

## Recruitment Privacy Notice

Aptitude Software (Poland) Sp. z o.o. is committed to protecting the security and privacy of your personal data.

This Recruitment Privacy Notice describes how we collect and use personal information about you during our recruitment process in accordance with applicable data protection law, including the General Data Protection Regulation (EU) 2016/679, as transposed into the national laws of Poland (“GDPR”).

**1. Data Controller:** In the context of the GDPR the data controller (“Controller”) of your personal data is:

Aptitude Software (Poland) Sp. z o.o., Muchoborksa 6, 54-424 Wrocław.

2. In matters related to the processing of your personal data by the Controller please contact: [dataprotection-office@aptitudesoftware.com](mailto:dataprotection-office@aptitudesoftware.com)

**3. Personal Data collected:** The personal data you provide in your CV, or the Controller asks you to fill out in your job application, including:

- first name(s) and surname;
- date of birth;
- contact information;
- education;
- professional qualifications;
- history of previous employment.

**4. Data Collection Purpose:** Your personal data will be processed solely to carry out our recruitment process. This process may include the following:

- Verification of personal data;
- Reference checks;
- Assessment of qualifications and skills needed to perform the job you are applying for;
- Communication during the recruitment process; and
- Fulfilling our legal regulations.

Your personal data will not be subject to profiling or automated decision-making.

**5. Lawful Basis for Processing:** Processing your personal data for the purpose of the recruitment process is covered by:

- Article 6(1)(b) GDPR: the processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract. In this case, the contract would be a contract of employment, if you are successful in your application.

- Article 6(1)(c) GDPR: for the compliance with a legal obligation (e.g., verification of immigration status/legal right to work in Poland).
- Article 6(1)(f) GDPR: the processing is necessary for the purposes of the legitimate interests pursued by the Controller. In this instance, the legitimate interest of the Controller is to carry out adequate checks on candidates to assess their suitability to have access to sensitive information, assets and equipment as potential employees. The risk to candidates arising from these checks is that if adverse information is discovered during the recruitment process, the Controller may not provide or confirm an offer of employment to the candidate. It is therefore in your best interests to provide full disclosure during pre-employment assurance processes, so any risks you present as a potential employee can be properly assessed.

**5. Consent for future processing:** The Controller may also process your personal data for the purposes of future recruitment processes, subject to your consent (Article 6(1)(a) GDPR).

**6. Your rights in relation to your personal data:** You have the right to request access to the personal information the Controller holds about you. This is commonly known as a Data Subject Access Request (SAR). This enables you to receive a copy of the personal information the Controller holds about you and check that the Controller is lawfully processing it. If you wish to make a subject access request, please contact: [dataprotection-office@aptitudesoftware.com](mailto:dataprotection-office@aptitudesoftware.com). In certain circumstances, you have the right to object to, and restrict the use of your personal data, or to ask to have your personal data deleted or corrected. You also have the right to explicitly withdraw your right to consent to the processing of personal data (where you have explicitly consented to the use of personal data and that is the lawful basis for processing it).

**7. Data Sharing and Data Processors:** Access to your personal data is limited to the Controller's (or its related companies) employees and third parties who participate in the recruitment process. These third parties are known as "Data Processors". Data Processors process all personal data at the Controller's request and on the Controller's instructions and have signed data processing contracts to secure and protect your right to data privacy. A list of Data Processors is available upon request.

**9. Storing your Personal Information:** Your personal data is stored within the EEA and access to it is secured within the highest level of standards and practices. Personal data may be processed by employees of the Controller's related companies outside the EEA if they are participating in the recruitment process and only if there are sufficient safeguards in place (Adequacy Decision or Standard Contractual Clauses) to protect the transfer of personal data.

**8. Personal Data Retention Period:** Your personal data will be retained for up to twelve (12) months until the selection for the open position you have applied for has closed (to include the probation period of the successful candidate). However, you can consent to the Controller keeping your personal information for a further twelve (12) months to update you on new job opportunities.

**10. Complaints:** You have the right to lodge a complaint against the processing of your data by the Controller to the data protection Supervisory Authority. You can contact the Supervisory Authority at: Personal Data Protection Office, ul. Stawki 2, 00-193 Warszawa, Poland [www.uodo.gov.pl](http://www.uodo.gov.pl)