



**Acting on the basis of Articles 13 and 14 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, the so-called GDPR, we inform you that:**

**1. Data controller:**

The controller of your personal data is, as the case may be:

- **BCUBE Sp. z o.o. with its** registered office in Bieruń (43 - 150) at Turyńska 135 ;
- **BCUBE Poland Logistics Sp. z o.o. with its** registered office in Tychy (43 - 100) at Turyńska 100;
- **BCUBE Poland Services Sp. z o.o. with its** registered office in Tychy (43 - 100) at Turyńska 100.

**2. Categories of personal data processed:**

- **JOB CANDIDATES:**

Personal data is processed:

- for the purpose of entering into an employment contract or at the request of the data subject prior to entering into an employment contract on the basis of Article 6(1)(b) of the GDPR;
- on the basis of the job applicant's consent pursuant to Article 6(1)(a) of the GDPR and Article 9(2)(a) of the GDPR, which may also include the processing of personal data for subsequent recruitment processes.

The scope of the processed data is limited to information required to be provided by labour law, necessary for the conclusion of the contract (first name(s) and surname, date of birth, contact details indicated by such person, education, professional qualifications, previous employment history), as well as information provided voluntarily by the job applicant (e.g. image - photo), other contact details, personality and/or psychological tests and fluid intelligence tests, video recording of the interview).

The processing of personal data is necessary in order to participate in the recruitment for a job with the Administrator.

To the extent that personal data processing is based on consent, the provision of personal data is entirely voluntary.

Personal data will be processed during the recruitment process and afterwards as long as consent to process personal data is not withdrawn, but for a maximum of one year.

Every job applicant is entitled to:

- Based on Article 15 of the DPA, the right of access to personal data;
- Pursuant to Article 16 GDPR, the right to rectification of personal data;
- Based on Article 17 GDPR, the right to request the erasure of personal data;
- pursuant to Article 18 GDPR, the right to request the restriction of the processing of personal data, subject to the cases referred to in Article 18(2) GDPR;
- on the basis of Article 20 GDPR, the right to data portability only to the extent that personal data are processed by automated means;
- The right to lodge a complaint with the President of the Office for the Protection of Personal Data, ul. Stawki 2, 00 - 193 Warsaw, in the event that the processing of personal data is considered to infringe the provisions of the GDPR.

In the case of the processing of personal data on the basis of consent, the job applicant has the right to withdraw the consent, which, however, does not affect the validity of the acts carried out on the basis of consent during the period between the granting of the consent and the withdrawal.

Due to the nature of the processing of personal data during the online recruitment interview, you do not have the right of access, the right to obtain a copy of your data, the right to erasure, the right to restrict the processing of your data, the right to data portability and the right not to be subject to automated decision-making.

The job candidate does not have the right to object to the processing of personal data on the basis of Article 21 of the GDPR, as the legal basis for the processing of personal data is not Article 6(1)(e) or (f) of the GDPR.

- **GUESTS:**

The scope of personal data includes data necessary for identification, data recorded by monitoring and vehicle data.

Personal data is processed on the basis of Article 6(1)(f) of the GDPR solely for the purpose of ensuring the safety of persons and the protection of property, controlling production and ensuring the confidentiality of information, which is a legitimate interest of the Administrator.

Provision of the data is necessary - failure to do so will result in non-identification and therefore inability to access the Company's premises.

Therefore, it is necessary to present an ID card in order to issue a pass - however, the ID card will not be photocopied, scanned or photographed.

Personal data are processed for as long as required by law for ensuring the safety of persons and the protection of property for the establishment, investigation or defence of claims.

Data recorded by video surveillance shall be stored for a period not exceeding 30 days.

Each person is entitled to:

- Based on Article 15 of the DPA, the right of access to personal data;
- Pursuant to Article 16 GDPR, the right to rectification;
- pursuant to Article 18 GDPR, the right to request the controller to restrict the processing of personal data, subject to the cases referred to in Article 18(2) GDPR;
- The right to lodge a complaint with the President of the Data Protection Authority if it is considered that the processing of personal data violates the provisions of the GDPR.

Where the legal basis for processing is Article 6(1)(f) of the GDPR, you have the right under Article 21 of the GDPR to object to the processing of your personal data.

You are not entitled to:

- The right to request the erasure of personal data in relation to Article 17(3)(b), (d) or (e) of the GDPR;
- The right to data portability as referred to in Article 20 of the GDPR.

Video surveillance recordings cannot be corrected for technical reasons and are not subject to the right to obtain a copy where this could infringe the rights and freedoms of others who may be on the recording.

- **CUSTOMERS and CONTRACTORS:**

The scope of personal data includes identification data, contact data and data contained in publicly available records and sources or provided by the Customer/Contractor, including data of persons entitled to representation and data of proxies and data of contact persons.

Personal data are processed, depending on the legal basis linking the Parties, for:

- the conclusion of a contract or the performance of its provisions on the basis of Article 6(1)(b) of the DPA;
- to take pre-contractual action at the request of the data subject, in particular to prepare an offer on the basis of Article 6(1)(b) of the GDPR;
- fulfilment of a legal obligation in terms of tax, accounting obligations on the basis of Article 6(1)(c) of the DPA;
- the fulfilment of the Administrator's legitimate interest in marketing its own goods, in carrying out correspondence or responding to enquiries made using the Administrator's contact details, and in carrying out debt collection activities and handling complaints where necessary on the basis of Article 6(1)(f) of the GDPR;
- in respect of data processed when using the ZOOM platform to hold remote meetings, which constitutes the legitimate interest of the Administrator on the basis of Article 6(1)(f) GDPR.

In the case of concluding a contract with a commercial law company or institution, the Administrator will process the personal data of the persons authorised to represent them and of the persons indicated for contact exclusively for the purposes related to the conclusion and performance of contracts and the conduct of possible complaint and recovery actions, which constitutes the Administrator's legitimate interest pursuant to Article 6(1)(f) of the GDPR. In this case, personal data includes identification data, contact data, position held and other data available in publicly available registers (e.g. KRS, CEIDG) or provided by the company or institution for the purpose of concluding and performing a contract.

The provision of personal data is necessary for the conclusion and performance of the contract.

Your personal data will be processed for the time necessary for the performance of the contract or the limitation of claims, as well as for the fulfilment of a legal obligation incumbent on the Administrator, in particular with regard to tax and accounting obligations.

Each person is entitled to:

- Based on Article 15 of the DPA, the right of access to personal data;
- Pursuant to Article 16 GDPR, the right to rectification of personal data;
- Based on Article 17 GDPR, the right to request the erasure of personal data;
- pursuant to Article 18 GDPR, the right to request the restriction of the processing of personal data, subject to the cases referred to in Article 18(2) GDPR;
- pursuant to Article 20 GDPR, the right to data portability only to the extent that the personal data are processed by automated means and on the basis of a contract ;
- The right to lodge a complaint with the President of the Office for the Protection of Personal Data, ul. Stawki 2, 00 - 193 Warsaw, in the event that the processing of personal data is considered to infringe the provisions of the GDPR.

In the case of processing on the basis of Article 6(1)(f) GDPR, i.e. for the purpose of pursuing legitimate interests, the customer/contractor has the right to object to the processing.

Due to the nature of the processing of personal data during online interviews, you do not have the right of access to the data, the right to obtain a copy of the data, the right to erasure, the right to restrict processing, the right to data portability and the right not to be subject to automated decision-making.

- **CONTACT/CORRESPONDENCE**

The personal data is processed for the purpose of responding to an enquiry made using the contact form or by post, which is a legitimate interest of the Administrator on the basis of Article 6(1)(f) of the DPA.

The provision of data is necessary in order to respond to an enquiry made using the contact form or by post.

Your personal data shall be processed for the time necessary for the limitation of claims.

Each person is entitled to:

- Based on Article 15 of the DPA, the right of access to personal data;
- Pursuant to Article 16 GDPR, the right to rectification of personal data;
- Based on Article 17 GDPR, the right to request the erasure of personal data;
- pursuant to Article 18 GDPR, the right to request the restriction of the processing of personal data, subject to the cases referred to in Article 18(2) GDPR;
- on the basis of Article 20 GDPR, the right to data portability only to the extent that the personal data are processed by automated means and on the basis of a contract;
- The right to lodge a complaint with the President of the Office for the Protection of Personal Data, ul. Stawki 2, 00 - 193 Warsaw, in the event that the processing of personal data is considered to infringe the provisions of the GDPR.

Where data is processed on the basis of Article 6(1)(f) of the GDPR, i.e. for the purposes of the legitimate interests of the sender or addressee of the correspondence, you have the right to object to the processing.

### **3. Transfer of personal data outside the European Economic Area:**

The employee's personal data may be transferred outside the European Economic Area only in the case of business trips. In this case, the Administrator will ensure that the personal data is duly secured, in particular by signing appropriate agreements, and that the right to obtain a copy of the data can be exercised or information on where the data can be accessed.

In cases not mentioned above, personal data is not transferred outside the European Economic Area or to international organisations.

**4. Profiling:**

Personal data are not used in automated decision-making processes, in particular profiling.

**5. Recipients of personal data:**

Personal data may be made available to state authorities in connection with their investigations under applicable law.

Otherwise, access to personal data is also available to trained and authorised employees or associates of the Controller, including providers of security services for persons and property, legal, consultancy, IT, accounting, courier or postal services, auditing, programming, insurance.

**6. Contact details of the Data Protection Officer:**

If you have any questions or comments regarding the processing of your personal data, in particular to exercise your rights, please contact the Data Protection Officer Mr. Tomasz Cygan, e-mail: [iod@bcube.com.pl](mailto:iod@bcube.com.pl) or by letter to the administrator.

We ensure that the Data Controller makes every effort to provide physical, technical and organisational measures to protect personal data against accidental or intentional destruction, loss, alteration, unauthorised disclosure, use or access in accordance with applicable legislation.

