

## Information policy in the field of personal data protection for candidates for employment (cooperation) at NOVOL sp. z o.o.

Dear Sir or Madam,

Pursuant to Article 13.1-2 of the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "GDPR"), we hereby provide the information on the method of processing your personal data and your associated rights.

### Personal Data Controller

Pursuant to Article 4.7 GDPR, Data Controller, i.e. an entity determining the purposes and means of the processing is NOVOL sp. z o.o with its registered office in Komorniki (postal code: 62-052), ul. Żabikowska 7/9 (hereinafter referred to as the "Company").

### Personal Data Protection Supervisor

The Company has appointed a Data Protection Supervisor (DPS), who may be contacted in matters concerning the protection of personal data and the exercise of associated rights. For this purpose, the Supervisor can be contacted by e-mail at: [ochrona.danych@novol.com](mailto:ochrona.danych@novol.com).

### Purpose and basis of personal data processing by the Company

**(1) In the case of persons applying for employment on the basis of a contract of employment,** their personal data within the scope resulting from the provisions of the Act of 26 June 1974 - Labour Code and its implementing acts shall be processed for the purpose of the recruitment process for the position a Candidate applies to, pursuant to Article 6.1(c) GDPR in connection with the aforementioned acts.

Providing personal data necessary to carry out the recruitment process, to the extent specified in the above-mentioned legislation, is mandatory, which arises from their content. Refusal to provide data results in the impossibility to participate in the recruitment process.

In addition, personal data beyond the scope of Article 22<sup>1</sup>.1 of the Act of 26 June 1974. - Labour Code (e.g. image) shall be processed on the basis of a voluntary consent of the Candidate (Article 6.1(f) GDPR). Expressing the consent in this regard is voluntary, and its lack shall not affect the possibility of participating in the recruitment process.

**(2) In the case of persons seeking to establish cooperation on the basis of a civil law contract,** the personal data to the extent specified in the documents submitted by the Candidate's application shall be processed for the purpose of the recruitment process for the position which the Candidate applies for on the basis of Article 6.1(a) GDPR, i.e. on the basis of the Candidate's consent.

Expressing consent by the Candidate to participate in the recruitment process is voluntary, and its possible lack shall result in the impossibility to participate in the recruitment process.

- (3) Both in the case of the Candidates applying for employment under a contract of employment, as well as a civil law contract, the processing of personal data for the purposes of taking part in future recruitment processes organized by the Company shall be based on Article 6.1(a) GDPR, i.e. on the basis of the consent granted.

Expressing the consent to participate in future recruitment processes organized by the Company by the Candidate is voluntary, and its lack prevents the implementation of the above-mentioned purpose.

### **Rights of the Candidates for employment (cooperation) in the field of data processing**

The Company guarantees the fulfilment of all rights of candidates for employment (cooperation) resulting from the provisions of GDPR, i.e.:

- right of access data,
- right to rectify data,
- right to limit data processing,
- right to delete data,
- right to transfer data – applies to the Candidates for employment who have expressed their consent to the processing of their data for a specific purpose, and the data is processed in electronic form.

In the case of data processing on the basis of a consent granted by the Candidate, the Candidate has the right to withdraw the consent at any time for any reason, will shall not affect the lawfulness of the processing of the data based on the consent before its withdrawal.

Regardless of the rights stipulated above in connection with the processing of the Candidate's personal data, the Candidate has the right to lodge a complaint to a supervisory authority, which is the President of the Office for Personal Data Protection (address: ul. Stawki 2, 00-193 Warsaw).

### **Transfer of data outside the European Economic Area (EEA)**

The Candidates' data shall not be transferred by the Company outside the European Economic Area (EEA).

An exception may be the data of Candidates whose applications were submitted via the Pracuj.pl portal that uses the services provided by suppliers located outside the EEA area. In such case, according to the information contained in the Privacy Policy of the Pracuj.pl Group, personal data may be transferred outside the EEA area. The data is transferred based on the standard contractual clauses adopted by the Commission (EU), or participation in the "Privacy Shield" program established by a Commission Implementing Decision (EU) 2016/1250 of 12 July 2016 on the adequacy of the protection provided by the EU-U.S. Privacy Shield.

## Personal data recipients

Personal data of Candidates for employment may be transferred to the companies supporting the Company in technical maintenance (including delivery, implementation and servicing of software and hardware, hosting, etc.), HR consulting and recruitment, running job advertisement portals.

## Period of storage of personal data

Personal data shall be stored for the duration of the recruitment process for a given position. If the Candidate expresses consent to participate in future recruitment processes, the personal data shall be processed until the consent expressed for this purpose is withdrawn, but not longer than for 12 months.

## Consent to the processing of personal data

*The clause concerning the consent to data processing beyond the scope of Article 22<sup>1</sup>.1 of the Act of 26 June 1974 - Labour Code, including e.g. personal data in the form of your image.*

I hereby agree to the processing of my personal data beyond the data catalogue specified in Article 22<sup>1</sup>.1 of the Act of 26 June 1974 - Labour Code by the Company (NOVOL sp. z o.o.).

YES  NO

*The clause concerning the consent to participate in future recruitment processes (for persons applying for employment under a contract of employment and civil law contract)*

I hereby agree to the processing of my personal data included in the application documents submitted by me in order to participate in future recruitment processes by the Company (NOVOL sp. z o.o.). For this purpose, the data shall be stored in a database of candidates for employment.

YES  NO

*The clause concerning the consent to participate in the recruitment process (for civil law contracts)*

I hereby agree to the processing of my personal data included in the application documents submitted by me by NOVOL sp. z o.o. with its registered office in Komorniki (postal code: 62-052), ul. Żabikowska 7/9 (hereinafter referred to as the "Company") for the purpose necessary to conduct the recruitment process (for civil law contracts)

YES  NO

Moreover, we hereby inform that in the case of consent to the processing of personal data in the above-mentioned purposes, you are entitled to withdraw your consent at any time without affecting the lawfulness of the processing based on the consent before its withdrawal.