

## CLOOBES PRIVACY POLICY

### INFORMATION ABOUT PERSONAL DATA PROCESSING IN ACCORDANCE WITH GDPR

Below you will find information on how we process personal data for particular purposes. If you are redirected to this information from another website, please be aware that the information you were provided on the other website may be more accurate in your situation and prevails in case of discrepancies with the following:

#### **Personal data provided via Contact formular**

If you provide us with your personal data via “Contact” tab, please be informed that:

**Data controller:** The data controller of your personal data is:

- if you have your place of residence outside of Poland - Cloobeas UK LTD with its seat at: 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ,
- if you have your place of residence in Poland - Cloobeas sp. z o.o. with its registered seat at ul. Niedźwiedzia 6, 02-737 Warsaw, Poland.

The data controller will be hereinafter referred to as ‘Cloo bees’.

**Purposes of processing:** Your personal data will be processed for contact purposes.

**Legal basis for processing:** The legal basis for processing is art. 6 point 1 letter f of the General data protection regulation (GDPR), i.e. justified interest of the data controller which is contact with you and answering your requests.

**The term of processing:** Your personal data will be processed as long as it is necessary to give answer to your request, maintain contact and for the period of limitation of your potential claims relating to the correspondence.

**Personal data recipients:** Your personal data might be processed by persons cooperating with Cloobeas on B2B basis, IT services providers cooperating with Cloobeas, as well as other entities from Cloobeas capital group on a need-to-know basis.

**Transfer of personal data to third countries:** Due to the use of IT cloud services, your personal data might be transferred to third countries (outside of EEA). The transfer is authorized by the use of Standard Contractual Clauses approved by the European Commission ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)), as may be amended over time.

**Your rights:** You have the right to request from us access to and rectification or erasure of personal data or restriction of processing and the right to data portability, as well as the right to object to processing – in accordance with the provisions of GDPR.

**Complaint:** You have the right to lodge complaint with the data protection supervisory authority if you believe that the processing of your personal data infringes the provisions of GDPR.

**Freedom of providing data:** Providing personal data is voluntary but not providing personal data may make it more difficult or impossible to contact or to commence or continue cooperation with Cloobeas.

#### **Personal data provided for recruitment purposes – for candidates**

**Data controller:** The data controller of your personal data is:

- Cloobeas sp. z o.o. with its registered seat at ul. Niedźwiedzia 6, 02-737 Warsaw, Poland or
- Cloobeas UK LTD with its seat at: 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ or
- Cloobeas India Private Ltd., 343-B, PKT A-6, Block A, Paschim Vihar, Delhi, West Delhi, Delhi, India,

depending on which entity you have applied to. The data controller will be hereinafter referred to as ‘Cloo bees’.

**The purpose and the legal basis for processing:** Your personal data will be processed for recruitment purposes in connection with the current vacancy on the basis of art. 6 point 1 letter b of the General data protection regulation (actions taken on your demand before concluding a contract). If you additionally grant your consent for personal data processing for recruitment purposes in the future, your data will be processed on the basis of art. 6 point 1 letter a (consent). If you are a candidate from an agency, the legal basis for the processing of your personal data will be art. 6 point 1 letter f GDPR, i.e. our legitimate interest in performing the process.

**The term of processing:** If you apply for a current vacancy, your personal data will be processed until the vacancy is filled. If you grant consent for processing during recruitment processes in the future, your personal data will be processed until you withhold your consent or until you use other equivalent legal mean, e.g. you demand your data to be deleted.

**Scope of data:** We process the personal data you provide to us. We may also supply such information with publicly available information, e.g. from LinkedIn. If you are a candidate from the agency, your personal data we receive is most of the time your name, surname, experience and skills.

**Personal data recipients:** Your personal data might be processed by persons cooperating with Cloobees on B2B basis, IT services providers cooperating with Cloobees, as well as other entities from Cloobees capital group on a need-to-know basis. If you are a candidate from an agency, we will also share the result of the recruitment process and main reasons for our decision with the agency.

**Transfer of personal data to third countries:** Due to the use of IT cloud services, your personal data might be transferred to third countries (outside of EEA). The transfer is authorized by the use of Standard Contractual Clauses approved by the European Commission ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)), as may be amended over time.

**Your rights:** You have the right to request from us access to and rectification or erasure of personal data or restriction of processing and the right to data portability, as well as the right to object to processing – in accordance with the provisions of GDPR.

**Complaint:** You have the right to lodge complaint with the data protection supervisory authority if you believe that the processing of your personal data infringes the provisions of GDPR.

**Freedom of providing data:** Providing us with your personal data for recruitment purposes is voluntary but necessary for the current recruitment process.

**Free consent for recruitment in the future:** Granting consent for processing in the future is voluntary, but not giving it will make it impossible to consider you as a candidate in recruitment processes other than the current one.

**Consent for further processing:** If you wish us to store your personal information for the purposes of recruitment processes in the future, you may voluntarily express your consent e.g. by writing at [office@cloobees.com](mailto:office@cloobees.com): *I hereby grant Cloobees sp. z o.o. (Poland) and/or\* Cloobees UK LTD (UK) and/or\* Cloobees India Private Ltd. (India) consent to process the personal data I have provided - for the purposes of future recruitment processes. \*Please choose the entity or entities at your discretion.*

**Withdrawing your consent:** If you consent to your personal data being processed in future recruitment processes, you have the right to withdraw your consent at any time. To withdraw your consent please contact us at [office@cloobees.com](mailto:office@cloobees.com).

#### **Personal data of business contacts – collected directly from the individual**

**Data controller:** The data controller of your personal data is:

- if you have your place of residence outside of Poland - Cloobees UK LTD with its seat at: 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ, unless you contacted directly Cloobees sp. z o.o.,
- if you have your place of residence in Poland or if you contacted directly Cloobees sp. z o.o. - Cloobees sp. z o.o. with its registered seat at ul. Niedźwiedzia 6, 02-737 Warsaw, Poland.

The data controller will be hereinafter referred to as 'Cloobees'.

**The purpose and the legal basis for processing:** Your personal data are being processed for marketing contact purposes on the basis of legitimate interest (art. 6 point 1 letter f of the General data protection regulation), which is contact with (potential) clients' representatives.

**The term of processing:** Your data will be processed for 5 years from the moment of their introduction into our base.

**Personal data recipients:** Your personal data might be processed by persons cooperating with Cloobees on B2B basis, IT services providers cooperating with Cloobees, as well as other entities from Cloobees capital group on a need-to-know basis.

**Transfer of personal data to third countries:** Due to the use of IT cloud services, your personal data might be transferred to third countries (outside of EEA). The transfer is authorized by the use of Standard Contractual Clauses approved by the European Commission ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)), as may be amended over time.

**Your rights:** You have the right to request from us access to and rectification or erasure of personal data or restriction of processing and the right to data portability, as well as the right to object to processing – in accordance with the provisions of GDPR.

**Complaint:** You have the right to lodge complaint with the data protection supervisory authority if you believe that the processing of your personal data infringes the provisions of GDPR.

**Freedom of providing data:** Providing us with your personal data for recruitment purposes is voluntary but might be necessary to maintain business relation.

#### **Personal data of business contacts – if not collected indirectly**

**Data controller:** The data controller of your personal data is:

- if you have your place of residence outside of Poland - Cloobees UK LTD with its seat at: 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ, unless you contacted directly Cloobees sp. z o.o.,
- if you have your place of residence in Poland or if you contacted directly Cloobees sp. z o.o. - Cloobees sp. z o.o. with its registered seat at ul. Niedźwiedzia 6, 02-737 Warsaw, Poland ('Cloobees').

The data controller will be hereinafter referred to as 'Cloobees'.

**The purpose and the legal basis for processing:** Your personal data are being processed for marketing contact purposes on the basis of legitimate interest (art. 6 point 1 letter f of the General data protection regulation), which is contact with (potential) clients' representatives.

**The term of processing:** Your data will be processed for 5 years from the moment of their introduction into our base, unless we still cooperate.

**Source of personal data:** If your personal data are being processed in our databases. This means you are our client's representative, we have previously met at a conference, shared business cards, corresponded via LinkedIn/Xing, we have found your contact details on a publicly available website or you have asked about our offer.

**Scope of personal data:** The scope of personal data is name and surname, position, e-mail address and/or link to your LinkedIn/Xing account.

**Personal data recipients:** Your personal data might be processed by persons cooperating with Cloobees on B2B basis, IT services providers cooperating with Cloobees, as well as other entities from Cloobees capital group on a need-to-know basis.

**Transfer of personal data to third countries:** Due to the use of IT cloud services, your personal data might be transferred to third countries (outside of EEA). The transfer is authorized by the use of Standard Contractual Clauses approved by the European Commission ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)), as may be amended over time.

**Your rights:** You have the right to request from us access to and rectification or erasure of personal data or restriction of processing and the right to data portability, as well as the right to object to processing – in accordance with the provisions of GDPR.

**Complaint:** You have the right to lodge complaint with the data protection supervisory authority if you believe that the processing of your personal data infringes the provisions of GDPR.

#### **Personal data of employees**

**Data controller:** The data controller of your personal data is:

- Cloobees sp. z o.o. with its registered seat at ul. Niedźwiedzia 6, 02-737 Warsaw, Poland ('Cloobees') or
- Cloobees UK LTD with its seat at: 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ or
- Cloobees India Private Ltd., 343-B, PKT A-6, Block A, Paschim Vihar, Delhi, West Delhi, Delhi, India,

depending on the entity by which you are employed. The data controller will be hereinafter referred to as 'Cloobees'.

**The purpose and the legal basis for processing:** Your personal data are being processed for employment purposes

- If you are employed by Cloobees sp. z o.o. - on the basis of appropriate provisions of law, especially art. 22[1] and art. 94 point 9a and 9b of the Polish Labour Code;

- If you are employed in other entity – on the basis of art. 6.1.b GDPR (necessity to perform employment contract) or other appropriate provisions of law.

**The term of processing:** Your data will be throughout the term of employment and for a period required by the relevant laws (which currently is e.g. 10 years in Poland and in most cases up to 6 years in the UK) afterwards.

**Personal data recipients:** Your personal data might be processed by persons cooperating with Cloobees on B2B basis, IT services providers cooperating with Cloobees, other entities from Cloobees capital group on a need-to-know basis, as well as our clients – to the extent if you are engaged in services rendered for them. Other recipients of your personal data may be tax authorities, social insurance institutions and medical institutions.

**Transfer of personal data to third countries:** Due to the use of IT cloud services, your personal data might be transferred to third countries (outside of EEA). The transfer is authorized by the use of Standard Contractual Clauses approved by the European Commission ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)), as may be amended over time.

**Your rights:** You have the right to request from us access to and rectification or erasure of personal data or restriction of processing and the right to data portability, as well as the right to object to processing – in accordance with the provisions of GDPR.

**Complaint:** You have the right to lodge complaint with the data protection supervisory authority if you believe that the processing of your personal data infringes the provisions of GDPR.

**Freedom of providing data:** Providing us with your personal data for employment purposes is voluntary however necessary to start and maintain employment relation.

#### **Personal data of B2B contractors**

**Data controller:** The data controller of your personal data is:

- Cloobees sp. z o.o. with its registered seat at ul. Niedźwiedzia 6, 02-737 Warsaw, Poland ('Cloobees') or
- Cloobees UK LTD with its seat at: 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ or
- Cloobees India Private Ltd., 343-B, PKT A-6, Block A, Paschim Vihar, Delhi, West Delhi, Delhi, India,

depending on the entity which you are cooperating with. The data controller will be hereinafter referred to as 'Cloobees'.

**The purpose and the legal basis for processing:** Your personal data will be processed for the purposes related to our cooperation and – after its cessation – for the purpose of securing legal claims and for accounting purposes. The legal basis for processing during the term of our cooperation is art. 6 point 1 letter b GDPR (performance of the agreement). After the termination of our cooperation the legal basis for processing will be art. 6 point 1 letter f GDPR, i.e. justified interest of the data controller which is securing documentation for potential legal claims and accounting purposes.

**The term of processing:** Your data will be processed throughout the term of cooperation and afterwards until the expiry of the term of limitation of claims relating to our agreement and claims related to accounting documents (e.g. invoices) issued in connection with our cooperation (usually 5 years after the end of fiscal year in Poland and 3 years in the UK).

**Personal data recipients:** Your personal data might be processed by persons cooperating with Cloobees on B2B basis, IT services providers cooperating with Cloobees, other entities from Cloobees capital group on a need-to-know basis, as well as our clients – to the extent if you are engaged in services rendered for them. Other recipients of your personal data may be tax authorities.

**Transfer of personal data to third countries:** Due to the use of IT cloud services, your personal data might be transferred to third countries (outside of EEA). The transfer is authorized by the use of Standard Contractual Clauses approved by the European Commission ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)), as may be amended over time.

**Your rights:** You have the right to request from us access to and rectification or erasure of personal data or restriction of processing and the right to data portability, as well as the right to object to processing – in accordance with the provisions of GDPR.

**Complaint:** You have the right to lodge complaint with the data protection supervisory authority if you believe that the processing of your personal data infringes the provisions of GDPR.

**Freedom of providing data:** Providing us with your personal data for cooperation purposes is voluntary, however necessary to start and maintain our cooperation.