

Privacy Policy DEVO SP. Z O.O.

**with registered office at Meblowa 29
Street, 18-400 Lomza**

in connection with the performance of the information obligations under Article 13 of 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

Information clause for persons submitting job offers as part of recruitment procedures for vacant posts

DATA CONTROLLER:

The administrator of your personal data is DEVO SP. Z O.O. with its registered office at Meblowa 29 Street, 18-400 Łomża.

PURPOSES OF PROCESSING, LEGAL BASIS:

Your personal data is processed for the following purposes:

- 1) conducting the current recruitment procedure with the selection of the offer on the basis of:
 - Article 6(1)(b) of the RODO* (processing is necessary in order to take steps at the request of the data subject prior to entering into a contract) with regard to the data covered by Article 221 § 1 and § 2 of the Labour Code
 - Article 6(1)(a) of the RODO* (processing is based on consent) as regards transfer of other data by the candidate
 - Article 9(2)(a) of the RODO* (processing takes place on the basis of explicitly expressed consent in a separately submitted declaration) with regard to the transfer of personal data falling within the special categories of personal data defined in Article 9(1) of the RODO* (including data on health status),
- 2) To carry out future recruitment on the basis of:
 - Article 6(1)(a) of the RODO* (processing takes place on the basis of the consent given in a separately submitted declaration) and Article 9(2)(a) of the RODO* (processing takes place on the basis of the consent expressly given in a separately submitted declaration),

DATA RECIPIENTS:

Your data will be forwarded (where applicable, entrusted) to postal service providers, providers of IT services and software to support company management, providers of email hosting services, medical entities in the scope of referring a job candidate to an initial medical examination.

PROCESSING TIME:

Your personal data, depending on the purpose, will be processed for the following period:

- 1) in order to carry out the current recruitment procedure in the scope of data covered by Article 221 § 1 and § 2 of the Labour Code - 3 months after the recruitment ends;
- 2) in order to carry out the current recruitment procedure with regard to other data processed on the basis of the consent given - until the withdrawal of consent granted, however, no longer than 3 months after the end of the recruitment, even if consent is not withdrawn,
- 3) for the purpose of conducting further recruitments - until the withdrawal of consent, but no longer than 12 months from the moment of granting consent, even if consent is not withdrawn,

YOUR RIGHTS:

Please be advised that you have the following rights under the RODO*:

- The right to request access to your personal data,
- The right to request the rectification of your personal data,
- The right to request the erasure or restriction of the processing of your personal data,
- the right to withdraw consent to the processing of your personal data at any time without affecting the lawfulness of the processing

made on the basis of consent before it was withdrawn (i.e. on the basis of Article 6(1)(a) of the RODO* and Article 9(2)(a) of the RODO*),

- The right to have your personal data transferred to another controller (data processed on the basis of Article 6(1)(a) RODO*; Article 9(2)(a) RODO* and Article 6(1)(b) RODO*),
- The right to object to the processing of your personal data (data processed on the basis of the legitimate interest of the controller, i.e. Article 6(1)(f) RODO*),
- The right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

In order to withdraw your consent to the processing of personal data, please contact the Administrator whose details are provided in this information clause. Consent can be withdrawn personally in the Administrator's office, by post or by sending a request to the e-mail address.

OBLIGATION TO PROVIDE DATA:

Providing the personal data referred to in Article 221 of the Labour Code is voluntary, but necessary in order to be able to participate in the recruitment procedure, and failure to provide such data may result in a job offer not being taken into consideration. Providing your other data on the basis of your consent is voluntary and has no impact on the current recruitment procedure.

*** We refer to:** 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

Information clause for persons with whom DEVO SP. Z O.O. establishes business contacts

DATA CONTROLLER:

The administrator of your personal data is DEVO SP. Z O.O. with its registered office at Meblowa 29 Street, 18-400 Łomża.

PURPOSES OF PROCESSING, LEGAL BASIS:

Your personal data is processed for the following purposes:

- 1) Establish business relationships including submitting bids and requests for quotations, requesting contract estimates, service pricing and a variety of other activities to establish business relationship on a:
 - Article 6(1)(f) RODO* (processing is necessary for the purposes of pursuing the administrator's legitimate interests consisting in choosing the most advantageous offer for the supply of services and goods, taking care of the company's finances),
- 2) Defending against claims and asserting claims under:
 - Article 6(1)(f) RODO* (processing is necessary for the purposes of pursuing the legitimate interests of the controller in looking after its interests).

DATA RECIPIENTS:

We will transfer (where appropriate entrust) personal data to postal service providers, courier service providers, service providers and any IT software that supports business management, email hosting service providers.

PROCESSING TIME:

Your personal data will be processed for the following period:

- 1) for the purpose of establishing a business relationship - until the business relationship is terminated,
- 2) for the purpose of defence against claims and enforcement of claims - 6 years from the end of the relationship.

YOUR RIGHTS:

Please be advised that you have the following rights under the RODO*:

- The right to request access to your personal data,
- The right to request the rectification of your personal data,
- The right to request the erasure or restriction of the processing of your personal data,
- The right to object to the processing of your personal data,
- The right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

OBLIGATION TO PROVIDE DATA:

Providing personal data is voluntary, however, it is necessary in order to establish business relations and the consequence of not providing personal data will be the impossibility of fulfilling the above objectives, including the establishment of business cooperation.

* **We refer to:** 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

Information clause for suppliers of services and goods who are natural or legal persons conducting economic activity

DATA CONTROLLER:

The administrator of your personal data is DEVO SP. Z O.O. with its registered office at Meblowa 29 Street, 18-400 Łomża.

PURPOSES OF PROCESSING, LEGAL BASIS:

Your personal data is processed for the following purposes:

- 1) The conclusion and performance of a contract for the purchase/supply of services or goods under:
 - Article 6(1)(b) RODO* (processing is necessary for the performance of a contract to which the data subject is a party).
- 2) Maintain accounting and tax records based on:
 - Article 6(1)(c) of the RODO* (processing is necessary for the purposes of complying with a legal obligation to which the controller is subject) and in connection with regulations such as the Accounting Act of 29 September 1994, the Goods and Services Tax Act of 11 March 2004 and all regulations governing the creation, determination and extinction of tax liabilities and other tax-related provisions.
- 3) Defending against claims and asserting claims under:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the legitimate interests of the controller in looking after its interests)
- 4) Reporting of complaints, possible complaints or other requests concerning cooperation on the basis of:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the controller's legitimate interests consisting in ensuring proper performance of the agreement and the quality of services or products provided under the cooperation).

DATA RECIPIENTS:

We will transfer (where applicable, entrust) your personal data to postal service providers, courier service providers, service providers and any IT software supporting business management, email hosting service providers, legal service providers, banks and other financial institutions for payment processing.

PROCESSING TIME:

Your personal data will be processed for the following period:

- 1) for the purpose of concluding and performing the contract - until the end of the contract,
- 2) in order to keep accounting and tax records 5 years from the end of the calendar year in which the tax obligation arose,
- 3) for the purpose of defence against claims and enforcement of claims - 6 years from the end of the contract,
- 4) in order to report complaints, possible complaints, requests - 1 year from the delivery of the notification in question.

YOUR RIGHTS:

Please be advised that you have the following rights under the RODO*:

- The right to request access to your personal data,

- The right to request the rectification of your personal data,
- The right to request the erasure or restriction of the processing of your personal data,
- The right to transfer your personal data to another controller - in the case of data processed on the basis of a contract, i.e. Article 6(1)(b) RODO*,
- the right to object to the processing of your personal data - in the case of data processed in order to pursue the legitimate interest of the controller, i.e. Article 6(1)(f) RODO*,
- The right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

OBLIGATION TO PROVIDE DATA:

Providing personal data is voluntary, however it is necessary in order to conclude and implement the provisions of the agreement and cooperation. If you do not provide your personal data, it will not be possible to fulfill the above purposes, including the implementation of the provisions of the concluded contract.

* **We refer to:** 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

Information clause for contractors, who are natural persons or natural persons conducting economic activity

DATA CONTROLLER:

The administrator of your personal data is DEVO SP. Z O.O. with its registered office at Meblowa 29 Street, 18-400 Łomża.

PURPOSES OF PROCESSING, LEGAL BASIS:

Your personal data is processed for the following purposes:

- 1) To enter into and perform a contract for the provision of services/supply of goods under:
 - Article 6(1)(b) RODO* (processing is necessary for the performance of a contract to which the data subject is a party).
- 2) Maintain accounting and tax records based on:
 - Article 6(1)(c) of the RODO* (processing is necessary for the purposes of complying with a legal obligation to which the controller is subject) and in connection with regulations such as the Accounting Act of 29 September 1994, the Goods and Services Tax Act of 11 March 2004 and all regulations governing the creation, determination and extinction of tax liabilities and other tax-related provisions.
- 3) Defending against claims and asserting claims under:
 - Article 6(1)(f) RODO* (processing is necessary for the purposes of pursuing the legitimate interests of the controller in looking after its interests).
- 4) Consideration of complaints, possible complaints or other requests for cooperation on the basis of:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the controller's legitimate interests consisting in ensuring proper performance of the agreement and the quality of services or products provided under the cooperation).
- 5) Collection of debts on the basis of:
 - Article 6(1)(f) RODO* (processing is necessary for the purpose of pursuing the legitimate interests of the controller in looking after the company's finances).

DATA RECIPIENTS:

We will transfer (where applicable, entrust) your personal data to postal service providers, courier service providers, service providers and any IT software supporting business management, email hosting service providers, legal service providers, banks and other financial institutions for payment processing.

PROCESSING TIME:

Your personal data will be processed for the following period:

- 1) for the purpose of concluding and performing the contract - until the end of the contract,
- 2) in order to keep accounting and tax records - 5 years from the end of the calendar year in which the tax obligation arose,
- 3) for the purpose of defence against claims and enforcement of claims - 6 years from the end of the contract,
- 4) processing complaints, possible complaints - year from service of the notification in question,
- 5) in order to collect debts - until full settlement of payments.

YOUR RIGHTS:

Please be advised that you have the following rights under the RODO*:

- The right to request access to your personal data,
- The right to request the rectification of your personal data,
- The right to request the erasure or restriction of the processing of your personal data,
- The right to transfer your personal data to another controller - in the case of data processed on the basis of a contract, i.e. Article 6(1)(b) RODO*,
- the right to object to the processing of your personal data - in the case of data processed in order to pursue the legitimate interest of the controller, i.e. Article 6(1)(f) RODO*,
- The right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

OBLIGATION TO PROVIDE DATA:

Providing personal data is voluntary, however, it is necessary in order to conclude and perform the provisions of the contract. If you do not provide personal data, it will not be possible to fulfill the above purposes, i.e. to establish cooperation, as well as to conclude and perform the contract and supply services or products.

* **We refer to:** 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

Information clause for persons representing (employees, collaborators) contractors and suppliers

DATA CONTROLLER:

The administrator of your personal data is DEVO SP. Z O.O. with the registered office at Meblowa 29 Street, 18-400 Łomża

PURPOSES OF PROCESSING, LEGAL BASIS:

Your personal data is processed for the following purposes:

- 1) Perform activities necessary to execute the contract under:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the legitimate interests of the controller consisting in carrying out activities aimed at proper performance of the contract).
- 2) Maintain accounting and tax records based on:
 - Article 6(1)(c) of the RODO* (processing is necessary for the purposes of complying with a legal obligation to which the controller is subject) and in connection with regulations such as the Accounting Act of 29 September 1994, the Goods and Services Tax Act of 11 March 2004 and all regulations governing the creation, determination and extinction of tax liabilities and other tax-related provisions.
- 3) Defending against claims and asserting claims under:
 - Article 6(1)(f) RODO* (processing is necessary for the purposes of pursuing the legitimate interests of the controller in looking after its interests).
- 4) Submitting and processing of complaints, possible claims or other requests concerning cooperation on the basis of:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the legitimate interests of the controller consisting in ensuring proper performance of the contract and the quality of the services or products provided under the cooperation).
- 5) Collection of debts on the basis of:
 - Article 6(1)(f) RODO* (processing is necessary for the purpose of pursuing the legitimate interests of the controller in looking after the company's finances).

DATA RECIPIENTS:

We will transfer (where appropriate entrust) personal data to postal service providers, courier service providers, service providers and any IT software that supports business management, email hosting service providers, legal service providers.

PROCESSING TIME:

Your personal data will be processed for the following period:

- 1) in order to perform actions necessary for the execution of the contract - until the end of the contract or filing an effective objection,
- 2) in order to keep accounting and tax records - 5 years from the end of the calendar year in which the tax obligation arose,
- 3) for the purpose of defence against claims and enforcement of claims - 6 years from the end of the contract,
- 4) in order to consider and report complaints, possible complaints - 1 year from the delivery of the said notification,
- 5) in order to collect debts - until full settlement of payments.

YOUR RIGHTS:

Please be advised that you have the following rights under the RODO*:

- The right to request access to your personal data,
- The right to request the rectification of your personal data,
- The right to request the erasure or restriction of the processing of your personal data,
- the right to object to the processing of your personal data - in the case of data processed in order to pursue the legitimate interest of the controller, i.e. Article 6(1)(f) RODO*,
- The right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

OBLIGATION TO PROVIDE DATA:

Providing personal data is voluntary, but necessary to conclude and perform the contract. If you do not provide personal data, it will not be possible to fulfill the above objectives, i.e. to establish cooperation, take action aimed at concluding a contract and conclude and perform the contract.

* **We refer to:** 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

Information clause for correspondents

DATA CONTROLLER:

The administrator of your personal data is DEVO SP. Z O.O. with its registered office at Meblowa 29 Street, 18-400 Łomża.

PURPOSES OF PROCESSING, LEGAL BASIS:

Your personal data is processed for the following purposes:

- 1) To record correspondence and respond to correspondence sent on the basis of:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the administrator's legitimate interest in ensuring quality of cooperation, responding to correspondence and dealing with any matters subject thereto).
- 2) Defending against claims and asserting claims under:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the legitimate interests of the controller, such as maintaining the good name of the company and defending its interests).

DATA RECIPIENTS:

We will transfer (where appropriate entrust) personal data to postal service providers, courier service providers, service providers and any IT software that supports business management, email hosting service providers, legal service providers.

PROCESSING TIME:

Your personal data will be processed for the following period:

- 1) in order to register the correspondence and reply to the sent correspondence - until the end of the correspondence,
- 2) in order to defend against claims and pursue claims - 6 years from the end of cooperation to which the correspondence related.

YOUR RIGHTS:

Please be advised that you have the following rights under the RODO*:

- The right to request access to your personal data;
- The right to request the rectification of your personal data;
- The right to request erasure or restriction of processing of personal data;
- The right to object to the processing of your personal data (data processed under Article 6(1)(f) of the RODO*),
- The right to lodge a complaint to the supervisory authority - the President of the Office for Personal Data Protection.

OBLIGATION TO PROVIDE DATA:

Providing personal data is voluntary, however, it is necessary in order to register incoming correspondence and to answer it. If you do not provide your personal data, it will not be possible to handle the matters which are the subject of your correspondence.

* **We refer to:** 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

Information clause for users of the <https://devo.pl/> website

DATA CONTROLLER:

The administrator of your personal data is DEVO SP. Z O.O. with its registered office at Meblowa 29 Street, 18-400 Łomża.

PURPOSES OF PROCESSING, LEGAL BASIS:

Your data is processed for:

- 1) To maintain the website and ensure its security and proper operation on the basis:
 - Article 6(1)(f) RODO* (processing is necessary for the purposes of the legitimate interests of the controller in maintaining the website),
- 2) Defending against claims and asserting claims under:
 - Article 6(1)(f) RODO* (processing is necessary for the purposes of the legitimate interests of the controller in maintaining its image and protecting its interests),
- 3) Market research into the behaviour and preferences of visitors to the website and those who are customers, including the improvement of the functioning of the website, with the results of this research being used to improve the quality of the services provided on the basis:
 - Article 6(1)(a) of the RODO* (processing takes place on the basis of consent given by the customer to the cookie technology by setting browser parameters)

DATA RECIPIENTS:

Recipients of personal data are IT service providers involved in the operation including hosting of the website.

PROCESSING TIME:

Your personal data will be processed for a period of 5 years from your last visit to the website or until you make an effective objection. Data processed on the basis of consent - until its withdrawal.

YOUR RIGHTS:

Please be advised that you have the following rights under the RODO*:

- The right to request access to your personal data,
- The right to request the rectification of your personal data,
- The right to request the erasure or restriction of the processing of your personal data,
- The right to object to the processing of your personal data,
- The right to withdraw consent to the processing of personal data,
- The right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

OBLIGATION TO PROVIDE DATA:

The provision of data is voluntary.

***Talk about:** 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

Information clause for contractors registered for social insurance

DATA CONTROLLER:

The administrator of your personal data is DEVO SP. Z O.O. with its registered office at Meblowa 29 Street, 18-400 Łomża.

PURPOSES OF PROCESSING, LEGAL BASIS:

Your personal data is processed for the following purposes:

- 1) Taking pre-contractual action on the basis of:
 - Article 6(1)(b) of the RODO* (processing is necessary for the concept of actions at the request of the data subject prior to entering into a contract).
- 2) To enter into and perform a contract of mandate on the basis of:
 - Article 6(1)(b) RODO* (processing is necessary for the performance of a contract to which the data subject is a party)
- 3) Fulfillment of a legal obligation towards public authorities regarding notification of the contractor to social insurance on the basis of:
 - Article 6(1)(c) of the RODO* (processing is necessary for the purposes of complying with a legal obligation to which the controller is subject) and in relation to regulations such as: the Act of 13 October 1998 on the social insurance system, the Act of 17 December 1998 on pensions from the Social Insurance Fund, implementing regulations on the minimum remuneration for work and the minimum hourly rate,
- 4) Maintain accounting and tax records based on:
 - Article 6(1)(c) of the RODO* (processing is necessary for the purposes of complying with a legal obligation to which the controller is subject) and in connection with regulations such as the Accounting Act of 29 September 1994, the Personal Income Tax Act of 26 July 1991 and all regulations governing the creation, determination and extinction of tax liabilities and other tax-related provisions.
- 5) Defending against claims and asserting claims under:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the legitimate interests of the controller consisting in taking care of its image and good name)
- 6) The granting and further execution of authorization to process personal data on behalf of the controller under:
 - Article 6(1)(c) of the RODO* (fulfilment of an obligation incumbent on the controller) in conjunction with Article 29 of the RODO*.
- 7) Keep records of persons authorized to process personal data on the basis:
 - Article 6(1)(f) of the RODO* (processing is necessary for the purposes of pursuing the controller's legitimate interest in maintaining the confidentiality of company information and proper organisation of work).

DATA RECIPIENTS:

Your data will be passed on (where applicable, entrusted) to postal service providers, courier service providers, service providers of all kinds

IT software supporting business management, providers of e-mail hosting services, providers of legal services, providers of hotel and other accommodation services within the scope of the contractor's posting and organisation of business trips, providers of passenger transport services, banks and other financial institutions within the scope of salary payments, providers of training services.

PROCESSING TIME:

Your personal data will be processed for the following period:

- 1) for the purpose of taking action prior to concluding a commission agreement - until the commission agreement is signed,
- 2) for the purpose of concluding and performing the contract - until the end of the contract,
- 3) fulfilling the legal obligation towards public authorities in terms of reporting the contractor to social security - 10 years from the end of the contract of mandate,
- 4) in order to keep accounting and tax records - 5 years from the end of the calendar year in which the tax obligation arose,
- 5) for the purpose of defence against claims and enforcement of claims - 6 years from the end of cooperation / contract of mandate,
- 6) for the purpose of granting and implementing an authorisation to process personal data - until the authorisation expires,
- 7) in order to keep records of persons authorized to process personal data - 6 years after the termination of authorization.

YOUR RIGHTS:

Please be advised that you have the following rights under the RODO*:

- The right to request access to your personal data,
- The right to request the rectification of your personal data,
- The right to request the erasure or restriction of the processing of your personal data,
- the right to transfer your personal data to another controller - in the case of data processed on the basis of the performance of the contract, i.e. Article 6(1)(b) of RODO*,
- the right to object to the processing of your personal data - in the case of data processed in order to pursue the legitimate interest of the controller, i.e. Article 6(1)(f) RODO*,
- The right to lodge a complaint to the supervisory authority, which is the President of the Office for Personal Data Protection.

OBLIGATION TO PROVIDE DATA:

Providing personal data is voluntary, however it is necessary in order to conclude and perform the contract of mandate. If you do not provide your personal data, it will not be possible to fulfill the above purposes, i.e. to sign and implement the contract of mandate.

* **We refer to:** 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