

Privacy policy



Table of Contents:

<u>1</u>	PRIVACY POLICY REGARDING AMAZON MARKETPLACE WEB SERVICE APIS SERVICES
<u>2</u>	PRIVACY NOTICE - WEBSITE AND COOKIES
<u>3</u>	PRIVACY NOTICE - CONTRACTORS AND THEIR REPRESENTATIVES
<u>4</u>	PRIVACY NOTICE - POTENTIAL CUSTOMERS AND THEIR REPRESENTATIVES
<u>5</u>	PRIVACY NOTICE - EMPLOYEE CANDIDATES



1. PRIVACY POLICY REGARDING AMAZON MARKETPLACE WEB SERVICE APIS SERVICES

This Privacy Policy describes how Nethansa Sp. z o.o. with its registered office in Aleja Grunwaldzka 472 F, 80-309 Gdansk, entered into the Register of Entrepreneurs of the National Court Register under no.: 0000192382 ("we", us", "our" or "Nethansa") process, shares and secures the personal data vended and retrieved through Amazon Marketplace Web Service (Amazon MWS) APIs, including the Marketplace Web Service APIs.

Categories of data

The data vended and retrieved through Amazon MWS APIs can be both public or non-public, including personal data about Amazon Customers.

By a "Customer" we mean any person or entity who has purchased items or services from Amazon's public-facing websites.

The personal data of Customers vended and retrieved through Amazon MWS APIs and processed by us may include the following: name, address, e-mail address, phone number, gift message content, payment status, purchases.

Our role

We are owner of our proprietary Clipperon sales automation system, allowing to automate sales and logistics processes and manage the sale of products on Amazon in a convenient and simple way. Moreover we provide the Sellers with various services related to Amazon marketplaces.

By a "Seller" we mean any person or entity selling on Amazon's public-facing websites.

We use the Marketplace APIs only for the purpose of enhancing and integrating the Sellers' systems with Clipperon system and the features and functionalities permitted by Amazon to be accessed through the Marketplace APIs.

In respect of personal data vended and retrieved through Amazon MWS APIs and processed by us in connection with Clipperon system and other services provided to the Sellers, the data controller shall be the Seller. The role of Nethansa in relation to the processing of such personal data shall be exclusively that of data processor on behalf of the Seller. Thus we enter into data processing agreement with the Seller.

Purpose of data processing

The personal data vended and retrieved through Amazon MWS APIs will be processed by us, as the developer and data processor, in accordance with applicable privacy laws, including the General Data Protection Regulation (GDPR) and documented instructions of the Seller, solely for the purpose to fulfill orders placed by the Customers at Amazon marketplace with the Seller.

We do not process personal data vended and retrieved through Amazon MWS APIs for our own purposes.

Data retention period

We may retain and process the personal data vended and retrieved through Amazon MWS APIs as long as is necessary to fulfill orders, however in each case no longer than 30 days after order shipment.

Nethansa sp. z o.o.

Budynek Olivia Prime B, Aleja Grunwaldzka 472 F, 80-309 Gdansk



After the expiry of that period the personal data are permanently and securely deleted (in accordance with industry-standards).

We may also delete and/or return such any Amazon data sooner, promptly after we receive Amazon's request in that respect.

Data sharing

We do not disclose data, individually labeled or aggregated, vended and retrieved through Amazon MWS APIs on behalf of a Seller to any third party, unless required by law.

Data security

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk related to processing of the personal data vended and retrieved through Amazon MWS APIs, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing, in order to:

- (a) maintain the security and confidentiality of such data accessed, collected, used, stored, or transmitted by us;
- (b) protect such data from known or reasonably anticipated threats or hazards to its security and integrity, accidental loss, alteration, disclosure, and all other unlawful forms of processing.

These include, but are not limited to, the following:

- (a) ensuring proper data governance through the implementation of the personal data protection policy and registers of processing activities and categories of processing activities;
- (b) implementation of the role-based-access-control, based on a "need-to-know" basis and raising awareness of our employees;
- (c) implementation of the procedures aimed at handling security incidents, including logging and monitoring of our systems;
- (d) implementation of the technical measures such as network protection controls, data backups at regular intervals as well as encryption of data in transit and data at rest, including backups.

We monitor, review and update implemented technical and organizational measures on a regular basis.

Your rights

In relation to the processing of personal data covered by this Privacy Policy a data subject is entitled to specific rights in accordance with applicable privacy laws, including the General Data Protection Regulation (GDPR).

For further information in this regard, please contact the given Seller who is the data controller.

Contact us

If you have any questions or requests regarding the data vended and retrieved through Amazon MWS APIs in connection with the services we provide, please contact us:

- (a) electronically to the e-mail address: <u>office@nethansa.com</u>;or
- (b) in writing to the following address: Nethansa sp. z o.o. Budynek Olivia Prime B, Aleja Grunwaldzka 472 F, 80-309 Gdansk, Poland.



Changes

We may update this Privacy Policy from time to time without prior notice.

Any changes to our Privacy Policy will become effective upon posting of the updated Privacy Policy on our website. If we change this Privacy Policy, we will revise the effective date at bottom thereof. We recommend that you periodically review this Privacy Policy for any changes.

Effective date: 12/08/2019



2. **PRIVACY NOTICE** - WEBSITE AND COOKIES

We hereby inform you about how we process personal data collected through the website https://www.nethansa.com/ ("Website") and cookies and how we use cookies.

The Website provides links to other websites. Nethansa is not responsible for the privacy policy applicable to such websites.

Personal data controller

The owner of the Website and the controller of the user's personal data is Nethansa sp. z o.o. Budynek Olivia Prime B, Aleja Grunwaldzka 472 F, 80-309 Gdansk, Poland, NIP: 0000192382 ("Nethansa").

Categories of personal data

While using the Website, a user may be asked to provide some of their personal data, in particular by filling the contact form.

Personal data collected through the contact form shall include: name and surname (business name or company name), e-mail address and telephone number. Providing the above data is voluntary, however, providing your name and surname (business name or company name) and e-mail address is necessary in order to properly handle your enquiry or complaint.

We may also collect other personal data voluntarily provided by you when you contact us directly via e-mail or contact form.

The Website also uses cookies in order to collect other non-personal data. To learn more about this subject, please read the next provisions of this document regarding cookies policy.

Purpose and basis of processing of personal data

Nethansa processes personal data of the user in order to handle enquiries and complaints regarding products or services of Nethansa, direct marketing regarding products and services of Nethansa in connection with the submitted enquiries, establishment, exercise or defence of legal claims (the basis for processing of personal data in the cases described above shall constitute legitimate interests of Nethansa).

Period of personal data storage

The time of processing and storing your personal data depends on the legal basis on which the processing is performed. In all cases, the personal data will be stored by Nethansa for the period necessary to achieve the purposes of the processing.

Personal data processed for the purpose of handling your enquiry or complaint will be stored for the period necessary for its handling and communication with you in this regard.

The storage period can be extended by a limitation period in each case if processing of personal data is necessary to establish or determine possible claims or to defend claims by Nethansa.

Recipients of personal data

Depending on a given case, your personal data may be transferred to entities providing services to Nethansa, in particular accounting and tax services providers, legal and tax advisory services, technical services (e-mail, hosting).



Transferring personal data takes place in accordance with legal requirements, in particular Nethansa entrust processing of the personal data on its behalf on the basis of the relevant agreements.

We process your personal data within the European Economic Area.

Your personal data may be transferred to a third country (e.g. within the IT services provided to Nethansa), if the conditions set out in the provisions of law are fulfilled, including:

- the country to which we transfer personal data ensures an adequate level of security in accordance with the decision of the European Commission;
- the personal data shall be transferred to a recipient in the USA who is registered in the Privacy Shield;
- personal data shall be transferred on the basis of standard contractual clauses adopted by the European Commission;
- the transfer is necessary for the performance of an agreement between you and Nethansa or for the implementation of pre-contractual measures taken at your request;
- the transfer is necessary for the establishment, exercise or defense of legal claims;
- you have given a clear consent to the transfer of your personal data.

For more information on transferring data to third countries, including relevant safeguards, please contact Nethansa.

Profiling. Automated decision making

Nethansa does not profile or automatically make decisions.

Your rights

You have the right to access and rectify data, the right to request erasure or restriction the processing – in the cases and to the extent specified in the provisions of the GDPR.

Right to object

You have the right to object to the processing of your personal data - for reasons related to your specific situation - when the processing is carried out within the scope of the objectives arising from legitimate interests pursued by Nethansa. In such a case, Nethansa shall discontinue the processing of your data for such purposes, unless Nethansa proves that there are legitimate grounds for Nethansa in relation to such data which are superior to your interests, rights and freedoms or that the data are necessary for Nethansa to determine, assert or defend any claims.

In addition, you have the right to object to the processing of your personal data for the purposes of direct marketing of Nethansa's products and services to the extent that the processing is related to such direct marketing.

In this case, Nethansa will stop processing your data for these purposes.

Right to lodge a complaint with the supervisory authority

If you believe that your personal data are being processed by Nethansa in an unlawful manner, you have the right to file a complaint with a supervisory authority (that is: President of the Personal Data Protection Office (Personal Data Protection Office - ul. Stawki 2, 00-193 Warsaw).

Cookies

Cookies is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. Then, during each subsequent visit, they are sent back to the Website from which they were downloaded or to another that recognizes the cookie. Identification



takes place impersonally, anonymously and these are only data concerning the manner and form of using the Website.

More information about cookies can be found in the "Help" section of your browser.

Within the Website, cookies are used for the following purposes:

- a) to provide services through the Website;
- b) to present multimedia content on the Website;
- to adjust the content of the Website to your preferences and optimize the use of websites; in particular, these files allow you to recognize your device and appropriately display the Website, adapted to your individual needs;
- d) to use interactive functions in order to popularize the Website by means of social media sites;
- e) to make anonymous statistics using analytical tools which help us understand how you use the Website in order to improve its structure and content;
- f) to publish commercials that are tailored to your needs, interests and place of residence;
- g) to ensure the security and reliability of the Website.

There are two basic types of cookies used on the Website:

- a) session files these are temporary files that are stored in your device until you close the Website or turn off the software (web browser); and
- b) permanent files these are files stored in your device for a period of time specified in the parameters of these cookies or until they are deleted by you.

Please be informed that in addition to our own cookies, we also use third party cookies uploaded by our partners through the Website, in particular for:

- statistical needs (Google Analytics [cookie controller: Google Inc. with its registered office in the USA, Facebook Pixel [cookie controller: Facebook Inc. with its registered office in the USA or Facebook Ireland with its registered office in Ireland]); and
- b) location recognition (google.com (google.maps) [cookie controller: Google Inc. based in the USA]; and
- c) use of interactive functions in order to popularize the site using social media sites Facebook.com [cookie controller: Facebook Inc. with its registered office in the USA or Facebook Ireland with its registered office in Ireland], LinkedIn.com [cookie controller: LinkedIn Ireland Unlimited Company with its registered office in Ireland or LinkedIn Corporation with its registered office in the USA]

You can independently and at any time change the settings for cookies by setting the conditions for their storage and access by cookies to your device. You can make changes by using browser settings. Details about the possibilities and methods of using cookies are available in the software settings (web browser).

You can also delete cookies at any time by using the available functions in your web browser. Restricting the use of cookies may affect some of the functions available on the Website.

Changes in the Privacy Notice

The Website's offer may be extended over time. Technologies, standards and legal requirements will also be changed. This means that in the future we may introduce modifications to this Privacy Notice. Using the Website after such changes come into force means their acceptance.

Contact



All enquiries and decisions within the abovementioned scope can be addressed to WorkITNow in the following way:

- (a) electronically to the e-mail address: office@nethansa.com
- (b) in writing to the following address: Nethansa sp. z o.o. Budynek Olivia Prime B, Aleja Grunwaldzka 472 F, 80-309 Gdansk



3. **PRIVACY NOTICE** - CONTRACTORS AND THEIR REPRESENTATIVES

We hereby inform you how we process personal data of natural persons who are our contractors (receivers of our products and services or suppliers of our products and services) and their representatives (e.g. members of the management board, proxies, shareholders, attorneys-in-fact, employees or associates of the potential customer who are contact persons).

If you are a natural person and also our contractor or a representative of our contractor, these provisions shall apply to you.

Please read them carefully.

Personal data controller

The personal data controller is Nethansa Sp. z o.o. with its registered office in Aleja Grunwaldzka 472 F, 80-309 Gdansk Poland, entered into the register of entrepreneurs of the National Court Register under KRS number 0000192382 ("Nethansa").

Categories of personal data

In connection with cooperation between Nethansa and its contractors, depending on the specific case, we may collect personal information such as:

- (a) identification data (in particular, name and surname business name or company name, identification numbers such as tax identification number (NIP) or statistical identification number (REGON));
- (b) contact details (in particular e-mail address, telephone or fax number, business address, correspondence address);
- (c) bank account number;
- (d) job position and workplace.

Sources of personal data

We may collect personal information from the following sources:

- (a) directly from you (if you are a party of an agreement with Nethansa as a natural person or if you contact Nethansa on behalf of our contractor);
- (b) from a contractor of Nethansa you represent;
- (c) from other publicly available sources, such as databases like Bisnode, Info Veriti, CEIDG's business registers or the National Court Register in order to verify the information we have.

Upon your request, we will inform you every time of the exact source from which we collected your personal data.

In the event of concluding an agreement with Nethansa, providing personal data is voluntary, however, necessary to conclude an agreement and to cooperate with Nethansa.

If you do not conclude an agreement with Nethansa, providing personal data may be your professional duty and necessary for the proper performance of the agreement concluded between Nethansa and the contractor you represent. In this case, Nethansa's legitimate interest is to contact you as a person



appointed to perform the contract concluded with Nethansa. In case of any doubts regarding the necessity of processing your personal data, contact your employer or other entity you cooperate with.

Purpose and basis of processing of personal data

In the event that you are <u>a contractor of Nethansa</u>, your personal data will be processed by Nethansa for the following purposes:

- (a) taking steps to conclude an agreement and perform the agreement of which you are a party (the basis for the processing of personal data in the cases described above is necessary for processing of personal data in order to achieve these purposes);
- (b) fulfilling legal obligations Nethansa is subject to, in particular those arising from tax and accounting regulations (the basis for processing personal data in the cases described above is the necessity of data processing for compliance with a legal obligation Nethansa is subject to);
- (c) achieving the objectives arising from legitimate interests pursued by Nethansa (the basis for the processing of personal data in the cases described above are the legitimate interests pursued by Nethansa), i.e.
- a. maintaining relationships with you as a contractor;
- b. direct marketing regarding products and services of Nethansa;
- c. preventing fraud, including verification of contractors in public registers;
- d. establishing, exercising or defending of legal claims.

If you are a <u>representative of a contractor of Nethansa</u>, your personal data will be processed by Nethansa for the purposes arising from legitimate interests pursued by Nethansa (the basis for processing personal data in the cases described above are the legitimate interests pursued by Nethansa), i.e.

- a. enabling the conclusion and performance of an agreement concluded with the contractor, including contacting the contractor in relation to the cooperation of the parties;
- b. maintaining relationships with the contractor;
- c. direct marketing regarding products and services provided by Nethansa in relation to the contactor;
- d. preventing fraud, including verification of contractors in public registers;
- e. establishing, exercising or defending of legal claims.

Period of personal data storage

The time during which your personal data are processed and stored depends on the legal basis on which the processing is based. In any case, the personal data will be stored by Nethansa for the period necessary to achieve the purposes of the processing.

Your personal data will be processed for the entire term of the contract and for a period not shorter than the expiration period of potential claims.

To the extent your personal data are processed for the purposes of direct marketing of products and services of Nethansa, they will be stored by Nethansa until you object to the processing of your personal data.

Within the scope specified in separate regulations, your personal data will be processed for the period indicated therein.

Recipients of personal data



Depending on a given case, your personal data may be transferred to other contractors of Nethansa, including subcontractors of Nethansa, entities providing services to Nethansa, in particular to entities providing accounting, legal and tax services as well as technical services providers (e-mail, hosting). Transferring personal data is carried out in accordance with legal requirements, in particular Nethansa entrusts the processing of personal data on its behalf on the basis of relevant contracts.

We shall process your data within the European Economic Area.

Your personal data may only be transferred to a third country (e.g. within the scope of IT services provided to Nethansa), if the conditions stipulated by the applicable provisions of law are met, including:

- the country to which we shall transfer your personal data ensure an adequate level of protection in accordance with decision of the European Commission;
- personal data shall be transferred to a recipient in the USA that is registered in the Privacy Shield;
- personal data shall be transferred on the basis of the standard contractual clauses adopted by the European Commission;
- you have given your explicit consent to the transferring.

For more information on transferring personal data to third countries, including appropriate security measures, please contact Nethansa.

Your rights

You have the right to access and rectify data, the right to request erasure or restriction the processing as well as the right to data portability – in the cases and to the extent specified in the provisions of the GDPR.

Right to object

You have the right to object to the processing of your personal data - for reasons related to your specific situation - when the processing is carried out within the scope of the objectives arising from legitimate interests pursued by Nethansa. In such a case, Nethansa shall discontinue the processing of your data for such purposes, unless Nethansa proves that there are legitimate grounds for Nethansa in relation to such data which are superior to your interests, rights and freedoms or that the data are necessary for Nethansa to determine, assert or defend any claims.

In addition, you have the right to object to the processing of your personal data for the purposes of direct marketing of Nethansa's products and services to the extent that the processing is related to such direct marketing. In this case, Nethansa will stop processing your data for these purposes.

Right to lodge a complaint with the supervisory authority

If you believe that your personal data are processed by Nethansa in an unlawful manner, you have the right to lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office (Personal Data Protection Office - ul. Stawki 2, 00-193 Warsaw, Poland).

Profiling. Automated decision making

Nethansa does not use profiling or automated decision-making.

Contact



All enquiries and decisions within the above mentioned scope can be addressed to Nethansa in the following way:

- (a) electronically to the e-mail address: office@nethansa.com; or
- (b) in writing to the following address: Nethansa sp. z o.o. Budynek Olivia Prime B, Aleja Grunwaldzka 472 F, 80-309 Gdansk, Poland.



4. **PRIVACY NOTICE** POTENTIAL CUSTOMERS AND THEIR REPRESENTATIVES

We hereby inform you how we process personal data of natural persons who are our potential customers and their representatives (e.g. members of the board, proxies, shareholders, attorneys-infact, employees or associates of the potential customer who are contact persons).

If you are a natural person and also our potential customer or representative of our potential customer, these provisions shall apply to you.

Please read them carefully.

Personal data controller

The personal data controller is Nethansa Sp. z o.o. with its registered office in Aleja Grunwaldzka 472 F, 80-309 Gdansk, Poland, entered into the register of entrepreneurs of the National Court Register under KRS number 0000192382 ("Nethansa").

Categories of personal data

In connection with Nethansa's potential cooperation with its customers, depending on the specific case, we may collect personal information such as:

- (a) identification data (in particular, name and surname business name or company name, identification numbers such as tax identification number - NIP - or statistical identification number - REGON);
- (b) contact details (in particular e-mail address, telephone or fax number, business address, correspondence address);
- (c) position and workplace.

Sources of personal data

We may collect personal information from the following sources:

- (a) directly from you (if you are self-employed or if you contact us on behalf of a potential customer);
- (b) from a potential customer of Nethansa you represent;
- (c) from a third party who has provided us with your contact details as a person interested in Nethansa's products or services;
- (d) from other publicly available sources, such as such as databases like Bisnode, Info Veriti, CEIDG's business registers or the National Court Register.

Upon your request, we will inform you every time of the exact source from which we collected your data

In the event that we collect data directly from you, providing such data is voluntary.

Purpose and basis of processing of personal data

Your personal data will be processed by Nethansa for the purposes of direct marketing of Nethansa's products and services (purposes arising from legitimate interests pursued by Nethansa – letter f) of Article 6 (1) of the GDPR), including contacting you for the purpose of concluding a contract regarding Nethansa's products and services.



Period of personal data storage

Your data will be stored by Nethansa until you raise an objection to the processing of your personal data.

Recipients of personal data

Your personal data may be transferred to entities providing services to Nethansa, in particular to Nethansa's representatives and partners acquiring customers for Nethansa's products and services in the name and on behalf of Nethansa, legal advisors, technical service providers (e-mail, hosting).

Transferring personal data is carried out in accordance with legal requirements, in particular Nethansa entrusts the processing of personal data on its behalf on the basis of relevant contracts.

We shall process your data within the European Economic Area.

Your personal data may only be transferred to a third country (e.g. within the scope of IT services provided to Nethansa), if the conditions stipulated by the applicable provisions of law are met, including:

- the country to which we shall transfer your personal data ensure an adequate level of protection in accordance with decision of the European Commission;
- personal data shall be transferred to a recipient in the USA that is registered in the Privacy Shield;
- personal data shall be transferred on the basis of the standard contractual clauses adopted by the European Commission;
- you have given your explicit consent to the transferring.

For more information on transferring personal data to third countries, including appropriate security measures, please contact Nethansa.

Your rights

You have the right to access and rectify data, the right to erase data, the right to restrict the processing as well as the right to object to the processing of your data – in the cases and to the extent specified in the provisions of the GDPR.

Right to object

You also have the right to object to the processing of your personal data for the purposes of direct marketing of Nethansa's products and services to the extent that the processing is related to such direct marketing.

In this case, Nethansa will stop processing your data for these purposes.

Right to lodge a complaint with the supervisory authority

If you believe that your personal data are processed by Nethansa in an unlawful manner, you have the right to lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office (Personal Data Protection Office - ul. Stawki 2, 00-193 Warsaw, Poland).

Profiling. Automated decision making

Nethansa does not use profiling or automated decision-making.



Contact

All enquiries and decisions within the above mentioned scope can be addressed to Nethansa in the following way:

- (a) electronically to the e-mail address: office@nethansa.com;or
- (b) in writing to the following address: Nethansa sp. z o.o. Budynek Olivia Prime B, Aleja Grunwaldzka 472 F, 80-309 Gdansk, Poland.



5. **PRIVACY NOTICE** - EMPLOYEE CANDIDATES

We hereby inform you about how we process personal data of natural persons who would like to apply for a job position in Nethansa.

If you are a natural person and a candidate for a job, these provisions shall apply to you. Please read them carefully.

Personal data controller

Personal data controller is Nethansa sp. z o.o. with its registered office at Aleja Grunwaldzka 472 F, 80-309 Gdansk, Poland, entered into the register of entrepreneurs kept by the National Court Register under the KRS number: 0000192382 ("Nethansa").

Categories of personal data

For the recruitment process, we may collect the following personal data:

(a) name(s) and surname, date of birth, contact details, education, professional qualifications and data regarding the course of employment (Article 22 (1) § 1 of the Polish Labour Code);

and

(b) other personal data (e.g. image recorded on a photograph, information about disability), if provided by you. You are not obliged to do so, but sending us such data means that you have consented to the processing thereof for the purpose of recruitment.

The consent you have given by submitting the abovementioned (other) personal data may be withdrawn by you at any time. However, until your consent is withdrawn, the processing of such data is in compliance with applicable provisions of law.

Providing personal data in order to take part in the recruitment process is voluntary. If you do not provide your personal data (referred to in Article 22 (1) § 1 of the Polish Labour Code), you will not be able to take part in the recruitment process.

Sources of personal data

We may collect personal data from the following sources:

- (a) directly from you;
- (b) from other controllers (for instance from the website pracuj.pl, if you have set there an account with option to share your profile with employers);

Upon your request, we will inform you every time of the exact source from which we collected your personal data.

Purpose and basis of processing of personal data

Purpose	Legal basis for processing	Storage period
We process your personal	The legal basis shall be Article	Personal data of persons
data (referred to in Article 22	6(1)(b) of the GDPR to the extent	who have not been
(1) § 1 of the Polish Labour	that it forms the grounds for the	selected are not stored



Purpose

Code) in order to assess your qualifications for a specific job position and to make decisions about your application and possible employment.

We also process your personal data, which you have no obligation to provide, in order to evaluate your qualifications for a specific job position and to make decisions regarding your application and possible employment.

We also process your personal data in order to evaluate your qualifications for a specific job position in the future (future recruitment or when the recruitment was not published, but you sent us your CV).

Legal basis for processing

processing of your personal data upon your request, before concluding an agreement.

The legal basis shall be your consent (Article 6(1)(a) and Article 9(2)(a) of the GDPR), which may be expressed by providing us with such personal data.

You have every right to withdraw your consent at any time by any means, also by sending a message to the addresses indicated below. The processing of personal data until the withdrawal of your consent is in compliance with the applicable provisions of law.

The legal basis shall be your consent (Article 6(1)(a) and Article 9(2)(a) of the GDPR) expressed by including a clause proposed by us (declaration of consent) in your CV or by clicking the check box (if there is any under the job advertisement).

You have every right to withdraw your consent at any time by any means, also by sending a message to the addresses indicated below. The processing of personal data until the withdrawal of consent is in compliance with the applicable provisions of law.

If you want Nethansa to keep your application for the future recruitment, please include the

Storage period

but erased immediately after completing the recruitment process.

Until you withdraw your consent to the processing of such personal data before or after the recruitment process is completed, once you have not been selected for the job position you applied for.

Until you withdraw your consent to the processing of personal data, but no longer than 12 months.



Purpose Legal basis for processing Storage period

following clause in your CV: "I hereby agree to the processing of my personal data also in connection with future recruitment processes conducted by Nethansa Sp. z o.o.".

Recipients of personal data

Depending on a given case, your personal data may be transferred to other contractors of Nethansa, including subcontractors of Nethansa, entities providing services to Nethansa, in particular to entities providing accounting, legal and tax services as well as technical services providers (e-mail, hosting). Transferring personal data is carried out in accordance with legal requirements, in particular Nethansa entrusts the processing of personal data on its behalf on the basis of relevant contracts.

We shall process your data within the European Economic Area.

Your personal data may only be transferred to a third country (e.g. within the scope of IT services provided to Nethansa), if the conditions stipulated by the applicable provisions of law are met, including:

- the country to which we shall transfer your personal data ensure an adequate level of protection in accordance with decision of the European Commission;
- personal data shall be transferred to a recipient in the USA that is registered in the Privacy Shield;
- personal data shall be transferred on the basis of the standard contractual clauses adopted by the European Commission;
- the transfer is necessary in order to perform the agreement between Nethansa and you or to implement the pre-contractual measures taken at your request;

the transfer is necessary in order to establish, enforce or protect claims;

you have given your explicit consent to the transferring.

For more information on transferring personal data to third countries, including appropriate security measures, please contact Nethansa.

Your rights

You have the right to access and rectify data as well as the right to request erasure or restriction the processing – in the cases and to the extent specified in the provisions of the GDPR.

Right to lodge a complaint with the supervisory authority

If you believe that your personal data are processed by Nethansa in an unlawful manner, you have the right to lodge a complaint with the supervisory authority, i.e. the President of the Personal Data Protection Office (Personal Data Protection Office - ul. Stawki 2, 00-193 Warsaw, Poland).

Profiling. Automated decision making

Nethansa does not use profiling or automated decision-making.



Contact

All enquiries and decisions within the above mentioned scope can be addressed to Nethansa in the following way:

- (a) electronically to the e-mail address: office@nethansa.com; or
- (b) in writing to the following address: Nethansa sp. z o.o. Budynek Olivia Prime B, Aleja Grunwaldzka 472 F, 80-309 Gdansk, Poland.