

## **I. Policy goals**

The privacy Policy is applicable when using websites of Connectpoint sp. z o.o. (eg. in [www.connectpoint.pl](http://www.connectpoint.pl) domain), as well as in any other case, when contacting our Company.

The personal data collected by us are processed in accordance with rules stated in data protection regulations. We keep personal data in confidentiality and protect it from unauthorized third party. We hereby inform that we may be processing data as an controller or as a processor.

Our websites, tools and procedures are compatible with applicable law, i.e. regarding protection of privacy of natural person, i.e.:

1. 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),
2. Act of 18 July 2002 on Electronically Supplied Services (Dz. U. z 2020 r. poz. 344),
3. Act of 16 July 2004 Telecommunications Law (Dz.U. z 2019 r. poz. 2460).

## **II. Data controller**

Your data controller is: ConnectPoint sp. z o.o. (limited liability company), with its registered office in Warsaw, 02-227 Warszawa, entered in the Register of entrepreneurs in the District Court for the Capital City of Warsaw, XII Commercial Department of the National Court Register under position KRS: 0000347615

In all matters regarding personal data protection please contact us with this email address: [\[biuro@connectpoint.pl\]](mailto:biuro@connectpoint.pl)

## **III. Information regarding: purpose of the processing, legitimate interests of the controller, processing period and transfer to third parties:**

Through our websites and social media we collect personal data:

### **1. For marketing purposes**

All information, including personal data, shared by users of our websites (e.g. in filled forms and questionnaires) may be used for marketing purposes, with user's consent. By granting consent user agrees to receive information (i.e. commercial information) through electronic means of communication

#### **Legal basis for processing:**

Your personal data will be processed for marketing purposes and also, as a legitimate interests of a controller, for the establishment, exercise or defense against legal claims, on the ground of article 6 paragraph 1 point a) and article 6 paragraph 1 point f) respectively. User's consent is legal basis for data processing.

#### **Processing period:**

Personal data will be processed no longer than is necessary for the purposes for which they are collected, as well as for period necessary to investigate potential legal claims, that may arise in connection with the consent granted.

#### **Transfer of personal data to third parties:**

Personal data may be transferred to:

1. public authorities or other subjects, authorized by law,
2. people authorized by the processor,

- processor, processing data on behalf of the controller in order to fulfill his obligations, e.g.: subcontractors or external services providers.

## **2. For recruitment purposes**

We may be recruiting for new employees, interns, trainees and partners by means of webpages, social media as well in direct contact. Obtained personal data are used solely for the purpose of recruitment process that are active in certain moment, and for future recruitment processes – only under applicants consent. Consent applies to all documents submitted in recruitment process.

### **Legal basis for processing:**

Your personal data will be processed for recruitment process purposes and also, as a legitimate interests of a controller, for the establishment, exercise or defense against legal claims, on the ground of article 6 paragraph 1 point a) and article 6 paragraph 1 point f) respectively. User's consent is legal basis for data processing.

### **Processing period:**

Personal data will be processed for period of 12 months since submitting of the application, as well as for period necessary to investigate potential legal claims, that may arise in connection with the consent granted.

### **Transfer of personal data to third parties:**

Personal data may be transferred to:

- public authorities or other subjects, authorized by law,
- people authorized by the processor,
- processor, processing data on behalf of the controller in order to fulfill his obligations, e.g.: subcontractors or external services providers.

## **3. Social media**

We use social media for PR and recruitment purposes. We use: LinkedIn, (...).

Use of our profiles on social media also gives you the option of connecting to websites, social networking sites, applications and other tools that are independent from us. Use of those options will cause processing of your personal data by entities independent from us, i.e. social media operators. Before using profiles on social media, we invite you to familiarize with privacy policies of those entities.

### **Legal basis for processing:**

Your personal data will be processed for the purpose of advertising, market research as well as research of user behavior and preferences, as well as for establishing possible cooperation. Cooperation is based on the terms and conditions specified by the operators. Within the scope we inform about our activities, promote our events, as well as our brand, products and services. Activity on social media profiles is used to build and maintain a community related to us, through communication with available functionalities of social networks (comments, chat, messages, likes, etc.) - as a legitimate interests of a controller, for the establishment, exercise or defense against legal claims, on the ground of article 6 paragraph 1 point a) and article 6 paragraph 1 point f) respectively. User's consent is legal basis for data processing. Consent is implied through following our profile on social media.

### **Processing period:**

Personal data will be processed no longer than is necessary for the purposes for which they are collected, as well as for period necessary to investigate potential legal claims, that may arise in connection with the consent granted.

### **Transfer of personal data to third parties:**

Personal data may be transferred to:

1. public authorities or other subjects, authorized by law,
2. people authorized by the processor,
3. processor, processing data on behalf of the controller in order to fulfill his obligations, e.g.: subcontractors or external services providers,
4. social media operators, in accordance with terms and conditions specified by those operators.

#### **IV Transfer of personal data outside the European Economic Area**

Personal data will be stored on servers located in the European Union and may be transferred may be provided on the basis of standard data protection clauses – to third country, due to controllers use of cloud services, provided by Microsoft. Standard contractual clauses, consistent with the standards approved by the European Commission, used by Microsoft, are available here:

[www.microsoft.com/en-us/licensing/product-licensing/products.aspx](http://www.microsoft.com/en-us/licensing/product-licensing/products.aspx) w części Online Services Terms (OST).

#### **V Data subject's rights**

In accordance with personal data protection regulations, you have the right to:

- 1) access to the personal data, as well as right to rectification or erasure of personal data („right to be forgotten”);
- 2) object to processing of your personal data for direct marketing purposes, which will cause us to cease to process your data for direct marketing purposes;
- 3) object to processing of your personal data on grounds relating to your particular situation, if personal data is processed for the purposes of the legitimate interests pursued by the controller. Nevertheless we will continue data processing provided existence of compelling legitimate grounds for the processing on our side;
- 4) portability of data processed in connection with performance of a contract or on the basis of your consent, as well as right to restriction of processing of personal data;
- 5) if your consent is legal basis for processing, you may withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Please notice that refusal to disclose or request to erase personal data may, in certain circumstances, prevent us from contacting you, transferring information about our activity or even from performing a service.

If you do not wish us to process your data for direct marketing purposes, you have the right to object at any time to processing personal data concerning you for such purposes.

To exercise your rights please contact the data processor or data protection officer. You have the right to the right to lodge a complaint with a supervisory authority.

#### **VI Profiling**

We inform that we do not use automated decision-making and your personal data is not subject to profiling.

#### **VII Categories of processed data**

Depending on the purpose stated in section III, we may collect and process all or some of the following personal data:

1. name and surname, address, e-mail address, phone number,
2. data from questionnaires filled by you on our websites,
3. publicly available information, e.g. posts on social media,
4. unique identifiers such as mobile device identifiers or cookie IDs in the browser,
5. IP address and other data that may be determined based on IP address, such as geographical location,

6. Information about your device such as: web browser, type of device, operating system, presence or use of applications, screen resolution or preferred language.

### **VIII Collection of information with cookies**

Cookies are information data, stored in Internet service user's end device and are designed for use of service websites. We store HTTP queries directed to our server, which means that we know public IP addresses from which you browse our services. Browsed resources are identified with URL address. We also know:

1. time of the query,
2. time of response,
3. time on our domain,
4. addresses of all pages you visit in the domain,
5. statistical data on the process of browsing our portal, in particular cursor movements, clicks and page scrolling,
6. URL address of previousle visited site (referer link) – when entry to our website was through a reference,
7. information about user's browser.

Information listed above are saved in "cookie" files.

We use cookies to:

- 1) customize website content to users preference as well to optimize website use; cookies files allow to recognize user's device and to display website in accordance with user's individual needs,
- 2) create statistics hat help us understand use of websites, which enables us to improve structure and content,
- 3) improve security, through misuse control,
- 4) obtain aggregated, anonymous statistic data,
- 5) advertisement and marketing.

In our Internet service we use two bflagreasic types of cookies: session cookies and persistent cookies. Session cookies are temporary files, that are stored in end user's device until leaving the website or shutting down his software (Internet browser). Persistent cookies are stored in end user's device for the time specified in the cookie file or until they are removed by user.

By refusing consent to use of cookies when visiting our website for the first time, you inform our service not to save and use such information.

We inform that on our websites we use cookies from independent providers.

Google Analytics – cookie files of website analysis collect information on how visitors use our site, type of website from which users were redirected from, as well as about number and duration of visits on this website. Aforementioned information do not collect user's personal data but are used to develop aggregated statistic data about use of the website.

Our websites may contain links to other parties websites. We have no influence on the privacy policy of these entities and we are not responsible for it.

More information about cookies are available in section "Help" of your web browser menu.

### **Changes to Privacy Policy**

All amendments to Privacy Policy will be published in: [...], will take affect for future only and will apply after acceptance of modified Privacy Policy, that you will be informed of with a pop-up window. If you do not accept our Privacy Policy or amendments to Privacy Policy, please cease to use our website.