

PRIVACY POLICY FOR THE USE OF COOKIES ON THE AAS RECRUITMENT WEBSITE

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I. Introduction

1. General provisions

This privacy policy and the use of cookies applies to information on data processing in connection with the use of the <https://aasrecruitment.com> website (hereinafter referred to as the Website).

The Administrator respects the Website Users' right to privacy. In particular, it cares for the protection of their Personal Data and applies appropriate organizational and technical solutions to prevent interference with Users' privacy by third parties. The Administrator's actions are aimed at guaranteeing the User a feeling of full security at a level appropriate to the applicable law.

Entering and using the Website means that the User accepts the terms of this Policy.

The Website may contain links referring to other websites. Web pages will open in the same or a new browser window. The administrator is not responsible for the content provided by these websites. As this privacy policy and the use of cookies applies only to the Website <https://aasrecruitment.com>, the User is obliged to read the privacy policy or regulations in force on the website to which the User has entered via the referring link.

II. User's Personal Data

1. Who is the Administrator of the User's Personal Data?

The administrator of Personal Data processed in connection with the operation of the Website and the provision of its Services is AAS RECRUITMENT sp.z o.o., ul. Ferdynanda Focha 53/5, 42-200 Częstochowa (KRS: 0000255644).

2. What Personal Data is processed by the Administrator?

2.1. Depending on the type of services provided on the website, the Administrator processes the following Personal Data of the Website Users:

2.1.1. for the Website's services: personal data only of those Users who have consented to the processing of cookies and similar technologies:

- hostname;
- browser type;
- operating system type;
- access time;
- addresses of website visitors;
- the address of the website from which the User came to the Website;
- other User identifiers.

2.1.2. for the Messenger service: all information provided voluntarily by the User, which will be necessary to resolve the matter initiated by the User, in particular it may be the following data:

- identifying, such as name, surname,
- contact details, such as e-mail address, telephone number,
- other information provided by the User;

2.1.3. for the Form service: all information provided voluntarily by the User, which will be necessary to resolve the case initiated by the User, in particular, it may be the following data::

- identifying, such as name, surname,
- contact details, such as e-mail address, telephone number,
- other information provided by the User.

2.2. Please be advised that by using the Website by the User without changing the software / browser settings, the User consents to the storage of cookies on his end device and the use of information stored in them. By default, the browser has the settings enabled to process the said data.

2.3. If it is necessary to conduct a procedure to determine possible claims or defend against them, including a complaint procedure, the data identifying the participants in the procedure will be processed, including the name and surname and any additional data necessary to conduct the procedure.

3. Is the provision of Personal Data by the User obligatory?

3.3. Site service

Providing Personal Data indicated in paragraph 2.1.1. is voluntary. The User's activity on the Website, including his Personal Data, is recorded in system logs (a special computer program used to store a chronological record containing information about events and activities related to the IT system used to provide services by the Administrator). Information about the visited pages and the use of the Website and the Services available within it are also provided by cookies. All these tools contribute to the user-friendliness of the Website. Therefore, failure to provide them may affect the convenience of using the Website, prevent the use of a part of the Website or prevent the display of some information intended for the User.

Communicator
Providing Personal Data in the text of the message sent via the Messenger is voluntary, but it may be necessary to accept and handle the inquiry, and failure to do so results in the inability to service.

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Providing Personal Data in the text of the message sent via the Messenger is voluntary, but it may be necessary to accept and handle the inquiry, and failure to do so results in the inability to service.

3.5. Form

Providing Personal Data in the form is voluntary, but necessary to contact the User. Failure to provide Personal Data results in the inability to use the Form service.

4. For what purposes and on what legal grounds are Personal Data processed?

The Administrator processes Personal Data for the following purposes:

a) in order to provide the Services available on the Website by electronic means, i.e. the Website service, Live Chat service and the Form service - then the legal basis for processing is the necessity of processing to perform the contract for the use of the Website services (Article 6 (1) (b) of the GDPR);

b) for technical and administrative purposes, for the purposes of ensuring the security of the IT system and managing this system, for analytical and statistical purposes - then the legal basis for processing is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR) consisting in ensuring the application of the appropriate level of provided services;

c) in the case of sending marketing content to the User as part of own marketing - the legal basis for processing is the legitimate interest of the Administrators (Article 6 (1) (a) of the GDPR), which is the promotion of the Administrator's and its Capital Group's services;

d) in order to possibly establish and pursue claims or defend against them - the legal basis for processing is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR) consisting in the protection of his rights.

5. How long is Personal Data processed?

The period of processing Personal Data by the Administrator depends on the type of service provided and the purpose of processing. The period of processing Personal Data may also result from legal provisions, when they constitute the basis for processing. In the case of processing Personal Data on the basis of the Administrator's legitimate interest - e.g. for security reasons - the data is processed for a period enabling the implementation of this interest or until an effective objection to data processing is raised. If the processing is based on consent, Personal Data is processed until its withdrawal. When the basis for processing is necessary to conclude and perform the contract, Personal Data is processed until its termination / expiry. The period of Personal Data processing may be extended if the processing is necessary to establish or pursue claims or defend against claims, and after this period - only if and to the extent that it will be required by law. After the expiry of the processing period, Personal Data is irreversibly deleted or anonymized.

6. Recipients of Personal Data

6.1. Users' Personal Data may be made available to entities providing services on behalf of the Administrator and on his behalf, e.g. for the operation of the Website and available Services, in particular in the field of IT services,

marketing services, analytical services, archiving, professional consulting. The administrator will provide this data on the basis of a contract for entrusting the processing of personal data or another legal instrument in accordance with art. 28 GDPR, which will ensure adequate protection of the Personal Data provided.

6.2. The Personal Data processed by the Administrator will not be made available to third parties, subject to paragraph 6.1. above, unless:

- a) on the obligation to provide Personal Data results from applicable law or when the transfer of Personal Data serves the purposes of protecting the Administrator's rights or settling disputes; or
- b) The user has consented to the transfer of personal data to third parties.

6.3. In each of the above Situation, Personal Data may be made available only if there is an important legal basis for it (i.e. consent, e.g. in the case of marketing, contract or legitimate interest).

6.4. The Administrator undertakes not to sell Users' Personal Data.

7. P Transfer of Personal Data outside the European Economic Area

In connection with the Administrator's use of the services of international suppliers, e.g. by using analytical tools provided by Google or Facebook, it is possible to transfer the User's Personal Data outside the European Economic Area (EEA), provided that an adequate level of protection of Personal Data is ensured, which will be found in in particular through:

- a) cooperation with entities processing personal data in countries for which a relevant decision of the European Commission has been issued,
- b) use of standard contractual clauses issued by the European Commission,
- c) application of binding corporate rules approved by the competent supervisory authority.

8. Is the User profiled on the basis of Personal Data and are decisions that affect him or her made automatically on this basis?

The administrator uses anonymized Personal Data to perform the evaluation and profiling in an automated manner. This evaluation and profiling are carried out to analyze data on the User's activity on the Website, to collect demographic data about the User or to personalize the content of the Website in order to run it. This profiling has no legal consequences for the User, nor does it have any impact on the User's ability to use the Website. Therefore, these data are processed only for the purposes of administering the website and ensuring efficient service.

III. User rights

1. Right of access

The User has the right to obtain information at any time whether and what his Personal Data is being processed by the Administrator. If the Administrator processes his Personal Data, the User may gain access to them or may ask the Administrator for a copy of the Personal Data subject to processing. The first copy of Personal Data is free of charge, the issuance of further copies may be subject to a fee.

2. The right to correct Personal Data

The User may at any time request the Administrator to immediately correct his Personal Data that is incorrect or incomplete.

3. The right to limit the processing of Personal Data

The User may at any time request the restriction of the processing of his Personal Data by the Administrator. If the request is justified, the Administrator will only be able to store this Personal Data. Undertaking any operations other than storage will require a separate consent, unless the processing is necessary due to the protection of claims or rights of another person or due to important reasons of public interest.

4. The right to transfer Personal Data

If the User's Personal Data is processed in an automated manner on the basis of the User's consent or in connection with the performance of the contract, the User may at any time request the Administrator to obtain his Personal Data in a structured, commonly used machine-readable format. At the request of the User, Personal Data will be sent by the Administrator to another administrator indicated by the User, if technically possible.

5. The right to delete Personal Data (the so-called right to be forgotten)

The User has the right to request the Administrator to immediately remove his Personal Data, and the Administrator, if one of the grounds indicated in art. 17 GDPR, is obliged to remove them without undue delay.

6. Right to object

If the Administrator processes the User's Personal Data on the basis of a legitimate interest, the User may object to this processing at any time.

7. The right to withdraw consent

- 7.1. The User may withdraw the consent given to the processing of Personal Data at any time. Withdrawal of consent, however, does not affect the lawfulness of the processing which was carried out on its basis before its withdrawal.
- 7.2. To withdraw consent effectively, in the case of using the Website and its Services, contact the Administrator in the manner indicated in chapter III.9.6.
- 7.3. The administrator ensures that the request to withdraw consent will be considered immediately. After completing the request, the Administrator will cease to process the User's Personal Data processed on the basis of consent (including to receive marketing and commercial information by e-mail and by phone). Until the request is processed, however, the User may receive information from the Administrator, from which he resigned when withdrawing consent, due to the time needed to execute the request in the User's systems.
- 7.4. The User's withdrawal of consent to the processing of Personal Data does not exclude further processing of this Personal Data, with the proviso that further processing will take place for a different purpose and on a basis other than the processing carried out on the basis of consent.

8. Right to lodge a complaint

The User has the right to complain to the supervisory body dealing with the protection of personal data. The administrator proposes to contact him directly in the manner indicated in chapter III.9.6, which may simplify and speed up the settlement of the matter.

9. How can the User contact the Administrator and enforce his rights?

- 9.1. When sending a request to the Administrator, the User should do it in such a way as to clearly determine what the request concerns, i.e. in particular:
 - a) which right the User wants to use;
 - b) what processing the request concerns.
- 9.2. If the Administrator is not able to identify the person submitting the application on the basis of the submitted application, he will ask the User for additional information.
- 9.3. The application may be submitted in person or through an attorney. Due to the security of Personal Data, the Administrator encourages the use of a power of attorney in a form certified by a notary or an authorized legal advisor or attorney, which will significantly speed up the verification of the authenticity of the application.
- 9.4. The reply to the application should be given within one month of its receipt. If it is necessary to extend this period, the Administrator informs the applicant about the reasons for the extension.
- 9.5. The answer is provided via traditional mail, unless the application was submitted by e-mail or an electronic response was requested.
- 9.6. In order to execute their rights, the User may contact the Administrator:
 - a) in writing, by sending correspondence to the Administrator's address;
 - b) in the form of an e-mail to the e-mail address of AAS Recruitment sp.z o.o.: odo@asrecruitment.com.

IV. Cookies and other internet technologies

In order to improve the Website, facilitate its use and best adapt it to the User's needs, the Administrator uses cookies and other Internet technologies.

1. Cookies

1.1. The Website uses two basic types of cookies:

- a) "session" cookies - which are temporary files stored on the User's end device until logging out, leaving the website or turning off the software (web browser);
- b) "persistent" Cookies - which are stored in the User's end device for the time specified in the parameters of Cookies or until they are deleted by the User.

1.2. Cookies are used for the following purposes:

- a) adjusting the content of the Website pages to the User's preferences and optimizing the use of websites; in particular, these files allow to recognize the device of the Website User and properly display the website, tailored to his individual needs;
- b) creating statistics that help to understand how Website Users use websites, which allows improving their structure and content..

1.3. We use the following cookies on the website:

- a) „necessary" cookies, enabling the use of services available on the Website, eg authentication cookies used for services that require authentication on the Website;
- b) Cookies used to ensure security, e.g. used to detect fraud in the field of authentication on the Website;
- c) "performance" cookies, enabling the collection of information on the use of the website pages;
- d) "functional" cookies, enabling "remembering" the settings selected by the User and personalization of the User's interface, e.g. in terms of the selected language or region of the User's origin, font size, website appearance, etc.

1.4. In many cases, the software used for browsing websites (web browser) allows cookies to be stored on the User's end device by default. The User's consent to accepting "cookies" takes place by changing the browser settings enabling the processing of "cookies" or by expressing consent in the appropriate "window" on the Website. Website Users can change their cookie settings at any time. These settings can be changed in particular in such a way as to block the automatic handling of cookies in the web browser settings or to inform about their every posting on the Website User's device. Detailed information on the possibilities and methods of handling cookies is available in the software (web browser) settings.

1.5. Please be advised that restricting the use of cookies may affect the convenience of using the Website, prevent the use of parts of the Website or Services, or prevent the display of some information intended for the User. Above all, however, it will prevent the Administrator from obtaining anonymous statistical information to improve the quality of the Website.

2. Other Internet Technologies

2.1. In order to conduct marketing and remarketing activities, the Administrator uses the following technologies to observe the actions taken by Users on the Website:

- a) Mautic - The Administrator uses the Mautic service, which aims to provide anonymous information about Users' activity on the Website in order to precisely adjust and monitor the emission of advertisements;
- b) Facebook conversion pixel - Pixel Facebook uses the "Cookies" technology, i.e. text files placed on the User's device, in order to enable the Administrator to analyze the sources of traffic and the manner in which visitors use it. Pixel Facebook collects on its servers data obtained from placing cookies on devices and uses this information to create reports and provide other services related to the movement and use of the Internet. Pixel Facebook may also transfer this information to third parties if it is required to do so by law or if these persons process such information on behalf of Facebook. These data are never combined with the data provided by the User and are only material for statistical analysis and mechanisms for correcting system errors;
- c) Google Analytics - Google Analytics uses the "Cookies" technology, i.e. text files placed on the User's device, in order to enable the Administrator to analyze the sources of traffic and the manner in which visitors use it. Google collects on its servers data obtained from placing cookies on devices and uses this information to create reports and provide other services related to the traffic and use of the Internet. Google may also transfer this information to third parties if it is required to do so by law or if these persons process such

information on behalf of Google. These data are never combined with the data provided by the User and are only material for statistical analysis and mechanisms for correcting system errors;

2.2. As a result of the use of other internet technologies, the User's personal data may be shared with entities with which the Administrator cooperates, e.g. with Facebook, Instagram and others. The Administrator will transfer this data only if the User agrees on the Website to transfer his Personal Data for marketing purposes to entities cooperating with the Administrator.

V. Changes to the Privacy Policy

The Personal Data Administrator declares that this Privacy Policy is verified on an ongoing basis and, if necessary, updated. The current version of the Privacy Policy is effective from June 28, 2021.

According to the needs, the Administrator may change and supplement the Privacy Policy. Users will be informed about any changes or additions on the Website.