

## Qwey Spółka z Ograniczoną Odpowiedzialnością (Limited Liability Company) **Privacy Policy**

Thank you for your interest in cooperation with Qwey sp. z o.o. (*limited liability company*) with its registered office in Warsaw. When using our services, including the website, we may collect data necessary to implement the cooperation, perform the tasks entrusted to us, as well as create and improve the tools offered. At the same time, we want to assure you that the protection of the privacy and personal data of our customers is our highest priority. Detailed and up-to-date information on the processing of personal data can be found in this privacy policy (hereinafter: "**Policy**").

The Policy describes the principles of collecting, using and storing personal data and informs you about your rights in this regard.

- I. **Data Controller:** Qwey sp. z o.o. (*limited liability company*) with its registered office in Warsaw at 4/28 11 Listopada Str., 03-435 Warsaw, entered into the register of entrepreneurs of the National Court Register under KRS number 0001063358, registration files of which are kept by the District Court for the capital city of Warsaw in Warsaw, 14th Commercial Division of the National Court Register, NIP (*Tax Identification Number*): 1133112141, REGON (*Statistical Number*): 526674091, share capital amounting to PLN 5,000 – the entity providing the Policy and at the same time the controller of personal data to which the Policy applies (hereinafter: "**Qwey**" or "**Data Controller**"). Personal data collected by the Data Controller are processed in accordance with the principles set out in the provisions on the protection of personal data, in particular in 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 (hereinafter: "**GDPR**").
- II. **Personal data:** means any information relating to an identified or identifiable natural person (hereinafter "**Data**"); an identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name and surname, identification number, location data, internet identifier or one or more specific physical, physiological, genetic, mental factors, the economic, cultural or social identity of a natural person.
- III. **Data Subject:** any natural person whose personal data is processed by the Data Controller.
- IV. **Processor:** means a natural or legal person, public authority, unit or other entity that processes personal data on behalf of the personal Data Controller.
- V. **Data sources:** personal data and (if applicable) data of the company's contact persons (e.g. employees, associates who contact the Data Controller), as well as other persons whose data was provided with their knowledge and consent, the Data Controller obtained:
  - a. **directly** from the Data subject / contact persons, as part of concluding or performing the concluded agreements, which may concern the performance of specific works for Qwey or its Clients, as well as the contract under which Qwey provides certain services; during business

meetings, at industry events or by exchanging business cards - for purposes related to initiating and maintaining business contacts, as well as as part of recruitment processes;

- b. **indirectly** within Cookies or similar technologies, which are left as part of navigating the Qwey website or using online services (if applicable), including filling in and sending a contact form. The data includes, among others, name, surname, address, e-mail, telephone number, browser type (user-agent), device data, including IP number.

**VI. Contact regarding personal data:** any requests or questions related to the implementation of the rights of the Data Subject can be sent to the e-mail address: [hello@qwey.eu](mailto:hello@qwey.eu) or to the correspondence address: Qwey sp. z o.o., 4/28 11 Listopada Str., 03-435 Warsaw.

## VII. Purposes and legal grounds for processing:

Purposes:	Legal grounds:
Performance of the agreement with Qwey or activities aimed at its conclusion, e.g. contact with customer, correspondence, preparation of an offer or a quote, etc.	Art. 6 sec. 1 letter b) of GDPR (processing for the performance of the agreement)
Statistical measurements.	Art. 6 sec. 1 letter b) of GDPR (processing for the performance of the agreement) or, if the measurements are not necessary for the performance of the agreement Art. 6 sec. 1 letter f) of GDPR (legitimate interest of the Data Controller)
Qwey's own marketing, including online marketing, in particular within the framework of the presentation of Qwey's promotional materials and its achievements at various events, as well as on websites or presentations sent to Customers.	Art. 6 sec. 1 letter f) of GDPR (legitimate interest of the Data Controller)
Newsletters.	Art. 6 sec. 1 letter b) of GDPR (processing for the performance of the agreement) Art. 6 sec. 1 letter f) of GDPR (legitimate interest of the Data Controller)
External marketing (third party marketing).	Art. 6 sec. 1 letter a) of GDPR (consent of the Data Subject)
Establishing and maintaining business relationships and informing about news from Qwey.	Art. 6 sec. 1 letter f) of GDPR (legitimate interest of the Data Controller)
Recruitment process: analysis of the candidate's profile, organization of a recruitment meeting and other activities potentially aimed at employment or starting cooperation. Based on a separate consent - also for the purposes of future recruitment processes.	Art. 6 sec. 1 letter a) of GDPR (consent of the Data Subject) Art. 6 sec. 1 lit. c) of GDPR (processing necessary to meet the legal obligations imposed on the Data Controller), including in connection with art. 22 <sup>1</sup> paragraph 1 of Labor Code Art. 6 sec. 1 letter f) of GDPR (legitimate interest of the Data Controller)
Tax, accounting and HR purposes, counteracting fraud and money laundering and other purposes resulting from the legal obligations of the Controller.	Art. 6 sec. 1 lit. c) of GDPR (processing necessary to meet the legal obligations imposed on the Data Controller)

*Table 1 Purposes and legal grounds for processing*

**VIII. Retention period:** The Data Controller processes the Data only as long as it is necessary. After achieving the goal, the Data will be deleted in accordance with the Data Controller's policy regarding retention, unless the law requires the Data Controller to keep them. Depending on the legal basis for processing, the Data may be processed for the following time:

- if the Data is necessary for the performance of the agreement - for the duration of the agreement and until the claims related to it expire,



- when the basis for data processing is the legitimate interest of the Data Controller - until an effective objection is made,
- if the Data is processed for tax, accounting, HR and anti-money laundering purposes - to the extent and for a period compliant with the applicable law,
- when the basis for data processing is consent - until its withdrawal, and - in the case of consent to the processing of data for the purposes of future recruitment - no longer than 2 years as of the consent.

**IX. Voluntary provision of Data:** providing Data is voluntary, but their provision may be a necessary condition for establishing and implementing cooperation, using services, tools or functionalities provided by Qwey (e.g. contact form).

**X. Recipients:** The Data Controller may transfer the Data to other trusted processors, whom it entrusted certain activities, so as to provide the services as best as possible. In particular to:

- entities related directly or indirectly to the Data Controller,
- external service providers (e.g. IT, postal, courier services),
- entities providing accounting, legal, HR and promotional services to Qwey,
- administration bodies and courts,
- other entities to which the Data Controller entrusted the processing of personal data on the basis of an agreement.

Data may be transferred to competent state authorities only if the Data Controller has a legal obligation under Article 6 paragraph 1 letter c) of GDPR, and only to the narrowest possible extent.

**XI. Data Subject Rights:** Data subjects have the following rights:

- the right to information on the processing of personal data, including, in particular, the purposes and legal grounds for processing, the scope of the Data held, entities to which they are disclosed and the planned date of their removal,
- the right to obtain a copy of the Data,
- the right to rectify - the Data Controller is obliged to remove inconsistencies or errors in the processed personal data and supplement them if they are incomplete,
- the right to limit processing - in the event of such a request, the Data Controller ceases to perform operations on personal data - with the exception of operations for which the data subject has consented - and their storage, in accordance with the adopted retention rules or until the reasons for limiting the processing of Data cease to exist (e.g. a decision of the supervisory authority will be issued authorizing further data processing),
- the right to transfer Data - on this basis - to the extent that the Data is processed in connection with the concluded contract or consent - the Data Controller issues the Data provided by the data subject in a format that can be read by a computer. It is also possible to request that the Data be sent to another entity - provided, however, that there are technical possibilities in this regard,
- the right to object to the processing of Data for marketing purposes at any time, without the need to justify such objection,
- the right to object to other purposes of personal data processing, which takes place on the basis of the legitimate interest of the Data Controller. The objection in this respect should contain a justification,
- the right to withdraw consent - if the Data is processed on the basis of consent, the Data Subject to which they relate has the right to withdraw it at any time, which does not affect the lawfulness of the processing carried out before the consent is withdrawn,
- the right to delete Data the processing of which is no longer necessary to achieve any of the purposes for which they were collected,



- the right to lodge a complaint - if it is found that the Data processing violates the provisions of the GDPR or other provisions on the protection of personal data, the Data Subject may submit a complaint to the President of the Personal Data Protection Office ([www.uodo.gov.pl](http://www.uodo.gov.pl)) or to a local the data protection authority of his/hers country of residence.

**XII. Data transfer to third countries (outside the EEA):** Qwey does not assume the transfer of Data to third countries, i.e. those located outside the EEA (European Economic Area). However, if this were to happen, all requirements resulting from the provisions of applicable law will be met. In the event that the transfer takes place to an entity located in a third country that does not provide an adequate level of protection, the Data Controller applies protection measures, such as standard contractual clauses approved by the European Commission.

**XIII. No automated decision-making:** as part of marketing activities and activities related to the improvement of services, the Data Controller may analyze Data in IT systems using various filters and tools. Such activities may be performed by the Data Controller based on its legitimate interest (legal basis: Article 6 sec. 1 letter f) of the GDPR), consisting in searching and grouping categories of people in order to determine what advertising messages may be of interest, as well as to improve the Data Controller's services. Based on the results of the activities described above, the Data Controller does not make any decisions with regard to the Data (subject) in an automated manner.

**XIV. Information on „Cookies“:** In order to ensure the proper functioning of Qwey services within the Qwey website, the Data Controller performs the functions of obtaining information about users and their behavior by saving so-called Cookies in end devices. Cookies are text files that are stored by the server on a computer or mobile device. Only the server that created them has access to Cookies. The text constituting the content of Cookies often contains identifiers, page names, as well as numbers and characters. Cookies are unique to the browsers or mobile applications used by the user and allow websites to store various data, including user preferences. Like many other Internet service providers, Qwey uses Cookies to improve the user experience (UX). Session (temporary) Cookies are deleted after each visit, and permanent Cookies - remain for many visits. Cookies allow websites to remember user settings such as language, font size on the user's computer or mobile device and other browser preferences. This means that the user does not have to set their preferences anew each time. Therefore, if the user does not use Cookies, websites will treat them as a new user on each visit. Cookies can be managed and deleted at your own discretion. You can delete all Cookies saved on the user's device, and most web browsers allow you to block Cookies. However, in such a case, it will be necessary to adjust user settings each time you visit the Data Controller's website. You can learn how to manage Cookies in the browser settings or on its dedicated website.

**XV. Changes/Information update:** The Policy constitutes current information on Data processing, and its content may change so as to be consistent with the actual principles of Data processing. The current Policy, together with information on the date of the last update, is available on the website <https://qwey.eu/> and Qwey recommends that you review it regularly.

