

www.vershold.com

Vershold Holding Poland Sp. z o.o.

Privacy Policy (in force from 26.02.2020)

We know you want to protect your personal data. We will also try to maintain the utmost care while processing your personal data. In order to protect your privacy to the maximum possible extent, we have prepared this Privacy Policy. Read our Privacy Policy which explains our rules for collecting, processing and using personal data.

Personal Data is not used for purposes other than those resulting from the Privacy Policy, unless we have obtained your consent or it is required or permitted by law. We attach particular importance to protecting the privacy of Users visiting our website, but if you do not agree to any form of processing your Personal Data described in the Privacy Policy, do not use our Website (www.vershold.com).

The Privacy Policy is for information purposes only and is not a source of any obligations for Users of our Website.

The Website has been created by **Vershold Holding Poland Sp. z o. o.**, with the registered office in Warsaw, at: ul. Żwirki i Wigury 16A, 02-092 Warsaw, entered to the register of entrepreneurs held by the District Court for the Capital City of Warsaw, 13th Commercial Division of the National Court Register under no. KRS 0000453736, Statistical Reference Number (REGON): 14656934000000, Tax Identification Number (NIP): 5223004687.

I. General provisions

Personal Data Administrator

I.1. The Administrator of the personal data collected and processed through the Website or other communication channels established with the User is **Vershold Holding Poland Sp. z o.o.**, with the registered office in Warsaw, at: ul. Żwirki i Wigury 16A, 02-092 Warsaw, entered to the register of entrepreneurs held by the District Court for the Capital City of Warsaw, 13th Commercial Division of the National Court Register under no. KRS 0000453736, Statistical Reference Number (REGON): 14656934000000, Tax Identification Number (NIP): 5223004687, hereinafter referred to as "**Vershold**".

CONTACT WITH THE PERSONAL DATA ADMINISTRATOR

The User may at any time directly contact Vershold via:

- a) electronic mail: warsaw.vershold@vershold.com;
- b) a written letter sent by post to the address: Vershold Holding Poland Sp. z o.o., address: ul. Żwirki i Wigury 16A, 02-092 Warsaw;
- c) by telephone at +48 22 376 27 91 (connection fee as per the relevant operator's price list).

In the event that the User contacts Vershold via one of the above-mentioned ways, Vershold may ask the User to provide additional, further, information and Personal Data in order to answer. Providing information and Personal Data is voluntary, however, it may be necessary to perform actions or obtain information that interests the User.

I.2. Vershold shall process the User's personal data in accordance with the Personal Data Protection Act of 10th May 2018 (Journal of Laws (Dz. U.) of 2018, item 1000) and the 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 (Official Journal of the EU, No. 119, page 1, hereinafter referred to also as "the GPRD), and taking into consideration the provisions of the Act of 18th July 2002 on providing online services (Journal of Laws (Dz. U.) of 2017, item 1219; consolidated text of 24th June 2017, as amended).

I.3. The term "Personal Data" used in this Privacy Policy shall be defined as information about an identified or identifiable natural person. An identifiable physical person shall be understood as a person which may be directly or indirectly identified, especially on the basis of identifying data, such as name and surname, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of such a natural person.

II. Scope of Personal Data protection and processing

II.1. Vershold protects the personal data of the Users, Webstore visitors and persons sharing their personal data using other communication channels.

II.2. Vershold may process the following Users' Personal Data provided in the 'Career' and 'Contact' tab: name and surname, e-mail address, contact telephone number and Personal Data in the 'Career' tab provided by the User via the 'Your CV' field. In addition, Personal Data may be collected in connection with the use of Cookies, including: IP address, operating system, browser type, browser version, browser configuration, name of the Internet provider and other information about the type of computer and Internet connection used to identify the type of device , establishing a connection with the Website, enabling data exchange, URL and IP address of the website from which the User entered or was redirected to the Website with the date and time, full history of clicks in the form of URLs together with the date and time, visited subpages on Website, launched links with date and time, service inquiries, search phrases, services.

II.3. Vershold processes Personal Data provided by job candidates (e.g. in a CV) only to the extent specified in labor law, and in the case of recruitment for positions offered under a civil law contract - only to the extent necessary to conclude and perform such a contract. Providing data to a wider extent is voluntary and requires the User's consent. If in the application sent or during the recruitment process the candidate also discloses other data not required by Vershold, the User should agree to their processing, and such consent may be withdrawn at any time, without affecting the lawfulness of the processing carried out before its withdrawal. If the submitted applications contain information inadequate to the purpose of recruitment, they will not be used in the recruitment process and will be deleted.

II.4. The full content of the information clause regarding the processing of personal data of applicants for employment is placed in the [Career](#) tab.

II.5. Vershold ensures that the Users' Personal Data collected by it are:

- a) processed in accordance with the law, fairly and transparently for the data subject;
- b) collected for specific, explicit and legitimate purposes and not further processed in a way incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- d) correct and updated as necessary;

- e) stored in a form that allows identification of the data subject for no longer than is necessary for the purposes for which the data are processed;
- f) processed in a way that ensures adequate security of Personal Data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by appropriate technical or organizational measures.

III. The purposes and legal basis for processing Personal Data

III.1. Bearing in mind the applicable provisions, and above all the security of Users' Personal Data in each case of Vershold's processing of Personal Data, the purpose and scope of data processing result from the User's consent or legal provisions and are clarified as a result of the User's actions on the Website or other channels communication with the User.

III.2. Personal Data is processed in the manner described in this Privacy Policy. Personal Data is not used for other purposes, unless the User has given his consent or it is required or permitted by law. The administrator processes Personal Data based on the following grounds:

- a) User's consent (pursuant to art.6 par.1 lit. a) GDPR) - in the scope of data made available in the "Contact" tab, unless the content of the inquiry indicates a different legal basis, about which the User will be informed, and also if while using the Website, the User provided data, the provision of which was optional (e.g. by completing the optional fields in the form), as well as the User's marketing consent (if expressed), on the basis of which Personal Data may be processed to inform Users about services and events, the presentation of advertisements, offers or promotions for Vershold services;
- b) legitimate interest of Vershold (pursuant to art.6 par.1 lit. f) GDPR) - answering Users' questions and handling messages sent to Vershold via the form provided on the Website in the "Contact" tab, securing the possible claims; complaints service; creating analyzes, summaries for internal needs, management, operation, maintenance and improvement of the Website operation, informing the User about updates or changes introduced on the Website;
- c) or the purposes of recruitment: to conduct recruitment proceedings for a specific position (pursuant to art.6 par.1 lit. b) GDPR); also in subsequent recruitment processes, if the applicant for employment gives his consent, which can be dismissed at any time (pursuant to art.6 par.1 lit. a) GDPR; also with the consent of the applicant for employment (consent may be revoked at any time) - in the field of personal data for which the User has consented to processing (pursuant to art.6 par.1 lit. a) GDPR); to fulfill the legal obligations incumbent on Vershold in the field of labor law (requirements regarding documentation contained in the applicant's questionnaires) - (pursuant to art.6 par.1 lit. c) GDPR and applicable law obliging Vershold to process personal data). Vershold processes Personal Data provided by job candidates (e.g. in a CV) only to the extent specified in the labor law. Providing data to a wider extent than indicated in the law is voluntary and requires the consent of the User (the legal basis for this personal data is Art.6 para. 1 lit. a) GDPR). If, in the application sent or during the recruitment process, the candidate also discloses other data, not required by Vershold, it is considered that he consented to their processing, which consent can be withdrawn at any time, without affecting the lawfulness of the processing carried out before its withdrawal. If the submitted applications contain information that is not adequate to the purpose of recruitment, they will not be used or included in the recruitment process.

III.3. Vershold will notify Users of its intention to use Personal Data for purposes other than those listed in the Privacy Policy, if it is required in accordance with applicable regulations, and the use of Personal Data in this scope will occur after the User's consent.

IV. Voluntary provision of personal data

IV.1. Vershold processes Personal Data provided by job candidates (e.g. in a CV) only to the extent specified in the labor law. Providing data to a wider extent than indicated in the law is voluntary and requires the consent of the User. If, in the application sent or during the recruitment process, the candidate also reveals other data, not required by Vershold, it is considered that he consented to their processing, which consent can be withdrawn at any time, without affecting the lawfulness of the processing carried out before its withdrawal. Providing personal data for the purposes of recruitment is voluntary, with the proviso that providing it is necessary to conduct the recruitment process.

IV.2. Providing personal data in the scope of data made available in the "Contact" tab is voluntary, but necessary to contact the User and provide an answer. Providing a contact phone is voluntary and is not necessary to contact the User and provide an answer. Providing other (not required) personal data is voluntary.

V. Transfer of Users' Personal Data to third parties

V.1. Vershold does not sell, exchange, rent, disclose, transfer or otherwise provide Users' Personal Data, except where the User has given his prior consent and except in the circumstances described below.

V.2. Vershold may transfer Users' Personal Data to the following entities:

- hosting service providers, software service companies supporting Vershold, as well as legal and advisory service providers;
- entities using cookies;
- other entities entrusted with the processing of Personal Data by Vershold,

with the proviso that all indicated entities will have access only to such personal data that will be necessary to perform their specific functions and only to perform these functions - to the extent and for the time necessary to perform these activities.

V.3. Each time the catalog of recipients of Personal Data processed by Vershold results primarily from the scope of services used by the User and the User's consent or legal provisions and is clarified as a result of the User's actions on the Website.

V.4. Personal Data may be made available by Vershold if it is necessary to protect the rights or security of Vershold, other Users or third parties - as part of the implementation of legal provisions.

VI. Transfer of Users' Personal Data to third countries (outside the European Economic Area)

The collected Personal Data are stored and processed in the European Economic Area. Personal Data may be disclosed to entities located outside the European Union or the European Economic Area. Such entities may be located in countries where applicable law on the protection of personal data provides a lower level of protection than in your country of residence. In the above case, Vershold ensures an adequate level of protection by obliging entities to comply with the principles of the "Privacy Shield" program (in the case of entities from the United States of America) or by obliging the entity to sign the so-called model clauses ("EC Model Clauses") approved by the European Commission.

VII. Users' rights regarding the processing of Personal Data

Each person has the right to control the processing of data concerning him, including the right to request their updating, correction and deletion, the right to transfer Personal Data and the right to object to the processing of Personal Data - the implementation and scope of these rights is specified in the provisions of the GDPR. Requests for exercising the rights can be made using the Administrator's contact details (above).

Right of access and rectification

Each User has the right to access the content of their Personal Data, including in particular the right to information: what Personal Data are processed by Vershold, what source they come from, for what purposes they are used and information about the identity of the persons / entities to whom the data was transferred. The User also has the right to change the content of his Personal Data - to correct false or incomplete Personal Data.

The right to withdraw consent

Each User has the right to withdraw any Vershold consent expressed at any time, whereas withdrawal of consent does not affect the processing carried out by Vershold in accordance with the law before its withdrawal.

The right to limit data

Each User has the right to limit processing when one of the circumstances provided for in art. 18 GDPR, in particular, the User questions the correctness of Personal Data, the processing is unlawful, and the User opposes the deletion of Personal Data, demanding instead the restriction of their use, the User raised an objection to the processing - until it is determined whether the legitimate grounds are superior to the grounds of the User's objection. If processing has been restricted, such Personal Data may be processed, with the exception of storage, only with the consent of the User, or to establish, assert or defend claims, or to protect the rights of another natural or legal person, or for important reasons of public interest of the Union or Member State.

Right to object

Each User has the right to object to the processing of the Personal Data User carried out in order to implement the legitimate interests of the Administrator or a third party (if there are no other valid legitimate grounds for processing overriding the interests of the User), including profiling based on these provisions. If Personal Data is processed for the purposes of direct marketing, the User has the right to object at any time to the processing of his Personal Data for the purposes of such marketing, including profiling, to the extent that the processing is related to such direct marketing.

The right to delete data

The User may request the deletion of his Personal Data when one of the circumstances provided for in art. 17 GDPR, including in particular when Personal Data are no longer needed to achieve the purposes for which they were collected and there is no legitimate reason for further processing, or the processing has become unlawful, or Personal Data had to be deleted in order to fulfill the legal obligation applicable on the territory of the EU or the Republic of Poland.

Right to data portability

Each User has the right to transfer Personal Data provided by Vershold and which are processed automatically and the processing is carried out on the basis of consent or on the basis of a contract. The User may also request Vershold to transfer data directly to another data controller, if it is technically feasible.

Right to lodge a complaint

Each User has the right to lodge a complaint with the President of the Office for the Protection of Personal Data when he considers that the processing of Personal Data violates the law. Contact details to the Office: <https://uodo.gov.pl/pl/p/kontakt>

VIII. The period of storage of Personal Data

VIII.1. Personal Data will be processed by Vershold to the extent that the basis for the processing of Personal Data is the consent of the User until it is withdrawn, unless the period indicated below expires earlier.

VIII.2. Personal Data may be stored by Vershold:

- a) for reasons of Vershold legal security, until the time limitations for any claims related to the content received by the "Contact" tab, this period is determined by law or for the time necessary to submit an answer to the Users' question sent via the form in the "Contact" tab - if the question does not create a possible claim;
- b) for the period of using the Website (but may be removed three years after the User's last activity on the Website),

- depending on which of the two periods (a or b) is longer.

VIII.3. Personal Data will be processed by Vershold in order to recruit:

- a) for the position to which the offer relates - for the period necessary to conduct the recruitment process and select the candidate;
- b) as part of a spontaneous submission of a candidate - for the period necessary to conduct the recruitment and selection process, not longer than 9 months from the submission of the candidate;
- c) in the case of consent to participate in future recruitment processes conducted by Vershold, the data will be processed until the consent is withdrawn, but not longer than 9 months.

VIII.4. Users' Personal Data related to cookie technology and the like, depending on technical issues, are stored until these files are removed using browser / device settings (and deleting files is not always the same as deleting Personal Data obtained through these files, hence the possibility of opposition).

IX. Personal Data Security

Vershold uses appropriate technical and organizational measures to ensure the protection of processed Personal Data adequate to the threats and categories of data protected, and in particular protects the data against disclosure to unauthorized persons, removal by an unauthorized person, processing in violation of applicable laws and change, loss, damage or destruction. Vershold

appropriately provides, for example, the following technical measures to prevent the unauthorized collection and modification of Personal Data sent electronically.

X. Cookies

X.1. Vershold uses Google Analytics, which entities use cookies. The Google Analytics service is provided by Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA).

X.2. The cookie technology used by Google Analytics collects information about each person visiting the Website.

X.3. Google Analytics uses cookies to analyze how the Website is used. Cookies are small text information in the form of text files, sent by the server and saved on the side of the person using the Website (e.g. on the hard disk of a computer, laptop or on the smartphone's memory card - depending on which device the person using the device uses Web page).

X.4. Vershold may process data contained in Cookies when visitors of the Website use for the following purposes:

- remembering data from completed Forms in the 'Career' and 'Contact' tabs;
- remembering User's individual settings and optimizing the use of the Website;
- improving security by monitoring fraud in the process of using the Website;
- keeping anonymous statistics showing how to use the Website.

X.5. Information obtained using Cookies is saved on servers used by Google Inc., including in the United States. If you activate anonymization of the IP address while using the Website, the IP address will be shortened in the Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to the United States and shortened there.

X.6. Web browsers and devices available on the market accept saving cookies by default. It is possible to specify the conditions of using Cookies using the web browser or device settings. This means that you can partially restrict or completely disable the option of saving cookies. Please note that the use of restrictions on the storage of cookies may impede or prevent the use of the Website.

X.7. It is possible to generally prevent the transfer of data from the User's device to Google Analytics using Cookies (including the transmission of an IP address) by downloading the browser plug-in available at the following address provided by Google Inc. and installing it: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

X.8. Detailed information on the principles on which the above services operate, including the principles of data collection and processing are available here: www.google.com/intl/pl/policies/privacy/partners/.

X.9. Depending on the purposes and legal basis for processing Personal Data collected by cookies, they may be stored for the time indicated in point VIII of the Policy.

XI. Final Provisions

XI.1. The Website may contain links to other websites. These websites are outside Vershold's control and therefore Vershold cannot and shall not be responsible for any other websites, their content or privacy policy. The privacy policy of other websites may differ from the Vershold Privacy Policy. Vershold recommends that you read the privacy policies used on other websites.

XI.2. The basis for taking any actions related to the processing of Personal Data is the prior voluntary consent given by the User or the law.

XI.3. The Privacy Policy, in the light of functional changes to the Website or changes in legal regulations, may be updated. In this case, Vershold will publish new privacy policy content on the Website. With each change, a new version of the privacy policy will appear with a new date.

This Privacy Policy applies from 26.02.2020