

## PRIVACY POLICY

This privacy policy is meant to describe how we process personal data, collected in connection with the use of our website available under the address: <https://www.directio.com/>, including any landing pages using the same domain ("Website").

### **Personal data controller**

The controller of personal data collected via the Website and at the same time the Website's administrator is Directio sp. z o.o. with its registered office in Warsaw, at ul. Sienna 39, 00-121 Warszawa, Poland, entered into the register of entrepreneurs kept by the National Court Register under the register number (KRS): 0000035843 ("Directio", "we" or "our").

### **Data Protection Officer**

We have appointed a data protection officer. His contact information is provided below:

Name and surname: Krzysztof Kunowski

E-mail: [krzysztof.kunowski@directio.com](mailto:krzysztof.kunowski@directio.com)

You can contact our data protection officer in case of any inquiries or requests concerning the processing of your personal data by us.

### **Categories of personal data**

When using the Website, you may be asked to provide some of your personal information, in particular by filling out a contact form. The personal data collected via the contact form available on the Website are first name, last name, and e-mail address. Providing the above data is voluntary, but necessary to handle your inquiry. We may also collect other personal data provided by you in the content of your inquiry. Providing the data is voluntary.

If you are applying for open job positions using or filing the contact form for candidates in connection with the future recruitment processes, please read carefully our Privacy Policy for Candidates.

We may also collect your personal data when you contact us directly by phone or e-mail, in particular in connection with the services provided by us. The data collected include, in particular, name, surname, phone number, e-mail address, and other personal data provided by you. The provision of data is voluntary, but the provision of basic contact information is necessary to handle your inquiry.

In any case, remember to limit the personal data provided to a minimum. We reserve the right to delete personal data other than necessary to achieve the purpose of data processing.

### **Cookies and similar technologies**

We use cookies or similar technologies that collect certain Website usage information when you access, view, and use the Website. To learn more about this, please read carefully our Cookie Policy.

### **Purpose and basis for the processing of personal data**

We process your personal data for the following purposes:

<b>Purpose of the processing</b>	<b>Basis for the processing</b>
handling your inquiry submitted via the contact form and communicating with you in this	our legitimate interests (Article 6(1)(f) of the GDPR)

regard, including presenting you with an offer of our services	
the establishment, exercise, or defense of legal claims	our legitimate interests (Article 6(1)(f) of the GDPR)
sending you future marketing communications, promotional offers, and updates from us	your consent (Article 6(1)(a) of the GDPR)

**Period of personal data storage**

The period of processing and storage of your personal data depends on the legal basis of the processing. In any case, the data will be stored by us for the period necessary to achieve the purposes of processing.

The data processed to process your inquiry will be kept for the period necessary for its handling and communication with you in this regard.

If the basis for data processing is your consent your personal data will be processed until your consent is withdrawn.

The retention period may be extended each time by the statute of limitations for claims if the processing of your personal information is necessary for the establishment or exercise of possible claims or defense against such claims by us.

**Categories of recipients of personal data**

Depending on a given case, your personal data may be disclosed with the following categories of recipients:

- (a) Third-party service providers and advisors (including legal, financial, and technical advisors, and IT services providers). We may share your personal data to the necessary extent with our service providers and advisors to obtain their advice or assistance or who perform business operations for us or render different services to us, for example by hosting it, enabling certain features or functionality of the Website, or by providing ancillary services such as data analytics, data storage, support and maintenance or security technology. We require all our third-party service providers and advisors to respect the security of your personal data and to process it under the law. We do not allow our third-party service providers and advisors to use your personal data for their purposes and only permit them to process your personal data for specified purposes and under our instructions. We enter with third parties in relevant data processing agreements, if required by law.
- (b) Our affiliates: we operate as a global business and thus have affiliates in several countries around the world. We may provide your data to our selected affiliate if your inquiry relates to services provided by it.
- (c) Entities authorized to obtain your personal data based on applicable law, including law enforcement agencies, courts, regulators, and government authorities. We may share your personal data with these parties where it is necessary to comply with a legal obligation.
- (d) Other third parties - in case of separate consent to share such data.

**International data transfers**

Your personal data may be transferred to a third country (not a member of the EEA) only if the conditions laid down in the provisions of the law are complied with, including:

- the country that we transfer the personal data to is approved by the European Commission as providing an adequate level of protection for personal data;
- the transfer is to a recipient in the United States of America who has registered under the Data Privacy Framework;
- the recipient has entered into European Commission standard contractual clauses with us;
- the transfer is necessary for the performance of a contract between us and you or to implement pre-contractual measures taken at your request;
- the transfer is necessary for the establishment, exercise, or defense of legal claims;
- you have explicitly consented to the same.

For more information on international transfer of data, including appropriate safeguards in place, please contact us.

**Profiling. Automated decision making**

We do not use profiling or automatic decision-making concerning your personal data collected via the Website.

**Your rights**

You have certain rights regarding your personal data. These include the right to:

request access to your personal data	At any time you can find out what data we process and receive a copy of such data.
request rectification of your personal data	You have the right to request your personal data be corrected if they are inaccurate or completed if they are incomplete.
request the erasure of your personal data	You have the right to request that your personal data be deleted or removed if: <ul style="list-style-type: none"> <li>(a) they are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</li> <li>(b) they have been unlawfully processed;</li> <li>(c) the erasure of your personal data is necessary for compliance with a legal obligation.</li> </ul>
request restriction of our use of your personal data	You have the right to restrict the processing of your personal data if:

	<ul style="list-style-type: none"> <li>(a) you contest the accuracy of your personal data, for a period enabling us to verify their accuracy;</li> <li>(b) the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead;</li> <li>(c) we no longer need your personal data for the processing, but you require them for the establishment, exercise, or defense of legal claims;</li> <li>(d) you have objected to the processing of your personal data pending the verification of whether our legitimate grounds override yours.</li> </ul>
<p>object to the processing of your personal data</p>	<p>You have the right to object to the processing of your personal data based on our legitimate interests.</p> <p>We will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or we process your personal data for the establishment, exercise, or defense of legal claims.</p> <p>Where your personal data are processed for direct marketing purposes, i.e., to provide you with marketing communication from us, you have the right to object at any time to the processing of your personal data for such purpose. In such a case, we will no longer process your personal data for such purpose.</p>
<p>data portability (if the basis for data processing is your consent)</p>	<p>You have the right to receive your personal data, which you have provided to us, in a structured, commonly used, electronic format.</p> <p>Moreover, you have the right to transmit those data to another controller or request to have the personal data transmitted directly from us to another controller, where technically feasible.</p>
<p>withdraw your consent</p>	<p>You have the right to withdraw your consent for the data processing at any time.</p>

(if the basis for data processing is your consent)	The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
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We will contact you if any additional information from you will be needed to honor your requests.

Please note that we may ask you to verify your identity before responding to such requests.

#### **Right to complain with the supervisory authority**

If you believe that your personal data is being processed unlawfully you can complain with a supervisory authority, in Poland: the President of the Personal Data Protection Office (Personal Data Protection Office - ul. Stawki 2, 00-193 Warsaw, Poland).

#### **Links**

The Website may provide links to third-party websites or resources. We provide such links and references to you only as a convenience. If you click a third-party link, you will be directed to that third-party's site. We strongly advise you to review the privacy policy of every site you visit.

#### **Changes to this Privacy Policy**

We reserve the right to amend this Privacy Policy at any time at our sole discretion, for material reasons, including legal, security, technical, or commercial reasons.

If you continue to use the Website after the amendments to this Privacy Policy come into force, you thereby accept the new terms of this Privacy Policy.

#### **Contact**

Any inquiries or requests concerning the processing of your data by us you may address to our data protection officer (contact details provided above) or in writing to the following address: Directio Sp. z o.o., ul. Sienna 39, 00-121 Warszawa, Poland.

If you wish to report any abuse of this policy you can also contact us at the following e-mail:

[abuse@directio.com](mailto:abuse@directio.com).