

## PRIVACY POLICY

### WHO ARE WE?

**DevTalents spółka z ograniczoną odpowiedzialnością (formerly United Ideas spółka z ograniczoną odpowiedzialnością)** with its registered seat in Warsaw at Mazowiecka 11 suite 49, 00-052 Warsaw, entered into the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw, XII Commercial Division of the National Court Register under KRS number: 0000372241, NIP [Tax Identification Number]: 5272643080, REGON [Statistical Number]: 142707287, further referred to as **“the Company”** is a data controller under 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 (General Data Protection Regulation further referred to as **“GDPR”**).

This privacy policy (**“Policy”**) describes how the Company and its related companies process the personal data of users collected via this website and subpages (the **“Site”**) including newsletter sign-up form, contact forms, recruitment process or via any correspondence with the Company. This Policy does not apply to websites that post different statements.

### WHAT WE COLLECT?

We may collect the following information:

- name, surname, e-mail address, phone number, name of the organisation that you are affiliated with and any other data you provide voluntary when you contact us via electronic forms or in other ways (e-mail, phone, correspondence),
- name, e-mail address, when you subscribe to our newsletter or subscribe for tutorials, exclusive articles, and updates,
- name, surname, e-mail address, phone number, organisation that you are affiliated with, professional experience, education, image, address, social media content (LinkedIn, Github other portfolio sites) and all additional data you provide us via sending us your curriculum vitae and filling in form for recruitment process,
- name, surname, address, e-mail address, telephone number, bank account details, personal identification numbers when you are current customer, partner or co-worker of the Company.

Users may also visit our Site anonymously. We use cookies to grant positive experience while using our Site, gather general visitor information and track visits to our Site. Please refer to the Cookies section.

### WHY WE COLLECT DATA?

Personal data are processed to:

- answer all your questions and requests sent through the electronic forms and using contact addresses published on the Site, including interactive windows (Article 6 point 1 f) GDPR),
- communicate and provide commercial or marketing information (tutorials, articles, updates) via newsletter on the basis of your voluntary consent (Article 6 point 1 a) GDPR),
- establish cooperation with Company, including verification of your data and preparation of an offer at your request to enter into a cooperation with us (Article 6 point 1 b) GDPR),

- perform the provisions of an already concluded contract if you are an existing Client or another entity cooperating with Company (Article 6 point 1 b) GDPR),
- maintain contact with business partners, including business customers and suppliers e.g. persons responsible on the partner's side for performing the contract with the Company, the Company processes contact details of such persons in order to communicate with business partners on an ongoing basis and to maintain contacts with them. Article 6 point 1 f) GDPR,
- fulfill legal obligations relating in particular, to accounting and taxation and for archival purposes (Article 6 point 1 c) GDPR),
- adapt and develop the functionalities of the Site including its structure and content to your needs and those of other users, produce aggregated statistics and maintain the security and quality of the Site (Article 6 point 1 f) GDPR),
- contact you and carry out the recruitment process in connection with your submission of application documents on recruitment subpage (as far as personal data are required by law, the legal basis for processing is Article 6 point 1 c) GDPR, and for additional data, the provision of which is not required by law, the legal basis for processing is Article 6 point 1 a) GDPR),
- take application documents into account in future recruitment processes (Article 6 point 1 a) GDPR),
- investigate or safeguard against possible claims and defend our rights (Article 6 point 1 f) GDPR),

The Company processes personal data of users who have interacted with our social profiles held on popular social networking sites. The data is processed in order to enable the running and ongoing management of our profiles, including communicating with the community and organising events or competitions, on the principles defined by the functionalities of individual social media and their rules of procedure. Data of community members is also processed for statistical and analytical purposes and may be processed for the purpose of asserting and defending against claims (Article 6 point 1 f) GDPR).

Providing the personal data is voluntary, however, failure to do so may prevent you, depending on the specific case, use of selected functionalities within the Site or contacting us. If personal data are not collected from the data subject, they were obtained e.g. from Company's clients, contractors, partners or co-workers, as well as from publicly accessible registers and Internet platforms.

If at any time you would like to unsubscribe from receiving a newsletter or taking part in future recruitment processes you can simply email [office\\_pl@devtalents.com](mailto:office_pl@devtalents.com) and withdraw your consent, without effect on lawfulness of the processing prior to the withdrawal. You can always withdraw your consent in each case when processing is based on your consent article 6 point 1 a) GDPR.

## **HOW LONG WE PROCESS YOUR DATA?**

The period of personal data processing depends on the purpose and legal basis of the processing.

Personal data obtained through the contact forms or addresses indicated for communication with the Company will be processed for the duration of the communication or until an objection to the processing is raised, but no longer than the claims limitation period under applicable law. Personal data processed for the purposes of newsletters and other subscriptions will be processed until consent is withdrawn. Personal data of contractors, partners or clients will be processed for the

duration of the agreement, and after this period for the time necessary to comply with the law and to establish, investigate or defend against any claims. Personal data collected for the purposes of recruitment will be processed for the whole duration of the recruitment process but no longer than 24 months, and in the event that a given candidate agrees on the processing of data for the purposes of future recruitment, they will be stored until such consent is withdrawn, but no longer than for 4 years. Personal data processed in order to fulfill the legal obligations of the Controller will be processed for the period resulting from the relevant legal provisions. In case of data processing on the basis of a legitimate interest of the Company the data shall be processed for the period enabling its realisation or until an effective objection to the data processing is raised. Each processing period may be extended if the processing is necessary for the establishment, investigation or defence against possible claims, and after this period, only if and to the extent required by law. After the end of the processing period, the data shall be irreversibly deleted or anonymised.

## **RECIPIENTS OF DATA**

The recipients of personal data will be other entities providing appropriate IT services related to the maintenance of the Site, hosting, mailbox administration and management, consulting, accounting, finance, recruitment, legal, newsletter and legal companies, contractors and co-workers of the Company, affiliates of the Company, trusted vendors, marketing agencies, app and social media platform providers, banks, couriers.

The Company reserves the right to disclose selected information concerning the data subject to competent authorities or to third parties who request such information on an appropriate legal basis and in accordance with the provisions of the applicable law.

Personal data may be transferred outside the European Economic Area (EEA) to a third party country, to entities fulfilling a required protection level based on the European Commission requirements. If there is any transfer of data from EEA to other countries, data processors shall comply with the law regulations that ensure an adequate level of security to that of the EU regulations. If personal data is transferred to the third country that does not comply with EC requirements, any processing will be based on up-to-date standard contractual clauses approved by the European Commission. Information and copy of safeguards including such standard contractual clauses may be provided at the Company's registered office or via e-mail.

## **YOUR RIGHTS**

If Company process your data, you have the right to:

- access the data,
- rectify the data,
- restrict the processing of the data,
- erase the data,
- transfer the data,
- object to the processing of data which takes place on the basis of the Company's legitimate interest,
- withdraw your consent (where processing is based on consent) at any time without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.

The users whose data are processed have the right to lodge a complaint with the adequate supervisory body e.g. in Poland to President of the Office for Personal Data Protection (postal address: ul. Stawki 2, 00-193 Warsaw, Poland).

#### **CONTACT INFORMATION**

We welcome your comments or questions about this Privacy policy. You may contact us at our address: [office\\_pl@devtalents.com](mailto:office_pl@devtalents.com).

#### **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change this Privacy policy. If we make any changes, we will change the last updated date below.

This Privacy policy was last updated on 13.05.2022