

Helmes-Solbeg Sp.z.o.o.

Privacy Policy

INTRODUCTION

This Privacy Policy regulates how we use your personal data at all stages of interactions with all of our users. <https://poland.solbeg.com/> and Helmes-Solbeg Sp.z.o.o. (hereinafter «Website» or «We» or “Solbeg”) value the privacy of all of our users and has established this Privacy Policy to show commitment to these rights and to safeguard your privacy. If you use our website or services, then we urge you to read this Privacy Policy and become fully informed about how it affects to your personal privacy. Please refer to this Privacy Policy to find out how to contact us if you have any questions about the contents herein. By using our Website you consent to the contents of this Privacy Policy.

- This Privacy Policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you.
- This Privacy Policy applies to the personal data of our Website users, prospective employees, partners, clients and suppliers.
- We may amend this Privacy Policy from time to time. Please visit this page if you want to stay up to date, as we will post any changes here.
- If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.
- This Privacy Policy applies in relevant countries throughout our international network. Different countries may approach data privacy in slightly different ways and so we also have country-specific parts to this Privacy Policy.

I. Privacy Policy

When you visit any website, you are providing a range of personal information about your visit to the operators of the website, depending on the actions you take. This is also the case with <https://poland.solbeg.com/>. You should always understand the privacy policies on any website when supplying information during your use of the website. You should always ask for a copy of the privacy policy if the website does not make the information available to you.

We will only use the personal data you send to us during your visits for the purposes of internal tracking. This includes the activities of making <https://poland.solbeg.com/> and other our websites more effective for you to use our Website's features and services and responding appropriately to your requests for information. Unless specifically mentioned, we do not use your personal data for any other reason. We will never sell your personal data to a third party, and we will never give a third party access to your personal data, except as may be provided in separate agreement with you or unless required to do so by law.

II. Types of personal data collected

When you use or register on the https://poland.solbeg.com , we only collect personal data that you provide of your own accord. It is possible to browse our Website without registering, but you will need to register for the purpose of using certain features and services that we offer. By registering on our Website you will provide and share your personal data with the public and with other users. Something that is public can be seen by anyone.

Personal data we collect automatically when you use our services or register for an account with us:

- we collect data about your interaction with our services and your communications with us. This is personal data we receive from devices (including mobile devices) you use when you access our services. This personal data could include the following: device number, device ID or unique identifier, device type, and unique device token, operating system and applications used, application crash-data, IP address, User agent, platform, Software Development Kit version, anonymous User ID, time stamp Developer Key, application version, device identifiers such as: IDFA (Identifier For Advertisers), Android ID (Android device), referrer url (Playstore), Google Advertiser ID, device model, manufacture, OS version, in-app events, and network status (WiFi/3G), Login source, application use, age, gender, if profile is linked to Facebook/Google, number of photos in profile, interests, notification status, registration date, credits bought, date of last payment and use of services;
- location personal data, including location personal data from your mobile device including specific geographic locations through IP, GPS, Bluetooth, or WiFi signals;
- computer and connection personal data such as statistics on your page views, traffic to and from the websites, referral URL, ad data, your IP address, your browsing history, and your web log personal data;

Personal data we collect using cookies and similar technologies:

Every time you visit the Website, you will be prompted to accept or refuse [cookies](#). If you not refuse them, the Website may automatically collect some non-personal information from you about your computer including by using “cookies” which are stored on the hard drive of your computer (for example, your IP address, the operating system and browser you are using, the frequency of your visits, which pages on the Website are most viewed) for system administration, to speed up your searches, to help Solbeg understand how the Website is being used and to improve your experience on the Website. This information also facilitates your use of the Website and ensures that you do not need to re-enter your details every time you visit it. You can erase or block this information from your computer if you want to; your user manual or help files should give instructions on how to do this. Unless you have adjusted your browser setting so that it will refuse cookies or do it via special form at Website (most browsers automatically accept cookies by default), our system may issue cookies when you log on to the Website.

We use cookie technology on <https://poland.solbeg.com> as part of the statistical reporting on our website. It contains personal data used by a website to personalize your experience (e.g. rotating profiles on the <https://poland.solbeg.com> home page) and to gather statistical data, such as which pages are visited, what is downloaded during your experience, the domain name and country of the internet provider that you have come from (e.g. ‘yahoo’, or ‘solbeg.com’), and addresses of those websites you have visited just before and after <https://poland.solbeg.com>. Nevertheless, we do not associate any of this personal data with you as an individual. Only an aggregate measure is taken. Cookie personal data allows us to follow your «click stream» activity (i.e., how visitors navigate our website as they move from page to page). It is important to note that cookies never capture your individual email address or any of your private personal data.

We also operate standard web server log files to assist in counting visitor numbers and analyzing our website’s technical capability. This personal data is used to establish how many people visit <https://poland.solbeg.com>, enable us to organize the pages for the best usability,

make the website suitable for your browser, and ensure that our pages are working at their full potential. Although we collect personal data on website traffic we do not record personal data on particular visitors to our website, which means that no personal data about you as an individual is retained or used. You are able to browse the website without cookies by configuring your browser to reject all cookies, or to alert you when a cookie is sent. Since each browser is different, you should refer to the «Help» menu of your browser to learn how to change your cookie preferences.

Personal data we collect from other social media:

We may allow you to create your account with the respective social media site (e.g. Facebook, Google or other). Those social media sites may give us automatic access to certain personal data retained by them about you. You control the personal data you share with us through the respective social media you used for registering account with us privacy settings on the applicable social media site and the permissions you give us when you grant us access to the personal data retained by the respective social media site about you. By associating an account managed by a social media site with your account on our Website and authorizing us to have access to your personal data, you agree that we can collect, use and retain the personal data provided by these social media sites in accordance with this Privacy Policy and privacy policy of respective social media site in part of personal data transfer to us.

Third-party Cookies:

We use analytics packages from trusted third parties in order to constantly improve your browsing experience on our websites. Our trusted partners help us serve advertising and analytics and may place cookies on your device. You can find their privacy policies in the list below. Please read their privacy policies to ensure that you are comfortable with the manner in which they use cookies.

- Use of Google Analytics, Google DoubleClick are subject to [Google Privacy Policy](#);
- Use of Facebook Pixel is subject to [Facebook Privacy Policy](#);
- Use of Yahoo is subject to [Yahoo Privacy Policy](#);
- Use of Microsoft Bing Ads is subject to [Microsoft Privacy Statement](#).

While we do our best to keep this list updated, please note that third parties who place cookies on your device may change from time to time, and there may be a slight delay updating the list. Also, you can generally activate or later deactivate the use of cookies through a functionality built into your web browser or mobile device.

To learn more about how to control cookie settings through your browser:

- [Firefox](#)
- [Chrome](#)
- [Internet Explorer](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)

- [Android Browser](#)

For other browsers, please consult the documentation that your browser manufacturer provides. You can opt out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance (<http://youradchoices.com>)

Personal data you provide us (we collect from you) when you use our services or register for an account or employee (prospective employee) profile with us:

- **Prospective employees.** We only ask for details that we think will genuinely help us to provide the best possible employment opportunities that are tailored to you, such as your name, age, contact details, education details, employment history, emergency contacts, immigration status, financial information (where we need to carry out financial background checks), and social security number (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and requirements, we will also collect information related to your health, diversity information or details of any criminal convictions. It is your voluntary decision whether to provide us with any such personal information, but if you refuse to provide such information we may not be able to register you to receive our services. Depending on the relevant circumstances and applicable local laws and requirements, we will collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:
 - Name;
 - Age/date of birth;
 - Birth number;
 - Sex/gender;
 - Photo;
 - Marital status;
 - Contact details;
 - Education details;
 - Employment history;
 - Emergency contacts and details of any dependents;
 - Referee details;
 - Immigration status (whether you need a work permit);
 - Nationality/citizenship/place of birth;
 - Start date or availability date;
 - A copy of your driving license and/or passport/identity card;
 - Bank details;
 - Financial information (where we need to carry out financial background checks);
 - Social security number (or equivalent in your country) and any other tax-related information;
 - Diversity information (racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information);
 - Details of any criminal convictions if this is required for a role that you are interested in applying for;

- Details about your previous and current remuneration, pensions and benefits arrangements;
- Child care or care arrangements (for example, when you authorize a deduction from pay for childcare vouchers or when you volunteer this information);
- Sexual orientation (for example where you disclose this through providing next-of-kin details);
- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website or from links clicked on in emails from us;
- Extra information that you choose to tell us;
- Extra information that your referees choose to tell us about you;
- Extra information that our Clients may tell us about you, or that we find from other third party sources such as job sites;
- IP address;
- The dates, times and frequency with which you access our services; and
- CCTV footage if you attend our premises.

Please note that the above list of categories of personal data we collect is not exhaustive. We may collect your personal data in the following ways:

- Entering your details on the Website or via an application form, as part of the registration process;
- Leaving a hard copy CV at our recruitment events, job fairs or offices;
- Emailing your CV or other information to our consultant or being interviewed by them;
- Applying for jobs through a job aggregator, which then redirects you to the Website;
- Entering a competition through a social media channel.

We may also receive personal data from other sources. Depending on the relevant circumstances and applicable local laws and requirements, this will involve personal data received in the following situations:

- Your referees may disclose personal information about you;
- Our partners, suppliers and other employees may share personal information about you with us;
- If you 'like' our page on Facebook or 'follow' us on Twitter or other social medias we will receive your personal information from these sites.

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we will also collect your data automatically or through you providing it to us.

- **Clients, Suppliers and other Website Users.** We collect a limited amount of data from our Website users which we use to help us to improve your experience when using our Website and to help us manage the services we provide. This includes information such as your name and contact details as well as how you use our Website, the frequency with which you access our website, and the times that our website is most popular. We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone or email; and/or;
- Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

Where appropriate and in accordance with any local laws and requirements, we will seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence:

- From third party market research and by analyzing online and offline media (which we will do ourselves or employ other organizations to do for us);
- From delegate lists at relevant events; and
- From other limited sources and third parties (for example from our Partners to the extent that they provide us with your details to act as a referee for them or where they give feedback on a particular assignment).

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we will also collect your data automatically or through you providing it to us. When you visit our Website there is certain information that we will automatically collect, whether or not you decide to use our services namely your IP address, the date and the times and frequency with which you access the Website, the way you browse its content and other technical information. We will also collect data from you when you contact us via the Website, for example by using the chat function. We collect your data automatically via cookies, in line with cookie settings in your browser.

III. The use and share of the collected personal data

We use your personal data to provide you with our services, to propose a suitable employment opportunity, to comply with our legal obligations and to protect your vital interest. This includes:

- management of your account (profile) and preferences, operate, measure and improve our services, keep our services safe, secure and operational, and customize Website content that includes services that you may like in response to actions that you take;
- provision of customer support, to contact you regarding your account, to resolve any dispute and answer your questions and enquires;
- provision of marketing information and special offers, different kind of notifications about our services (you have the right to withdraw, opt-out, your consent at any time);
- provision of analytics, improve services, monitor and develop the personal data security of our Website and mobile applications, measure the performance of our marketing and advertising campaigns;
- detection and protection against fraudulent transactions and other suspicious activities;
- to create aggregated data for internal use or for improving services/websites and creating new features. Aggregated data is anonymous and is not linked to any personal data. Aggregate Information helps understand trends and customer needs so that new products and services can be considered and so existing products and services can be tailored to customer desires. We may share such aggregated data

with our partners, without restriction, on commercial terms that we can determine in our sole discretion.

So, generally, We use you data in the following ways:

- Recruitment and Employment;
- Marketing;
- Equal Opportunities Monitoring; and
- To resolve and defend any legal claims.

Where it is allowed by the law we can use this data for profiling.

Recruitment and Employment. For your convenience we listed below the various ways in which we will use and process your personal data for these purposes, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- To facilitate our employment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;
- Allowing you to participate in specialist online training;
- Allowing you to participate in the interactive features of our services, when you choose to do so;
- Carrying out our obligations arising from any contracts entered into between us;
- Facilitating our payroll and invoicing processes;
- Carrying out customer satisfaction surveys;
- Verifying details you have provided or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties;

We will use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object (see below).

Marketing. We may periodically send you information that we think you may find interesting, or to ask for your help with references. In particular, we will to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. To:

- enable us to develop and market other products and services;
- market our full range of services (permanent, temporary, contract, outplacement) to you;

- send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;
- display promotional excerpts from your details on Solbeg' website(s) as a success story (only where we have obtained your express consent to do so); and
- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Solbeg.

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing of our services to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in.

Soft opt-in consent is a specific type of consent which applies where we have obtained your contact details from an occasion when you previously engaged with us (for example by submitting a job application or CV). Under 'soft opt-in' consent, we will take your consent as given unless or until you object or opt out (and we will remind you of your right to do this in each e-marketing message that we send to you).

For other types of e-marketing, we are required to obtain your explicit consent. If you are not happy about our approach to marketing, you have the right to opt out or withdraw your consent at any time (see below how to do it).

Equal opportunities monitoring and other sensitive personal data. We are committed to ensuring that our employment processes are aligned with our approach to equal opportunities. Some of the data we will (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. This diversity information is what is called 'sensitive' or 'special category' personal information and slightly stricter data protection rules apply to it.

Where appropriate and in accordance with local laws and requirements, we'll use this information on an anonymized basis to monitor our compliance with our equal opportunities policy. We will also disclose this (suitably anonymized where relevant) data to partners (including to their internal or external auditors) where this is contractually required or the partner specifically requests such information to enable them to comply with their own employment processes.

We will collect other sensitive/special category personal data about you such as health-related information or religious affiliation if this is appropriate in accordance with local laws. In such circumstances we'll use this information to comply with employment rights and obligations.

We may also collect details of any criminal convictions if appropriate in accordance with local laws. In these circumstances, we are required to obtain your explicit consent in order to do so. We will ask for such consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to use collecting and using this information.

To help us to establish, exercise or defend legal claims. In more unusual circumstances, we will use your personal data to help us to establish, exercise or defend legal claims.

We also may use your personal data for Profiling as a type of processing activity which involves our use of information that we collect about you in order to build a "profile" about you. This helps us to get a better idea of what you're like and your interests, likes and dislikes, all of which enable us to provide the best possible service to you.

- send you personalized emails (which, for example, might reflect what we think are your preferences);
- make recommendations for editorial content that we think may be of interest to you (e.g. reports about developments in your industry);
- send you tailored or more relevant marketing communications (the contents of which may, for example, reflect how you have responded to or interacted with previous marketing communications from us).

As new and better technology becomes available we will use it to help you as efficiently and as effectively as possible. We may use automated or artificially intelligent systems, which may include systems provided by third parties, to analyze data we have about you and make decisions about you based on this data. This includes applying machine learning to prospective employee personal data in order to help us come up with the best possible shortlist for a particular role. Such technology should reduce significantly the amount of time needed to consider when candidates might be the best fit for relevant jobs. This should in turn make the recruitment process much more efficient and effective, which, we hope, will improve your overall experience with us. We may use automated decision making in relation to your personal data where we deem this to be necessary for the completion of pre-contractual steps taken at your request.

Following links to other websites

If you click on a link that takes you away from <https://poland.solbeg.com> to another website, you should remember that this Privacy Policy of <https://poland.solbeg.com> no longer apply to the new website you visit. All your activity on any other website, including any website with a link on <https://poland.solbeg.com>, is subject to the rules and regulations of that website. Therefore, we recommend that you read all the policies of new websites you visit to fully understand their rules and regulations for collecting, using, and sharing your personal data.

We may share your personal data you provide to us with specially selected service providers who assist us in delivering the products and services we offer for the sole purpose of providing the services or when we consider their services or products to be of interest to you. These service providers must adhere to strict confidentiality obligations in a way that is consistent with this Privacy Policy and the agreements we enter into with them. We may cooperate with external service providers to:

- oversee a customer personal data database;
- help us in sending out emails, sms (message and data rates may apply) and presents;
- help us with direct marketing;
- assist us with storage and data analysis;
- prevent from fraudulent activities;

- help us in maintaining, developing and improving our systems/websites/applications/services;
- collect payments.

We may transfer or share a copy of your personal data in cases where <https://poland.solbeg.com> or one of its properties, affiliates, or subsidiaries is part of a business transition, such as a merger, being acquired by another company, or selling part of its assets.

The personal data may be used for legal purposes by us or the Data controller and any of its affiliates, subsidiaries, directors and etc., in court or to protect against the contravention or unauthorized use of our website, to defend or protect our rights.

We may share personal data internally within our family of companies or with third parties for purposes described in this Privacy Policy. Personal data collected within the European Economic Area («EEA») may, for example, be transferred to countries outside of the EEA for the purposes as described in this Privacy Policy. We utilize standard contract clauses approved by the European Commission, adopt other means under European Union law, and obtain your consent to legitimize data transfers from the EEA to the United States and other countries.

By posting any content, messages, photos and/or videos to any public area of the website/application You automatically grant, represent and warrant that You have the right to grant to Website an irrevocable, perpetual, non-exclusive, fully paid, worldwide license to use, copy, perform, display, and distribute such personal data and content and to prepare derivative works of, or incorporate into other works, such personal data and content, and to grant and authorize sublicenses of the foregoing.

For content that is covered by intellectual property rights, like photos and videos (IP content), you specifically give us the following permission, subject to your privacy and application settings: you grant us a non-exclusive, transferable, sub-licensable, royalty-free, worldwide license to use any IP content that you post on or in connection with Website / application (IP License).

You hereby agree that the Website may at its own discretion use any available channels of communication (including, but not limited to Email, phone, sms, push notifications, Whatsapp, Facebook, Wechat, Telegam and any other messengers) for customer support and/or marketing purposes if You have provided us such. You may at any time cancel Your consent on such communication by contacting our Customer Support team.

We may share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with any of our group companies and associated third parties such as our service providers and clients where we feel this will help us to provide you with the best possible service and maximize your chances of getting what you want. Unless you specify otherwise, we will share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive from us is targeted to you. Where appropriate and in accordance with local laws and requirements, we will share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group companies;

- Appropriate colleagues within Solbeg (this may include colleagues in overseas offices);
- Individuals and organizations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- Service providers (whether third parties or our group companies) who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, administration functions, technical support functions and IT consultants);
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- Prospective referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- If We merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

IV. Safeguards of your personal data

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorized access. We do this by having in place a range of appropriate technical and organizational measures. These include measures to deal with any suspected data breach. If you suspect any misuse or loss of or unauthorized access to your personal information please let Data Controller know immediately.

The Data Controller processes the personal data of users of <https://poland.solbeg.com> in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of the personal data.

The personal data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data controller, in some cases, the personal data may be accessible to certain types of persons in charge, involved with the operation of the website (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communication agencies) appointed, if necessary, as Data Processors by the Data controller.

The Data Controller has secure certificates from appropriate providers that show the website is approved, fully tested, and certified by these two expert security systems. This means that you are safe from any viruses, identity theft, spyware, fraudulent credit card activity, spam, and internet scams.

The Personal data is processed at the Data controller's operating offices and in any other place where the parties involved with the processing are located.

V. Retention time and deletion of personal data. The rights of access and opt-out

The Personal data is kept for the time necessary to provide the services to you and you can always request that the Data Controller suspend or delete your personal data. If You wish to delete personal data we have collected during your use of Website, you should send a request to our Support Team or Data Controller. Processing of your request will take some time to take effect. Thank you for your patience. Please note that changing or deleting your personal data will only change or delete the data in our database for purposes of future activities and for managing future communications. These changes and deletions will not change or delete emails or personal data Website may have already forwarded to other users or credit card companies or any other third parties, all as provided above in this Privacy Policy. Further, if you delete your personal data from the Website, but continue to use other our websites/applications/services, you may receive emails from us regarding those websites/applications/services. However, we may elect to keep your personal data, subject to the requirements of the law and legitimate interests of the Data Controller. In case of your request to delete all your personal data, you agree that your email will be stored in our database to avoid creation of duplicate accounts and for identification purposes. The email will not be used in marketing activities, nor forwarded to any partner websites or Third parties.

We may also delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected. When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services.

If we employ or engage you as an employee, we will ordinarily process your data throughout the course of our relationships and will then retain it for a period after we have parted ways. The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. For example, we may be required to retain certain data for the purposes of tax reporting or responding to tax queries. We may also retain it if it might be relevant to any potential litigation. In jurisdictions that allow it, we will generally retain personal data relating to you where necessary to enable us to provide you or a future employer with a reference.

In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorized use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above).

You have the right, at any time, to change or delete your Personal data sending a request to our Support Team or Data Controller and they will guide you through the process.

You can decide which correspondence to receive from us in accordance with our policy on freedom of choice and opting out. To stop receiving correspondence you can click the unsubscribe link found at the bottom of each email you receive or by emailing your request to us at unsubscribe@solbeg.com or by changing the settings in your profile.

VI. Rights of EU users

In addition to rights set out in the section V of this Privacy Policy, if you are located in the European Union, as a data subject (a person whose personal information is collected, stored and processed) you have several rights under [GDPR](#):

- You have the right to obtain confirmation if your personal information is being processed by us. If that is the case, you can access your personal information and the following information: (a) the purposes of the processing; (b) the categories of personal information; (c) to whom the personal information have been or will be disclosed; (d) the envisaged period for which the personal information will be stored, or the criteria used to determine that period.
- If you would like to have a copy of your personal information from us, we will provide it based on (1) you will prove your identity, (2) it will not adversely affect the rights and freedoms of others.
- You have the right to demand that we erase your personal information, and we shall erase it without undue delay where one of the following grounds applies: (a) this personal information is no longer necessary in relation to the purposes for which they were processed; (b) you withdraw consent if the processing was based on your consent, and where there is no other legal ground for the processing; (c) you object to the processing and there are no overriding legitimate grounds; (d) your personal information have been unlawfully processed; (e) your personal information have to be erased for compliance with a legal obligation.
- You have the right to receive your personal information which you provided us in a structured, commonly used and machine-readable format and have the right to transmit those data to another company, where: (a) the processing is based on your consent or on a contract; and (b) the processing is carried out by automated means.
- You have the right to withdraw you consent for processing of your personal information at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal information infringes GDPR.

VII. INTERNATIONAL DATA TRANSFERS

In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred:

- between and within Solbeg entities;
- to third parties (such as advisers or other partners to the Solbeg business);
- to overseas partners where applicable;

- to partners within your country, where applicable, who may, in turn, transfer your data internationally;
- to a cloud-based storage provider; and
- to other third parties, if allowed by the law.

We will only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract); or
- where you have consented to the data transfer.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

VIII. Changes to this Privacy Policy

Solbeg reserves the right to replace, modify or amend this Privacy Policy at its own discretion. It is your responsibility to review this page and check for any Privacy Policy updates. Please note the latest modification date at the bottom of the Privacy Policy.

IX. Data Controller and Supervisory Authority contact information

Data Controller of the Website is Helmes-Solbeg Sp.z.o.o., located at: ul. Twarda 18, 00-105 Warsaw, Poland, NIP or tax identity no: 5272960484, KRS number: 0000905313, REGON: 389158739. Contact email: EUPP@solbeg.com

Details of local supervisory authority - Urząd Ochrony Danych Osobowych, located at: ul. Stawki 2, 00-193 Warszawa, Poland, tel. 22 531-03-00. Contact email: iod@uodo.gov.pl

X. Acceptance of this privacy policy

Our website and your use of it, including any issue concerning privacy, is subject to this Privacy Policy and the related Terms & Conditions. When you use our website, you accept the

conditions set out in this Privacy Policy and the related Terms. You signify and guarantee that you will never generate any databases, websites, software, legal entities and services that compete with <https://poland.solbeg.com>. Such behavior will be fully investigated, and necessary legal action will be carried out, including, without limitation, civil, criminal, and injunctive redress.

The acceptance of this Privacy Policy and applicable Terms are considered as a pre-condition for the use of our Website and our services.

Last updated January, 2022