your data until we cease operating the account on the Social Media Platform or for the duration of the group;
  - personal data obtained in correspondence are stored for the time necessary to handle the message sent to us;
  - data processed for the purpose of establishing, exercising or defending claims are processed for a period equal to the limitation period for such claims.

## **8. Your rights include:**

- a) the right to request access to your personal data, their 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 processing due to your particular situation;
- d) where processing is based on 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 at the beginning. 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. 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 Platform 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**

A data subject may contact the Controller on any matter relating to Personal Data in the following ways:

- 1 by sending an email to: [gdpr@dco.pl](mailto:gdpr@dco.pl);
- 2 by traditional mail to: DCO Sp. z o.o., ul. Towarowa 28, 00-839 Warsaw, Poland.